

Prosel Ltd

Human Rights and Environmental Grievance Procedure

1. Background

Prosel Ltd commits to working with parties to resolve complaints and conflicts in its own operations and supply chain through an open, accessible, transparent and consultative process. Under our grievance framework, when internal or external stakeholders raise concerns about sustainability, human rights, or environmental practices (relating to Prosel Ltd or our suppliers or business partners), we will deploy a holistic grievance approach to address those concerns in a timely, transparent, equitable and participatory manner. Implementing an effective grievance mechanism is part of being a responsible global citizen, in line with our Prosel Ltd Code of Conduct & Guiding Principles, Prosel Ltd Human Rights Policy, Prosel Ltd Supplier Code of Conduct and Corporate Due Diligence Policy.

Prosel Ltd will continue to consult with stakeholders and potentially affected rights holders and review its grievance process on a regular basis to ensure effectiveness, in line with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

2. Objectives

Prosel Ltd's human rights and environmental grievance process serves as a guide to ensure that grievances are received, addressed, solved, and monitored across Prosel Ltd's supply chains and own operations. It aims to provide a clear, predictable, and effective course of action. The complaints procedure enables persons to report human rights and environmental risks related to Prosel Ltd's own business operations, or those of a Prosel Ltd supplier or other business partner.

It is our goal to build trust-based relationships with ethical suppliers and business partners who comply with our Supplier Code of Conduct. We engage and support our suppliers and business partners in addressing non-compliance through time-bound action plans. If a supplier or business partner refuses to engage in this grievance process or subsequent remediation process in good faith, Prosel Ltd will reserve the right to cease business relations with them.

3. Scope

This process covers human rights and environmental grievances related to Prosel Ltd's own operations and all products and services Prosel Ltd procures. It applies to all suppliers and business partners in Prosel Ltd's supply chain, direct and indirect. A **"Supplier"** is defined as a person or business that provides a product or service to Prosel Ltd.

This includes, but is not restricted to, direct suppliers, indirect suppliers, third party contracting entities, etc. A “**grievance**” is a complaint or concern, associated with Prosel Ltd’s business, which an individual or a group seeks to address with Prosel Ltd. Grievances will be managed through Prosel Ltd’s Ethics Open Line system.

4. Process

Prosel Ltd has a long-standing Ethics Open Line accessible through our website <https://prosellimited.com/contact-us/> . Our Contact Section is confidential and available 24 hours a day, 7 days a week in multiple languages. It provides mechanisms for anonymous reporting.

Prosel Ltd’s overall approach includes recording grievances, verifying claims, addressing confirmed issues, delivering responses to stakeholders, managing and monitoring follow-up actions, and reporting key performance indicators to stakeholders.

When a report regarding a third-party supplier is submitted to Prosel Ltd, we will engage the grievance raiser and the grievance subject (if and as appropriate) to discuss the issues raised. This will be done in accordance with this process, with the objective of evaluating the matters raised and to find the best ways to address them.

5. Grievance-Raising Procedure

Anyone can submit a grievance through Prosel Ltd’s Ethics Open Line (i.e. Prosel Ltd Website Contact Section). We strongly recommend utilizing Prosel Ltd’s Ethics Open Line to ensure that a grievance is timely considered and addressed. We take reports of potential misconduct seriously, and we handle investigations promptly, fairly, and as confidentially as possible.

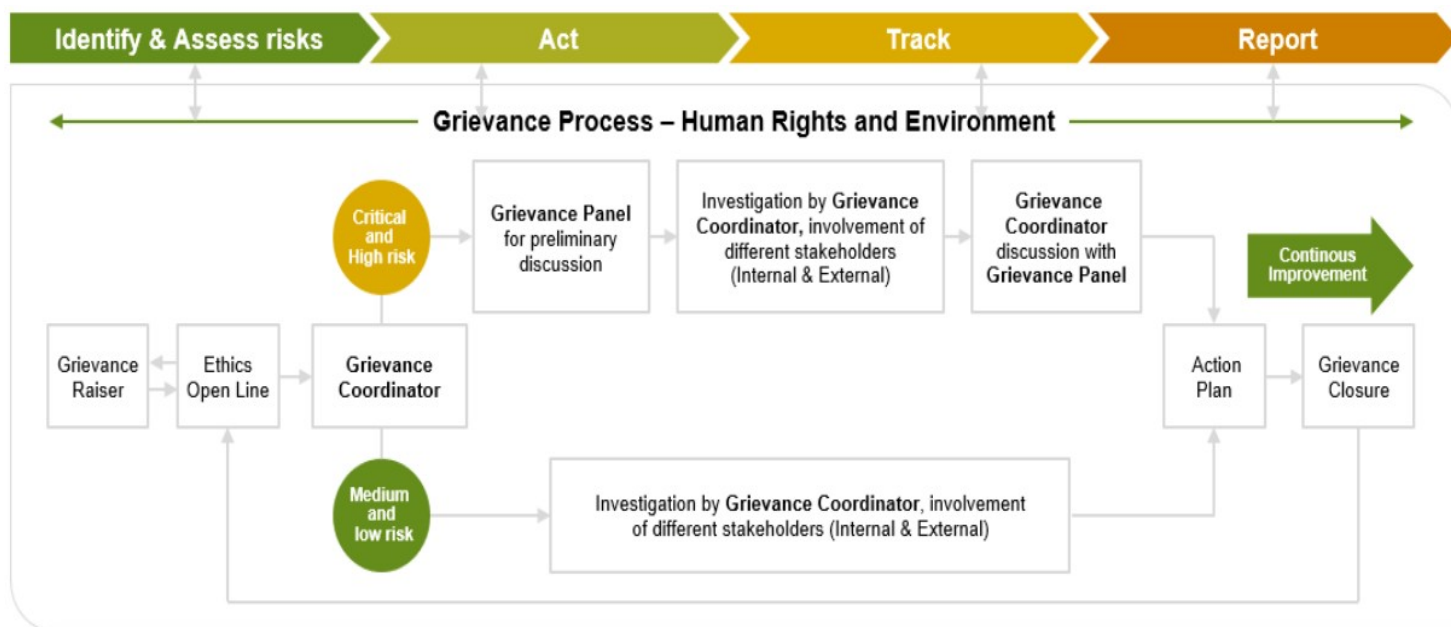
Grievances shared with Prosel Ltd in any other way (e.g., through social media, email, letter, or otherwise) should be routed by the grievance recipient through the Ethics Open Line. A person reporting a grievance may remain anonymous or appoint a third-party to act as their agent and assist them in articulating their grievance.

It is our preference that persons raising grievances identify themselves, so we can follow up with questions or ask for additional information or clarification, if necessary.

Prosel Ltd will acknowledge receipt of a grievance. When appropriate, the persons entrusted with the implementation of this procedure will discuss the facts with the grievance raiser and will notify them when the grievance investigation has been completed. Critical and high-risk allegations will proceed through a grievance panel process. Medium and low-risk allegations will be investigated and reported. See section 6.

Prosel Ltd prohibits harassment, intimidation, and the use of violence by any employee, supplier, third party and contractor throughout engagement in the Grievance Procedure. Prosel Ltd will not tolerate retaliation against anyone who, in good faith, raises a concern or participates in an investigation or whistleblowing.

6. Grievance Procedure Process Flow



7. References

This Grievance Process is based on and in alignment with the following guidelines:

- Prosel Ltd Code of Conduct & Guiding Principles
- Prosel Ltd Supplier Code of Conduct
- Prosel Ltd Human Rights Policy

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Hemim Shah
Director

Last date of review: May 2025