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Grievance Policy and Procedure

Version 1.1: extended to external stakeholders. Aligned to the Acas Code of Practice on Disciplinary and Grievance Procedures

Document owner	Director / Founder
Applies to	All employees and workers (Parts A-B) and all external stakeholders, clients, suppliers, freelancers, community members and members of the public (Part C)
Version	1.1 (supersedes v1.0, June 2026)
Effective date	9 November 2026
Approved by	Board of Directors, 9 November 2026
Next review	November 2027
Public availability	Part C and the summary are published at https://www.twisthealth.tech/about-8
Status	Non-contractual

What changed in version 1.1

- New Part C, Stakeholder Grievance Procedure for external stakeholders (clients, suppliers, freelancers, community, public), with a dedicated public channel, timelines, confidentiality and anti-retaliation protections (PSG3.1.1-3.1.3).
- New section 15, Grievance register, monitoring, tracking and annual summary (PSG3.2.1, 3.2.3).
- Section 12 updated to name the public grievance channel.
- Signature block completed (v1.0 was issued unsigned).

PART A: Purpose, scope and principles

1. Purpose

Twist Health Limited ("Twist Health", "the Company", "we" or "us") is committed to fostering a fair, respectful and professional working environment in which everyone is treated with dignity. We recognise that, from time to time, individuals may have concerns, problems or complaints about their work, their working conditions or their relationships with colleagues, and that people outside the company who are affected by what we do may also have concerns, that they wish to raise and have addressed.

The purpose of this policy is to provide a clear, consistent and confidential framework through which such concerns can be raised safely and resolved promptly and fairly. We encourage open communication and will always try to resolve concerns informally wherever possible, but where that is not appropriate or has not worked, this procedure sets out the formal route.

Parts A and B comply with the Acas Code of Practice on Disciplinary and Grievance Procedures. Part C extends an equivalent process to external stakeholders in line with our B Corp commitment to all stakeholders (Article 3 of our Articles of Association).

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2. Scope and status of this policy

Parts A and B apply to all employees of Twist Health Limited regardless of length of service and are also made available to other workers, contractors and freelance personnel engaged by the Company. Part C applies to any external stakeholder affected by our business: clients and their employees, suppliers and freelancers, community organisations, charity partners, and members of the public, including patients and healthcare professionals who encounter our work.

This policy does not form part of any employee's contract of employment and we may amend, withdraw or replace it at any time. It does not apply to: complaints about disciplinary action or dismissal (Disciplinary Policy); whistleblowing in the public interest (raise with a director or under the Whistleblowing Policy where one exists); collective grievances raised by a representative on behalf of two or more employees (separate collective process). Complaints of bullying, harassment or discrimination may be raised under this procedure and will be handled with particular sensitivity.

3. What is a grievance?

A grievance is a concern, problem or complaint that you raise with the Company about your work, your working environment, your terms and conditions, your working relationships, or, for external stakeholders, about the Company's conduct, services, communications, payment practices, environmental or social impact, or treatment of you. Grievances can cover a wide range of issues, including but not limited to: terms and conditions, pay or benefits; health, safety and the working environment; working practices, workload or hours; the behaviour or conduct of managers, colleagues or third parties, including bullying, harassment or discrimination; the application of Company policies, or perceived unfair treatment; late payment or unfair contract terms (suppliers and freelancers); inaccurate, misleading or inappropriate communications produced by us; any human rights, data-protection or environmental concern about our operations or supply chain.

Given the regulated, deadline-driven nature of our work in pharmaceutical brand communications, we would always rather hear about a concern early so that it can be resolved before it affects you or your work.

4. Our guiding principles

- **Promptness.** Grievances are dealt with without unreasonable delay; meetings, decisions and outcomes are communicated as quickly as reasonably practicable.
- **Fairness and consistency.** Grievances are handled fairly, consistently and objectively; you are given a fair opportunity to explain your concerns before any decision is reached.
- **Confidentiality.** Information is kept confidential so far as reasonably practicable and shared only with those who genuinely need to be involved.
- **Impartiality.** Wherever possible the person hearing a grievance, and any appeal, will not have been directly involved in the matter complained of.
- **Right to be accompanied.** Employees and workers may be accompanied at formal meetings (section 9); external stakeholders may be supported by a representative of their choice.
- **No detriment or retaliation.** No one, employee, worker or external stakeholder, will be treated less favourably, penalised, denied work or business, or otherwise retaliated against for raising a genuine grievance in good faith, or for supporting or giving evidence in one. Victimisation of anyone who raises or is involved in a grievance is a disciplinary matter for employees and a breach of contract for suppliers.
- **Accessibility.** Grievances may be raised verbally, in writing, by email or through the website form; we will make reasonable adjustments (for example a different format, language or a support person) so that anyone can use this procedure.

