

Policy Number-

**Grievance Redressal Policy for WEL-MEPL
Employees**

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1. Purpose:

Welspun Enterprises Limited (WEL), all its associates JVs, and subsidiary companies as an organization recognizes that employees may have a grievance related to their employment for which they wish to seek redressal. The aim of this policy is to help resolve workplace differences fairly, quickly and as close as possible to the point of origin with a real focus on informal resolution and mediation. If problems cannot be resolved informally then this procedure outlines the formal procedure that can be used to resolve a grievance in the workplace.

2. Objective:

WEL, all its associates JVs, and subsidiary companies believe that all employees should be treated fairly and with respect. This policy is required to ensure that WEL has a process to resolve workplace grievances against peers and seniors. This policy and procedure describe the process of raising a grievance and the process by which the same will be responded and resolved.

3. Scope:

Any kind of Grievances excluding those related to sexual harassment of all employees of WEL or any of its associates JVs, and subsidiary companies or related to integrity breach. Grievances related to sexual harassment shall be handled through Internal Complaints Committee under the Prevention of Sexual Harassment Act and the integrity breach will be dealt with through the whistle blower policy.

4. Definition of Grievance:

A grievance is a specific grievance among the employees concerning matters related to:

- a) Unfair treatment of employee by any peer or senior including her/his manager.
- b) Grievance against any perceived unfairness like dissatisfaction, the feeling of injustice faced by her or him by any department within the organization.
- c) A grievance may also involve unfair bullying and/or harassment.

5. Glossary:

For the purpose of this policy the following terms are defined as:

- a) The complainant: The person raising the grievance.
- b) The respondent: The person against whom the grievance is being raised.
- c) Conciliator: The person who will discuss with both the parties and propose a solution to end the conflict
- d) Mediator: The person who assists the parties throughout the mediation process to help them find a solution to their dispute by themselves.

Mediation and Conciliation refer to the dispute resolution process in which two or more parties attempt to reach an amicable agreement with the help of a third party.

6. Committee for Grievance Resolution:

There is an eight-member committee to resolve any workplace-based grievance that an employee may be facing. At least any 4 (four) will be required to form a quorum. The chairperson will decide the quorum.

The committee list will be reviewed every year for change if required.

7. Responsibilities of the Chairperson:

- a) To be the process owner
- b) To convene the meeting of the Committee and also to invite the Complainant(s) and Respondent(s) as required
- c) To assign responsibilities to the committee members related to grievance resolution.

8. Process for reporting grievance:

If an employee has a grievance, s/he should have an informal talk with their reporting manager / HOD / HCGA, they will discuss the grievance raised in confidence and attempt to resolve the issue(s) promptly and in a fair manner. If the matter is not resolved informally, then WEL's formal grievance procedure may be invoked.

Accordingly, any employee can seek support from the Grievance Committee for her/his grievance by writing an email to the chairperson of the committee. In the email, the person has to at the least cover the following aspects of her/his complaint;

- Name of the person against whom the complaint is being made
- Narration of Specific Instance/s which triggered the complaint
- Her/his prayer from the committee in terms of outcome

If the employee is not comfortable detailing their grievance in writing, s/he should communicate verbally directly to any member/s of the Committee that s/he wishes to raise a formal grievance. The contact details and names of the Committee members are given at the end of this document.

9. Stage One Procedures:

9a. Validation of the complaint-

The chairperson will validate the complaint with reference to the scope of the policy, in case the chairperson in consultation with the committee members finds out that the complaint is beyond the scope and jurisdiction of the committee, the chairperson will guide the complainant accordingly and help her/his escalate at the right forum such as ICC or any other forum which gets announced in future.

Chairperson and Committee members will also evaluate the grievance if it is found baseless, the Committee will counsel the complainant politely and close the matter.

9b. Post Validation- Step 1- Mediation or Conciliation

Within 7 days of receiving the complaint, the chairperson will give a choice of the Mediation or Conciliation to the complainant and as per her/his choice, the chairperson will appoint one of the team members as a Mediator or a conciliator.

