

GRIEVANCE MECHANISM

P MGMT-15 / 09.12.2025

1. PURPOSE

Thuka Nordwood AS provides an accessible, trusted, and effective grievance mechanism for workers, suppliers, community members, and all stakeholders who may be affected by our operations or business relationships, in line with the UN Guiding Principles on Business and Human Rights.

Use of this mechanism does not limit or restrict any individual's right to seek remedy through state-based, judicial, or other external processes.

2. SCOPE & ELIGIBILITY

Any individual or group affected by our operations or supply chain may submit a grievance, including employees, contractors, agency workers, suppliers, subcontractor workers, community members, service providers, and customers.

3. DEFINITION OF A GRIEVANCE

A grievance is any concern, complaint, or report that an individual believes reflects a breach of rights, unsafe conditions, unethical conduct, unfair treatment, or any adverse impact connected to our operations or business partners.

3.1 Examples of issues that may be reported:

- Health and safety concerns,
- Harassment, discrimination, or bullying,
- Wage, working hours, or labour-standard violations,
- Freedom of association concerns,
- Environmental or community impacts,
- Human rights impacts including forced labour or child labour,
- Ethical or integrity concerns such as fraud or misconduct,
- Any behaviour inconsistent with company policies or international standards.

Assistance in Submitting a Grievance:

- Employees have the right to seek support from a trade union or worker representative if they require assistance in submitting or pursuing a grievance.

4. PRINCIPLES

- **Legitimacy** – governed by an independent, accountable process.
- **Accessibility** – available in multiple languages, free of charge, and open to all stakeholders.
- **Predictability** – clear procedure, timeframes, and communication points.
- **Equitability** – fair treatment and the ability for complainants to present information.
- **Transparency** – clear communication of the process, progress, and outcomes.
- **Rights-compatibility** – outcomes respect international human rights and labour standards.
- **Confidentiality** – personal data and identities are protected.
- **Non-retaliation** – no retaliation is tolerated; protection is provided to all complainants. Protection against retaliation applies equally to complainants, witnesses, representatives, translators, and anyone assisting in the grievance process.
- **Continuous improvement** – learning from cases to strengthen policies and practices.
- Where appropriate, investigations may be handled by a neutral internal specialist or an external independent expert to ensure impartiality.

5. REPORTING CHANNELS

Stakeholders may choose any of the following channels to submit a grievance:

- **Online QR code:**



- **Email:** vihje@thuka.ee
- **Phone number:** +372 5336 3365 (HR Manager)
- **In-person:** HR Manager, supervisor
- **Anonymous submission** is available through all channels

6. INFORMATION TO INCLUDE WHEN SUBMITTING A GRIEVANCE

To help us respond effectively, please provide as much detail as you feel comfortable sharing, such as:

- Description of the concern or incident

Written by: Helen Rästa/ Maris Siim

Approved by: Member of Management Board

Responsible: HR Manager

- Date(s), time, and location (if known)
- People involved or affected
- Any evidence available (optional)
- Whether the issue is ongoing or urgent
- Your preferred contact method (unless anonymous)

No evidence is required to report a grievance. Reports made in good faith will never result in disciplinary action, even if unconfirmed.

7. HANDLING OF ANONYMOUS GRIEVANCES

Anonymous grievances are accepted. While limited information may affect the depth of the investigation, all cases will be reviewed, assessed, and addressed to the extent possible.

8. PRIORITY HANDLING OF SEVERE CASES

Cases involving child labour, forced labour, harassment, violence, safety risks, threats to life, or severe human rights impacts will receive immediate priority and escalation.

9. STEPS OF THE GRIEVANCE PROCESS

9.1 Step 1 – Receipt & Acknowledgement

Acknowledgement within 3 business days, unless submitted anonymously.

9.2 Step 2 – Initial Assessment (3 business days)

Categorization, urgency check, and determination of next steps.

9.3 Step 3 – Investigation (30–90 days depending on complexity)

Interviews, evidence review, site visits, and impartial fact-finding.

Investigations may involve a neutral internal expert or external independent investigator when required to ensure impartiality.

9.4 Step 4 – Outcome & Remedy

Corrective actions, restitution, training, disciplinary measures, or systemic changes.

Remedies will be proportionate to the nature and severity of the impact and developed, where appropriate, in consultation with affected stakeholders.

9.5 Step 5 – Appeal

A complainant may request escalation to senior management or an independent reviewer.

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Responsible: HR Manager

9.6 Step 6 – Closure & Monitoring

Confirmation of remedy implementation and review of trends for continuous improvement.

10. CONFIDENTIALITY & NON-RETALIATION

All grievances are handled confidentially and in compliance with data protection laws. Retaliation is strictly prohibited and triggers an immediate investigation.

This protection covers complainants, witnesses, representatives, and any individual supporting the process.

11. ROLES & RESPONSIBILITIES

- **HR Manager** – intake, coordination, and documentation, impartial fact-finding and interviews, collecting relevant evidence and, where necessary, engaging a neutral investigator or forwarding the report to the competent authority for further action.
- **Senior Management** – oversight, escalation, and appeals.
- **Compliance/ Audit Team** – annual evaluation and improvement of the mechanism. Ensures the mechanism functions independently and maintains stakeholder trust.

12. AWARENESS & COMMUNICATION

This procedure is publicly available on our website and communicated through onboarding, worker training and supplier briefings.

13. RECORD-KEEPING

All grievance records are maintained securely and retained in accordance with legal requirements by HR Manager. Non-identifiable summaries may be used for reporting and learning.

14. EXTERNAL MECHANISMS

All stakeholders retain the right to contact government authorities, legal bodies, certification bodies, or other external grievance platforms at any time.

Accessing external mechanisms may be done at any stage and does not require prior use of the company grievance procedure.