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PART B: Employees and workers

5. Overview of the procedure

Stage	What happens	Indicative timeframe
Informal	Raise the concern verbally with your manager or a director.	As soon as possible after the issue arises.
Stage 1	Put the grievance in writing (Appendix A); a grievance meeting is held; a written decision is given.	Meeting normally within 5 working days; decision normally within 5 working days of the meeting.
Stage 2	If dissatisfied with the Stage 1 outcome, appeal; an appeal meeting is held; a final written decision is given.	Appeal within 5 working days of the decision; meeting normally within 5 working days; outcome normally within 5 working days of the meeting.

All timeframes are indicative targets. Where it is not possible to meet them, for example because a relevant person is absent or the matter requires investigation, we will tell you and agree a revised, reasonable timescale.

6. Informal resolution

Many concerns can be resolved quickly and informally through open and honest discussion, and we strongly encourage you to use this route first. Raise it with your line manager as soon as possible; if your concern is about your line manager, or you do not feel able to approach them, raise it with a director. Explain what the problem is and, where you can, what you would like to happen to put it right. Raising a matter informally does not prevent you from raising it formally later, and you are not obliged to use the informal route if the matter is too serious for it.

7. Formal procedure: Stage 1

7.1 Putting your grievance in writing. Set out the nature of your grievance and its background (dates, names), any evidence or witnesses, what steps you have already taken, and the outcome you are seeking. Use the form at Appendix A or write a letter or email. Submit it to your line manager, or to a director if the grievance concerns your line manager. As we have no dedicated HR function, a director oversees the proper handling of every grievance and may obtain independent HR or legal advice.

7.2 Investigation. It may be necessary to investigate before or after the grievance meeting; this may involve reviewing documents and interviewing you and any witnesses. You are expected to co-operate fully and promptly and to treat the matter confidentially. Witness statements may be anonymised where there is a genuine, well-founded concern about the consequences of identification.

7.3 The grievance meeting. Normally held within five working days of receiving the written grievance, in private, chaired by your manager or a director (the "grievance manager") who, where possible, has not been directly involved. You must take all reasonable steps to attend and have the right to be accompanied (section 9). The meeting may be adjourned for further investigation.

7.4 The decision. The grievance manager confirms the decision in writing, normally within five working days of the meeting, explaining the decision, the reasons and any action to be taken, and your right of appeal. Possible outcomes: upheld in full or in part, not upheld, or upheld with

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remedial action (changes to working arrangements, mediation, training, or referral to the Disciplinary Policy).

8. Formal procedure: Stage 2 (Appeal)

Set out your grounds of appeal in writing to a director, normally within five working days of receiving the written decision. Wherever possible the appeal is heard by a director not involved in the original decision; where the size of the Company makes complete impartiality impossible, the person hearing the appeal will act as fairly and objectively as they can and may obtain independent advice. An appeal meeting is normally held within five working days; the final decision is confirmed in writing, normally within five working days of the meeting. The appeal decision is final.

9. The right to be accompanied

You may be accompanied at any formal grievance or appeal meeting by a work colleague, a certified trade union representative or a trade union official. Tell us in advance who your companion will be. Your companion may make representations, sum up your case, respond on your behalf and confer with you, but may not answer questions on your behalf. If your companion is unavailable you may propose an alternative reasonable time within five working days.

10. Records, confidentiality and data protection

We keep a written record of every grievance in the Grievance Register (section 15): the nature of the grievance, what was decided, action taken and reasons, whether an appeal was raised and its outcome, and any subsequent developments. Correspondence and meeting notes are retained. Records are confidential and held in accordance with UK GDPR and the Data Protection Act 2018, processed only to deal with the grievance and kept no longer than necessary. Everyone involved must maintain confidentiality; breach may be a disciplinary matter.

11. Special situations

Grievances raised during disciplinary proceedings may lead to the disciplinary process being suspended or the matters being dealt with concurrently. Grievances after employment has ended may use a modified written procedure. We may suggest voluntary, confidential mediation by an impartial third party. Overlapping or multiple grievances may be dealt with together where fair and practical.

12. Who to contact

Informal concern (employees/workers)	Your line manager, or a director if the concern involves your manager.
Formal grievance, Stage 1	Your line manager, or a director where the manager is involved.
Appeal, Stage 2	A director not involved in the Stage 1 decision, wherever possible.
Confidential / sensitive matters	Any director, who may arrange independent HR or legal support.
External stakeholders (Part C)	Email: info@twisthealth.tech website: https://www.twisthealth.tech/contact-5 (select "Raise a concern"); post: Twist Health Limited, 8 Queen Street, Twyford, Winchester SO21 1QG, marked "Grievance, Confidential"; or any director.

