

# GENUMARK INC.

## Grievance and Complaints Mechanism

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<b>Document Owner</b>	Chief Executive Officer
<b>Approved By</b>	Mitch Freed, CEO
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### 1. Purpose

Genumark Inc. is committed to operating with integrity, transparency, and accountability. This Grievance and Complaints Mechanism establishes a structured, accessible process for any stakeholder to raise concerns, complaints, or grievances related to Genumark's business activities, operations, or conduct.

This mechanism supports our commitment as a certified B Corporation to high standards of social and environmental performance, and aligns with B Lab Global's requirements for companies serving clients in controversial and ineligible industries.

### 2. Scope

This mechanism applies to all stakeholders, including:

- Employees and contractors of Genumark Inc.
- Clients and prospective clients
- Suppliers, vendors, and business partners
- Community members and members of the public
- Any individual or organization affected by Genumark's operations

Grievances may relate to any aspect of Genumark's business activities, including but not limited to: working conditions, environmental impact, ethical conduct, client relationships, supply chain practices, and compliance with applicable laws and standards.

### 3. How to Submit a Grievance

Genumark provides multiple channels to ensure the mechanism is accessible to all stakeholders:

- Online Grievance Form: Available at [genumark.com/grievance](https://genumark.com/grievance), accessible 24/7
- Email: [grievances@genumark.com](mailto:grievances@genumark.com)

- Mail: Genumark Inc., Attention: Grievance Review Committee, 707 Gordon Baker Road, Toronto, ON, M2H 2S6
- In Person: Any employee may raise a concern directly with their manager, People & Culture (P&C), or a member of the Grievance Review Committee
- Anonymous Submission: Stakeholders may submit grievances anonymously through the online form or by mail without identifying themselves

Grievances may be submitted in English or French.

## 4. Grounds for Accepting a Grievance

A grievance will be accepted for review if it relates to a specific, identifiable concern about Genumark's operations, conduct, or impact. Examples include:

- Alleged violations of Genumark's Code of Conduct or company policies
- Concerns about workplace health, safety, or working conditions
- Environmental concerns related to Genumark's operations or supply chain
- Allegations of discrimination, harassment, or unfair treatment
- Ethical concerns about client relationships or business practices
- Concerns about compliance with laws, regulations, or B Corp standards
- Allegations of fraud, corruption, or financial misconduct

A submission may be declined if it is anonymous and lacks sufficient detail for investigation, relates to matters outside Genumark's control or responsibility, duplicates a previously resolved grievance with no new information, or constitutes an inquiry or feedback rather than a grievance (in which case it will be redirected to the appropriate department).

## 5. Grievance Process

### Step 1: Acknowledgement (within 5 business days)

Upon receipt of a grievance, the Grievance Review Committee will acknowledge the submission in writing within five business days (unless submitted anonymously). The acknowledgement will confirm that the grievance has been received, assign a reference number, identify the assigned reviewer, and provide an estimated timeline for initial assessment.

### Step 2: Initial Assessment (within 10 business days)

The assigned reviewer will conduct an initial assessment to determine whether the submission meets the grounds for acceptance. If accepted, the complainant will be informed of the next steps and expected timeline. If not accepted, the complainant will receive a written rationale explaining why the submission does not meet the grounds for a formal grievance, along with alternative avenues for their concern if applicable.

### Step 3: Investigation (within 30 business days)

Accepted grievances will be investigated by the Grievance Review Committee or a designated investigator. The investigation may include interviews with relevant parties, document review, site visits, or consultation with external experts as warranted. The complainant will receive a status update at minimum every 10 business days during the investigation.

## **Step 4: Resolution (within 10 business days of investigation completion)**

Upon completion of the investigation, the Grievance Review Committee will determine an appropriate resolution. The resolution may include corrective action, changes to policies or procedures, remediation measures, or a determination that no further action is required. The complainant will be notified in writing of the outcome, including the rationale for the resolution and any actions taken.

## **Step 5: Appeal**

If the complainant is not satisfied with the resolution, they may submit a written appeal within 15 business days of receiving the outcome. Appeals will be reviewed by a senior member of leadership not previously involved in the grievance. A final determination will be communicated within 20 business days of receiving the appeal.

## **6. How Resolutions Are Facilitated**

Genumark will pursue resolutions that are fair, proportionate, and aimed at preventing recurrence. Resolutions may include:

- Mediation or facilitated dialogue between parties
- Corrective or disciplinary action
- Policy or process changes
- Training or education programs
- Financial remediation where appropriate
- Referral to external authorities or regulators where required by law

## **7. Protection from Retaliation**

Genumark strictly prohibits any form of retaliation against any person who submits a grievance, participates in an investigation, or cooperates with a grievance process in good faith. Retaliation includes, but is not limited to: termination, demotion, reduction in compensation, reassignment, intimidation, harassment, or any other adverse action taken because of a grievance filing.

Any individual who believes they have experienced retaliation should report it immediately through any of the channels listed in Section 3. Allegations of retaliation will be treated as a separate grievance and investigated promptly. Individuals found to have engaged in retaliation will be subject to disciplinary action, up to and including termination. For additional protections, refer to Genumark's Whistleblower Protection Policy.

## **8. Confidentiality**

All grievances will be handled with the highest degree of confidentiality. Information will be shared only with those individuals who have a legitimate need to know in order to investigate or resolve the grievance. Before sharing information with parties beyond the initial reviewer, the Grievance Review Committee will inform the complainant about who will be involved and, where possible, seek their consent. The identity of the complainant will be protected throughout the

process unless disclosure is required by law or is necessary to conduct a fair investigation, in which case the complainant will be notified in advance.

## **9. Record Keeping and Reporting**

Genumark will maintain confidential records of all grievances submitted, including the nature of the grievance, the process followed, the outcome, and any corrective actions taken. Aggregate, anonymized data on grievance activity will be reported to senior leadership on a quarterly basis and used to identify systemic issues and drive continuous improvement. Records will be retained for a minimum of five years.

## **10. Governance and Oversight**

The Grievance Review Committee is responsible for the administration of this mechanism. The Committee reports to the CEO and consists of representatives from People & Culture, Operations, and a senior leader designated by the CEO. This policy will be reviewed annually by the Grievance Review Committee and updated as necessary to reflect changes in law, best practices, or organizational needs.

## Approval

This Grievance and Complaints Mechanism has been reviewed and approved by the undersigned on behalf of Genumark Inc.



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**Mitch Freed**

Chief Executive Officer, Genumark Inc.

Date: March 31, 2026