The mediator and conciliator will have to close the matter and file the resolution signed by both complainant and respondent within 15 days of the case allocation to them.

It may be necessary to conduct several sessions, however, this will depend on the grievance raised and the individuals concerned.

It is possible that the mediation / conciliation fail. If the complainant is not satisfied with the results, s/he has a choice to request the chairperson for committee hearing.

Step 2-: Grievance Hearing:

The Committee will invite the complainant to attend a formal hearing to discuss her/ his grievance at the earliest but no later than 5 (five) working days of closure of mediation or conciliation process.

9c. Hearing Guidelines

- a) Meet the complainant, and understand her/his grievance and also include people, if any, who can be the witnesses. Depending upon the nature of the grievance the statements during the hearing will be formally recorded and signed by the complainant.
- b) Meet the respondent/s and understand what s/he/they have to say about the complainant's accusations. The same should also be recorded and signed.
- c) The committee can choose to do a joint session with all the parties in the first instance or after carrying out separate meetings.
- d) The Committee may meet witnesses (if any) or review documentary evidence, as needed for the purpose of corroboration of the statements heard.
- e) Based upon the above proceedings/depositions the Committee shall prepare its report along with the recommendations for resolution.
- f) Such recommendations will be shared with both parties.
- g) The objective is to arrive at a clear resolution agreed to by both parties. Such a resolution should be documented and signed by both parties.
- h) The process should be completed within one month of receiving the complaint. However, this time frame can be extended to two months by the Committee with intimation to the complainant.

10. Stage Two Procedures

10a. Appeal (If stage one decision is not satisfactory):

Stage two committee will consist of the CHRO and MD

If the employee remains aggrieved post the decision of the Committee they can refer the matter in writing to the CHRO within 7 calendar days of receiving their grievance outcome. The appeal must detail the reasons for the complainant to disagree with the outcome.

Once the appeal has been received, the CHRO and MD will arrange to meet with the complainant to discuss the grounds for his/her appeal, normally within 10 (ten) calendar days. A decision will then be given in writing, if possible within the next 10 (ten) calendar days.

On hearing the grievance, the CHRO and MD may need to discuss the matter with the Committee and/or APEX to formulate a response. In such a case the complainant will be kept informed of any reasonably extended timescales that are mutually agreed upon.

This decision will be final within the scope of the organization.

11. Grievance against APEX, Committee Members, Employee of Group outside WEL/MEPL and MD-WEL/MEPL

11a. APEX:

The Stage 1 Complaint will be addressed to the MD. He may discreetly deal with the complaint with or without the help of the CHRO and Committee depending on the sensitivity of the Complaint and may choose to take support from the Group resources.

11b. Committee Members:

Stage 1 Grievance Committee would be constituted of CHRO and other members of the committee who are senior in designation to the member against whom the complaint has been received. The appeal of the aggrieved would be heard by the MD.

11c. Employee of Group outside WEL/MEPL:

To follow the normal process and if the respondent is senior than the committee members, the complaint will be dealt with by CHRO and MD

11d. MD- WEL/MEPL:

The complaint will be dealt with by Group CHRO and Group MD

12. Records:

Records will be kept at each stage of the procedure and checked for accuracy by all parties as appropriate. The complainant and respondent will be provided with copies of any formal meeting records. These will be kept confidential by the committee as well as the complainant and respondent.

13. Committee Member and Contact Details:

Complaints against employees up to SGM & Non-Integrity Related matters		Complaints against SGM+, Integrity Related
GC- Site	GC- Head Office or Any Regional Office	GC- HO
Lead Compliance	Lead Compliance	CHRO/VP - TM
Project Manager	Head Talent Management	
Lead MASR	Lead MASR	CFO
		COO
Finance Controller of Respective Vertical	Chairperson of ICC	Head Contracts / Head SCM