

GRIEVANCE REDRESSAL COMMITTEE (GRC) POLICY

Policy Name: Grievance Redressal Committee (GRC) Policy

Policy No.: HR/GRC/001

Version: 1.0

Effective Date: 20/08/2026

Review Date: 20/08/2026

Policy Owner: Human Resources Department

Approved By: Managing Director

1. PURPOSE

The purpose of this Policy is to establish a structured, transparent and accessible mechanism for receiving, examining and resolving individual employee/worker grievances within the organization.

The Company is committed to providing employees/workers with a fair opportunity to raise genuine employment-related concerns without fear of retaliation and to ensure that grievances are handled objectively, confidentially and within the applicable statutory timelines.

This Policy is framed with reference to the applicable provisions of the **Industrial Relations Code, 2020**, including the provisions relating to the constitution and functioning of the Grievance Redressal Committee (GRC).

2. OBJECTIVES

The objectives of the GRC Policy are to:

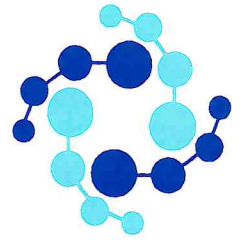
1. Provide employees/workers with an accessible mechanism for raising individual grievances.
2. Ensure grievances are addressed fairly, objectively and consistently.
3. Provide the opportunity to the concerned parties to present their facts and supporting documents.
4. Resolve individual grievances within the applicable statutory timeline.
5. Maintain confidentiality of grievance proceedings.
6. Prevent unnecessary escalation of individual workplace issues.
7. Identify recurring or systemic workplace issues and recommend corrective actions.
8. Maintain appropriate documentation and records of grievances and their resolution.
9. Promote a positive, respectful and harmonious working environment.

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3. SCOPE

This Policy shall apply to eligible employees/workers of the Company and its covered establishments, subject to the applicability of the Industrial Relations Code, 2020 and applicable rules.

The Policy shall cover individual employment-related grievances falling within the jurisdiction of the GRC.

The Policy does not restrict any employee/worker from exercising any statutory right or approaching any authority/forum available under applicable law.

4. APPLICABILITY OF GRC

In accordance with the applicable provisions of the Industrial Relations Code, 2020, an industrial establishment employing **20 or more workers** shall constitute one or more Grievance Redressal Committees in accordance with the prescribed requirements.

The Company shall review the applicability of the GRC requirement from time to time based on the applicable establishment structure, worker strength and statutory provisions.

5. CONSTITUTION OF THE GRC

The GRC shall be constituted in accordance with the applicable statutory requirements.

The Committee shall:

- Have equal representation from the Employer and Workers.
- Not exceeding the maximum number of members prescribed under applicable law.
- Include appropriate representation of women workers in accordance with the applicable statutory requirement.
- Have a chairperson who rotates alternately between Employer and Worker representatives.
- Have a chairperson rotation period of one year, subject to applicable law.

Recommended Company Structure

For internal administration, the Company may constitute a six-member GRC:

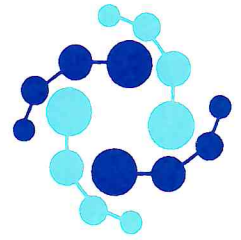
Category	Number
Employer Representatives	4
Worker Representatives	3
Total	7

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The final composition shall be determined based on the applicable workforce composition and statutory requirements.

6. GRC MEMBERS

The names and details of GRC members shall be notified separately through an official Company communication.

GRC Constitution

SL. NO.	NAME	DESIGNATION/REPRESENTATION	CATEGORY	ROLE
1	MAHENDRA BINDAL	MANAGING DIRECTOR	EMPLOYER	CHAIRMAN
2	RAHUL UPADHYAY	ASSISTANT GENERAL MANAGER - HR	EMPLOYER	MEMBER
3	SUMAN SIL	SENIOR MANAGER - HUMAN RESOURCE	EMPLOYER	MEMBER
4	APARUPA DAS	COMPANY SECRETARY	EMPLOYER	MEMBER
5	BODHISATTWA BHADRA	GENERAL MANAGER - MANAGED SERVICES	WORKER	MEMBER
6	SUDIPTA DUTTA	MS ACCOUNT MANAGER	WORKER	MEMBER
7	SAMIR TIWARI	ASSISTANT GENERAL MANAGER	WORKER	MEMBER

The Committee shall be reconstructed whenever required due to changes in workforce representation, member eligibility, separation from employment, expiry of tenure or any other reason requiring reconstitution.

7. TENURE OF GRC MEMBERS

The tenure of the GRC shall be governed by the applicable statutory requirements.

The Company shall ordinarily review/reconstitute the Committee annually to ensure continued compliance with the prescribed composition and Chairperson rotation requirements.

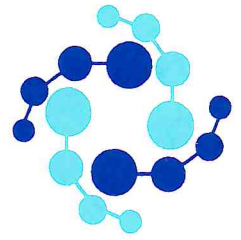
Where any member ceases to be eligible to serve on the Committee, the Company may nominate an appropriate replacement.

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8. CHAIRPERSON

The Chairperson shall rotate alternately between Employer and Worker representatives every year in accordance with the applicable statutory requirement.

The Chairperson shall:

1. Preside over GRC meetings.
2. Ensure that both parties receive a fair opportunity to present their case.
3. Maintain neutrality during proceedings.
4. Facilitate timely completion of proceedings.
5. Ensure that decisions are properly documented.
6. Coordinate with the GRC Secretariat/HR for implementation of decisions.

