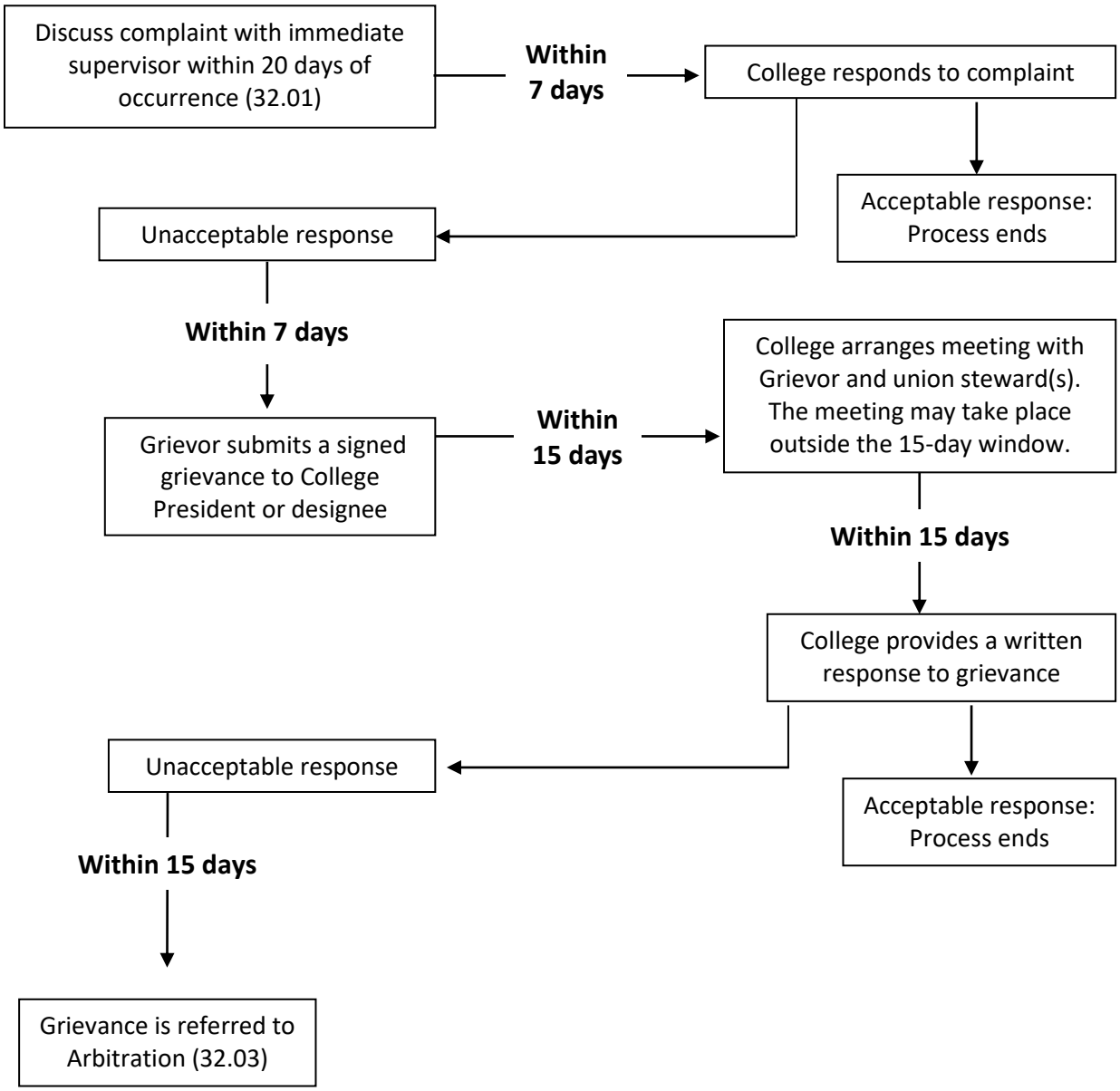Article 32 – Grievance Process