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13. Review of this policy

This policy is reviewed annually by the Board, or sooner where the law, the Acas Code or the needs of the business change. Employees and published stakeholders are notified of material changes.

PART C: Stakeholder Grievance Procedure (external stakeholders)

14. Procedure for clients, suppliers, freelancers, community and the public

14.1 Who can use this procedure. Anyone outside Twist Health who is affected by our business, including the employees of our clients, our suppliers and freelancers, community organisations and charity partners, patients, carers, healthcare professionals and members of the public.

14.2 What you can raise. Any concern about Twist Health's conduct, services or communications; late or unfair payment; contract terms; the behaviour of our people; a human rights, labour, data-protection, ethical-marketing or environmental concern about our operations or supply chain; or any failure to live up to our published commitments (B Corp, JEDI, Human Rights, Climate Action, Responsible Marketing).

14.3 How to raise it. Use any of the channels in section 12 (email, website form, post or a director). You may raise a concern anonymously, although this may limit our ability to investigate and respond. You may be supported by a representative of your choice.

14.4 What happens next.

Step	What we do	Timeframe
Acknowledge	We acknowledge receipt, log the grievance in the Grievance Register, assign a reference number and name the director handling it.	Within 3 working days
Investigate	The handling director gathers the facts, speaks to you (by phone, video or in writing, as you prefer) and to anyone else involved. Where the grievance concerns a director, another director or an independent adviser handles it.	Normally within 10 working days
Respond	We give you a written response explaining what we found, our decision and any action we will take, with reasons. If we cannot accept the grievance (for example it falls outside our control) we explain why and, where possible, point you to the right body.	Normally within 15 working days of acknowledgement
Review	If you are dissatisfied you may ask for a review by a director not previously involved (or an independent adviser where that is impossible). The review decision is final within the Company.	Request within 10 working days; decision normally within 10 working days
Close and learn	We record the outcome and any lessons in the register and, where relevant, change our policies or practices.	On closure

14.5 Confidentiality and protection from retaliation. Your grievance is handled in confidence and shared only with those who need to be involved. We will not withdraw business, delay payment, end a contract, make a negative reference, or otherwise disadvantage any client,

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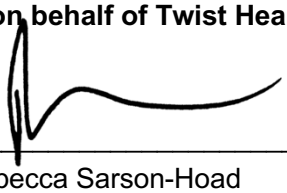
supplier, freelancer or individual because they raised a concern in good faith. Any Twist Health employee who retaliates against an external stakeholder is subject to disciplinary action. If you believe you have been retaliated against, tell any director immediately.

14.6 External routes. This procedure does not affect your legal rights. Depending on the matter you may also contact the PMCPA (ABPI Code complaints), the BHBIA, the Advertising Standards Authority, the Information Commissioner's Office, or B Lab's public complaints process for B Corps.

15. Grievance register, monitoring, tracking and annual summary

- All grievances (internal and external, informal and formal) are logged in the Grievance Register maintained by the Managing Director in the confidential HR area of SharePoint, with: reference, date received, source (employee / worker / client / supplier / community / public), subject category, handling director, actions, dates of each stage, outcome, appeal/review, closure date and lessons learned.
- The Managing Director reviews open grievances monthly to ensure timelines are met.
- The Board reviews the register at least annually at the purpose and impact review and records in the minutes the number of grievances by status and subject, average time to resolve, and any systemic issues. An anonymised annual summary is included in the B Corp Impact Report.
- Where no grievances have been received, a nil return is recorded and signed for the year.

Adopted on behalf of Twist Health Limited:

Signed: 

Name: Rebecca Sarson-Hoad

Position: Managing Director

Date: 9 November 2026

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Appendix A: Grievance submission form (employees, workers and external stakeholders)

Your name (optional for external stakeholders)	
Organisation / relationship to Twist Health	[Employee / worker / client / supplier / freelancer / community / public]
Contact details	
Date of submission	
Who are you submitting this to?	
Details of your grievance (what happened, when, who was involved)	
Steps already taken to resolve it informally	
Witnesses or supporting evidence	
Outcome or remedy you are seeking	
Signed / date	

Appendix B: Procedure at a glance

1. Informal: raise your concern with your manager, a director, or (external) via info@twisthealth.tech.
2. Written grievance: if unresolved, put it in writing (Appendix A).
3. Meeting / investigation: within 5 working days (employees) or acknowledgement within 3 and investigation within 10 working days (external).
4. Decision in writing, with reasons and the right to appeal / review.
5. Appeal / review by a director not previously involved. Final.
6. Logged, tracked and summarised annually to the Board.

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