



INNOVATECH

GRIEVANCE & WHISTLEBLOWING MECHANISM

Applies to: All employees, officers, contractors, suppliers, and business partners, and potentially affected external stakeholders

Version	Effective Date	Description of Changes	Prepared by	Reviewed By	Approved by	Remarks
INN-1.0	Dec-22-2025	Initial Issue	Compliance & Ethics Function	Virginia Albornoz	Yrabell Romay	Issued for Review

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INNOVATECH Grievance & Whistleblowing Mechanism

1. Purpose

INNOVATECH provides a grievance and whistleblowing mechanism to enable employees, business partners, supply chain workers, and external stakeholders to report concerns safely and confidentially. The mechanism supports early identification of issues and enables corrective action and remediation where appropriate.

This mechanism aligns with INNOVATECH's Human Rights Policy, Code of Conduct & Ethics, and Human Rights Due Diligence Procedure.

2. Availability & Who Can Use This Mechanism

This mechanism is available to:

- Employees and officers
- Contractors and consultants
- Supplier and subcontractor workers
- Business partners and customers
- **External affected parties**, including community members potentially impacted by INNOVATECH-related projects or business relationships

Reports may be submitted in good faith. False or malicious reporting may be addressed under applicable policies.

3. Issues Covered

Concerns may include (but are not limited to):

- Human rights violations (child labor, forced labor, trafficking, discrimination, harassment)
- Labor concerns (working hours, wages, freedom of association, unfair treatment)
- Occupational health and safety issues
- Misuse of security forces or threats/intimidation
- Unlawful eviction or unauthorized appropriation of land, forest, or water
- Environmental harm with potential human rights impacts (e.g., pollution affecting communities)
- Corruption, bribery, fraud, conflicts of interest
- Data protection, privacy, or confidentiality breaches
- Any violation of INNOVATECH policies, laws, or contractual obligations

4. Reporting Channels

1. Email:compliance@innovatechfinder.com
2. **Management escalation:** to a manager or project lead, who must forward the concern to Compliance
3. **Supplier escalation:** suppliers may report directly via the email channel above
4. Confidential handling guaranteed

Where feasible, reports may be submitted without including the reporter's identity. If contact information is provided, INNOVATECH will use it only to investigate and provide updates.

5. Confidentiality, Anonymity & Non-Retaliation

Confidentiality

INNOVATECH treats reports confidentially to the extent possible. Information is shared only with individuals who need it to investigate and address the concern.

Non-Retaliation

Retaliation against any individual who raises a concern in good faith is strictly prohibited. Any retaliation will be treated as a serious violation and may result in disciplinary action or termination of contracts.

6. How Reports Are Handled (Process & Timelines)

INNOVATECH handles reports using a consistent process:

1. **Receipt & Logging:** All reports are recorded by the Compliance & Ethics Function.
2. **Acknowledgment:** Where contact details are provided, INNOVATECH acknowledges receipt within **5 business days**.
3. **Initial Review & Triage:** The report is assessed for severity, urgency, and risk.
4. **Investigation:** The Compliance function coordinates an investigation, which may involve HR, Procurement, Operations, or external support where necessary.
5. **Outcome & Actions:** Corrective actions and remediation steps are defined and assigned.
6. **Closure:** Where possible, the reporter is informed of the outcome (subject to confidentiality and legal constraints).

Target timeline: INNOVATECH aims to close investigations within **30-45 days**, depending on complexity.

7. Remediation & Corrective Actions

Where adverse impacts are identified, INNOVATECH will take appropriate action, which may include:

- Corrective action plans with timelines
- Supplier remediation requirements
- Contractual remedies, including suspension or termination for serious violations
- Support for appropriate remediation consistent with INNOVATECH's due diligence responsibilities

8. Documentation & Record Retention

INNOVATECH maintains grievance documentation securely and retains relevant records for **at least seven (7) years**, unless a longer period is required by law or contract.

9. Communication & Awareness

INNOVATECH communicates the availability of this mechanism through:

- Employee onboarding and policy distribution
- Supplier onboarding and contractual documentation
- Availability upon request to external stakeholders where relevant

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10. Contact

Compliance Contact: compliance@innovatechfinder.com

Website: www.innovatechfinder.com