AVENUE TWO TRAVEL

Stakeholder Grievance & Complaints Procedure

1. Purpose and Scope

Avenue Two Travel is committed to conducting business ethically, safely, and with respect for the rights of everyone affected by our operations. This policy establishes a clear, accessible, and confidential grievance procedure through which any stakeholder — including employees, contractors, suppliers and vendors, clients and travelers, business partners, and members of the communities in which we operate — may raise a concern or complaint without fear of retaliation and receive a timely, fair response.

This policy is publicly available on the Avenue Two Travel website and is provided to employees as part of the employee handbook. It covers, among other things, complaints of harassment, discrimination, unethical or illegal conduct, unfair treatment, and violations of Company policy or applicable law.

2. Who Can Raise a Grievance

Any of the following may raise a grievance under this policy:

- Current or former employees
- Contractors, consultants, and temporary staff
- Suppliers, vendors, and business partners
- Clients and travelers
- Members of the community affected by Avenue Two Travel's operations

Grievances may be raised anonymously. Individuals are never required to identify themselves, although providing contact information allows the Company to follow up and share updates.

3. How to Raise a Grievance

Stakeholders may raise a concern through any of the following channels, whichever feels safest and most comfortable:

- Their immediate supervisor/manager, Human Resources, or any member of management
- The Company's designated Grievance Officer (see Section 10)
- The Grievance Form, published on the Avenue Two Travel website, submitted online or by email

Where an individual believes they have been subjected to prohibited conduct, and they feel safe doing so, Avenue Two Travel encourages promptly advising the other party that the behavior is unwelcome and requesting that it stop. This step is optional; anyone may proceed directly to a formal grievance instead.

Avenue Two Travel encourages the prompt reporting of grievances and concerns so that rapid and constructive action can be taken before relationships become strained. While there is no fixed deadline for reporting, early reporting leads to faster, more effective resolution.

4. Grounds for Accepting a Grievance

A grievance will be accepted for investigation under this policy when it involves a good-faith concern about any of the following:

- Harassment, discrimination, or retaliation
- Illegal, dishonest, or fraudulent activity (see Whistleblower Policy, Section 12)
- Violations of Company policy, code of conduct, or applicable law
- Unfair, unsafe, or unethical treatment of an employee, contractor, supplier, or client
- Adverse social, environmental, or community impacts connected to Avenue Two Travel's operations or supply chain

Complaints that fall outside these grounds (for example, general business disagreements unrelated to conduct, ethics, or legal compliance) may not be accepted as formal grievances. In that case, the individual will be told in writing why the matter was not accepted, and, where possible, will be directed to a more appropriate process.

5. Grievance Process and Timeline

Step	Action	Target Deadline
1. Acknowledgment	Receipt of the grievance is confirmed to the complainant (unless submitted anonymously with no contact method)	Within 7 business days
2. Eligibility Review	The Grievance Officer determines whether the matter meets the grounds in Section 4 and assigns an investigator	Within 15 business days
3. Investigation	Interviews are conducted with the parties involved and any individuals with relevant knowledge; evidence is gathered and reviewed	Within 45 calendar days
4. Resolution & Decision	A determination is made and appropriate corrective action, if any, is identified and communicated	Within 60 calendar days of acknowledgment
5. Appeal (if requested)	A party who disagrees with the resolution may appeal to the Human Resources Manager	Filed within 10 business days of decision; reviewed within 15 business days

Timelines may be extended in complex cases; if this occurs, the complainant will be told the reason for the delay and given a revised target date.

6. How Resolution Is Facilitated

Investigations are conducted promptly and impartially and may include individual interviews with the parties involved and, where necessary, with witnesses or others with relevant knowledge. Depending on the findings, resolution may involve:

- Facilitated conversation or mediation between the parties
- Corrective action or discipline, up to and including termination of employment or termination of a business relationship
- Changes to Company practices, policies, or supplier relationships to prevent recurrence
- No action, where the investigation does not substantiate the grievance, with the reasoning explained to the complainant

7. Confidentiality

Confidentiality will be maintained throughout the grievance and investigation process to the extent consistent with conducting an adequate investigation and taking appropriate corrective action. Information will be shared only with those who need it to investigate and resolve the matter.

