



**SORINTEQ**  
ACADEMY

## **Sorinteq Academy Limited: Compliance and Appeals Policy**

**Policy Statement:** Sorinteq Academy Limited is dedicated to upholding high standards of compliance with internal policies, industry regulations, and legal requirements. This Compliance and Appeals Policy outlines the principles and procedures for addressing concerns related to compliance and providing a fair and transparent process for individuals to appeal decisions made by the company.

**Scope:** This policy applies to all employees, contractors, clients, and stakeholders associated with Sorinteq Academy Limited.

### **Key Principles:**

1. **Compliance Standards:** Sorinteq Academy Limited is committed to complying with all applicable laws, regulations, and industry standards. All employees are expected to adhere to the company's internal policies and procedures.
2. **Reporting Concerns:** Individuals are encouraged to report any concerns or suspected violations of compliance to their supervisor, manager, or a designated compliance officer. Sorinteq Academy Limited is committed to creating an environment where individuals can raise concerns without fear of retaliation.
3. **Investigation and Resolution:** Reported concerns will be promptly and thoroughly investigated. Investigations will be conducted impartially and confidentially to the extent permitted by law. The findings will be used to determine appropriate corrective actions.
4. **Appeals Process:** Sorinteq Academy Limited provides an appeals process for individuals who are dissatisfied with the outcome of a compliance investigation or decision. This process ensures a fair and transparent review of decisions made by the company.

#### Filing an Appeal:

1. **Initiating an Appeal:** Individuals wishing to appeal a compliance decision must submit a written appeal to the designated appeal officer within a specified timeframe, clearly stating the grounds for the appeal and providing any supporting documentation.
2. **Appeal Officer:** Sorinteq Academy Limited will designate an impartial appeal officer or committee responsible for reviewing appeals. This individual or committee will not have been involved in the original compliance decision.
3. **Review Process:** The appeal officer or committee will review the appeal, conduct any necessary additional inquiries, and make a determination based on the information provided. The decision of the appeal officer or committee will be final.
4. **Communication of Decision:** Sorinteq Academy Limited will communicate the decision of the appeal to the individual in writing, providing a clear explanation of the reasons for the decision.

**Non-Retaliation:** Sorinteq Academy Limited strictly prohibits retaliation against individuals who report compliance concerns in good faith or participate in the appeals process. Any form of retaliation will be treated as a serious violation of company policy.

**Review and Update:** This Compliance and Appeals Policy will be regularly reviewed and updated to ensure its continued relevance and effectiveness in light of changes in the business environment, legal requirements, or industry best practices.

*Effective Date: 1<sup>st</sup> January 2024*

*Review Date: 31<sup>st</sup> December 2024]*

*Version: V3.*