8. Protection Against Retaliation

Retaliation against any stakeholder for raising a grievance in good faith, reporting harassment, discrimination, or illegal or dishonest activity, or participating in an investigation, is a serious violation of this policy and will itself be subject to disciplinary action, up to and including termination of employment or termination of a business relationship.

Prohibited retaliation includes, but is not limited to: termination, demotion, suspension, threats, adverse changes to compensation or work assignments, failure to hire or consider for hire, failure to give equal consideration in employment decisions, exclusion from opportunities, or otherwise denying any benefit because a stakeholder raised a concern in good faith.

Controls in place to prevent retaliation include: routing grievances through the Grievance Officer rather than the subject of the complaint, offering anonymous reporting channels, restricting knowledge of a complainant's identity to those directly involved in the investigation, and requiring management sign-off before any adverse action is taken against an employee who has recently raised or participated in a grievance.

Anyone who believes they are experiencing retaliation should report it immediately to Human Resources or the Grievance Officer; retaliation complaints are investigated with the same urgency as the original grievance.

This protection does not extend immunity for an individual's own wrongdoing that is separately alleged and substantiated.

9. Communication with the Complainant

Throughout the process, Avenue Two Travel will:

- Regularly communicate each step of the resolution process to the complainant (where contact information is available), including acknowledgment, eligibility determination, and outcome
- Confirm in writing when a grievance has been resolved and closed
- If a matter is not accepted as a grievance, explain in writing why it was not accepted and, where appropriate, refer the individual to another resource

10. Grievance Officer and Accountability

Avenue Two Travel's Human Resources Manager or designated person serves as the Company's Grievance Officer, with well-defined responsibility for:

- Receiving and logging all grievances in the Company's confidential Grievance Register
- Assigning an investigator and tracking each case to resolution against the timeline in Section 5
- Ensuring communication with complainants at each stage
- Monitoring for and preventing retaliation
- Preparing the annual grievance summary described in Section 11

11. Tracking, Monitoring, and Annual Reporting

Every grievance received, regardless of channel, is logged in a confidential Grievance Register that records the date received, nature of the concern, individual assigned, key milestones, and outcome. This register allows the Company to track each grievance to resolution and assign clear accountability.

Each year, the Grievance Officer prepares an internal annual summary of grievance activity, including the number and general subject matter of grievances received, their status (open/closed), and average time to resolution. Where no grievances were filed in a given year, the summary confirms that the grievance procedure and tracking system remained in place and available throughout the year.

Evidence that a grievance has been resolved and closed (such as the completed Grievance Register entry and written confirmation to the complainant) is retained to demonstrate the effectiveness of this procedure.

12. False or Malicious Complaints

False and malicious grievances of harassment, discrimination, retaliation, or illegal/dishonest activity may be the subject of appropriate disciplinary action, up to and including termination of employment. This does not apply to grievances made in good faith that are ultimately not substantiated.

13. Whistleblower Policy

A whistleblower, as defined by this policy, is any employee, contractor, supplier, or other stakeholder of Avenue Two Travel who reports an activity they consider to be illegal or dishonest through the channels described in Section 3. The whistleblower is not responsible for investigating the activity or determining fault or corrective measures; appropriate management officials are responsible for that.

Examples of illegal or dishonest activity include violations of federal, state, or local law; billing for services not performed or goods not delivered; and other fraudulent financial reporting.

Anyone with knowledge of or a concern about illegal, dishonest, or fraudulent activity should contact their immediate supervisor, the Human Resources Manager/Grievance Officer, or use the Grievance Form. Sound judgment should be used to avoid baseless allegations; anyone who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections cover confidentiality and protection against retaliation. Confidentiality will be maintained where possible; however, identity may need to be disclosed to conduct a thorough investigation, comply with the law, and provide accused individuals their legal rights of defense. Avenue Two Travel will not retaliate against a

whistleblower, including through adverse employment action such as termination, demotion, compensation decreases, poor work assignments, or threats of physical harm. Anyone who believes they are experiencing retaliation for whistleblowing should contact the Human Resources Manager/Grievance Officer immediately. This protection does not extend immunity for any personal wrongdoing that is separately alleged and investigated.