9. ROLE OF GRC MEMBERS

GRC members shall:

- Act impartially and objectively.
- Maintain confidentiality.
- Review relevant documents and information.
- Participate in hearings and discussions.
- Avoid conflict of interest.
- Provide reasonable opportunity to concerned parties to present their views.
- Participate in decision-making.
- Ensure that grievances are dealt with within the applicable timeline.
- Maintain professional conduct throughout the proceedings.

10. GRC SECRETARIAT

The HR Department shall act as the GRC Secretariat unless otherwise notified by the Company.

The GRC Secretariat shall be responsible for:

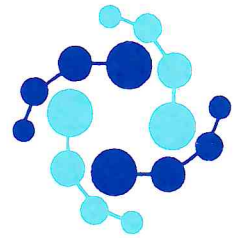
1. Receiving grievances.
2. Assigning grievance reference numbers.
3. Maintaining the GRC Register.
4. Coordinating meetings.
5. Issuing meeting notices.

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6. Maintaining minutes and records.
7. Coordinating document collection.
8. Communicating decisions.
9. Tracking corrective actions.
10. Monitoring statutory timelines.
11. Maintaining appropriate records for audit/compliance purposes.

11. ACKNOWLEDGEMENT

The GRC Secretariat shall acknowledge receipt of the grievance and provide the grievance reference number to the concerned employee wherever practicable.

The acknowledgement may also communicate:

- Date of receipt;
- Reference number;
- Contact point;
- Expected next step;
- Requirement for additional documents, if any.

12. PRELIMINARY REVIEW

Upon receipt, the GRC Secretariat/authorized HR representative shall conduct a preliminary review to determine:

1. Whether the matter is an individual grievance.
2. Whether it falls within the scope of the GRC.
3. Whether sufficient information has been provided.
4. Whether supporting documents are required.
5. Whether the matter falls under another statutory mechanism.

The preliminary review shall not prejudice the merits of the grievance.

13. INVESTIGATION / FACT-FINDING

The GRC may review relevant records and obtain necessary information, including:

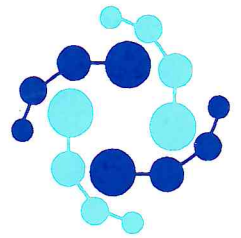
- Attendance records
- Payroll records
- Leave records
- Employment documents
- Company policies

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- Written communications
- Relevant management records
- Employee submissions
- Other relevant documents

The Committee may seek written or verbal clarification from the concerned persons.

14. HEARING

The concerned employee/worker shall be provided a reasonable opportunity to present the grievance. The

GRC may invite:

- Aggrieved employee/worker
- Reporting Manager
- HR Representative
- Operations Representative
- Finance Representative
- Other relevant persons

The Committee shall ensure that the proceedings remain professional and focused on the grievance.

15. CONFIDENTIALITY

All grievance-related information shall be treated as confidential to the extent reasonably practicable.

Information shall be disclosed only to individuals who have a legitimate requirement to know the information for investigation, decision-making, implementation or statutory compliance. GRC members shall not disclose confidential information outside the authorized process.

16. CONFLICT OF INTEREST

A GRC member shall disclose any actual or potential conflict of interest.

Where a member is directly involved in the grievance or has a personal interest in the outcome, the Company may require the member to recuse themselves from that particular matter and may nominate an alternate eligible representative where appropriate.

17. DECISION-MAKING

The GRC shall consider:

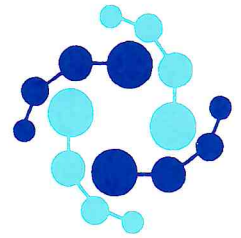
- Facts presented by the concerned parties;
- Supporting documents;



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- Relevant Company policies;
- Employment records;
- Applicable law;
- Statements and clarifications obtained during proceedings.

The decision shall comply with the statutory decision-making requirements under the Industrial Relations Code, 2020.

The Committee shall document the basis of its decision.

18. RESOLUTION TIMELINE

The GRC shall endeavour to complete the proceedings and resolve the grievance within the statutory period of **30 days from the date of receipt of the grievance/application**, subject to applicable law.

The GRC Secretariat shall monitor all open cases to ensure that grievances do not remain pending beyond the prescribed timeline without appropriate justification.

19. GRC DECISION

The decision may result in:

- Grievance accepted;
- Grievance partially accepted;
- Grievance not substantiated;
- Grievance rejected;
- Corrective action recommended;
- Administrative correction required;
- Matter referred to another appropriate mechanism;
- Further investigation required.

The decision shall be recorded appropriately.

20. COMMUNICATION OF DECISION

The outcome shall be communicated to the concerned employee/worker in writing.

The communication should contain, where appropriate:

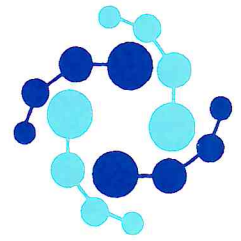
1. Grievance reference number.
2. Brief description of the grievance.
3. Findings.
4. Decision.

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5. Corrective action, if any.
6. Responsible department.
7. Expected completion timeline.
8. Further statutory remedy, where applicable.

21. FURTHER REMEDY / ESCALATION

Where the grievance is not resolved within the prescribed period or the worker is aggrieved by the decision of the GRC, the worker may exercise the further remedy available under applicable law, including approaching the appropriate Conciliation Officer within the prescribed statutory period, where applicable.

Nothing in this Policy shall prevent a worker from exercising any statutory right available under applicable law.

22. NON-RETALIATION

The Company prohibits retaliation against any employee/worker for raising a genuine grievance in good faith through the appropriate mechanism.

Any allegation of retaliation may be separately reviewed by HR/Management in accordance with applicable Company policy and law.

This protection shall not prevent the Company from taking action in cases involving knowingly false, malicious or deliberately misleading submissions, subject to applicable law and due process.

23. CORRECTIVE ACTION

Where the GRC identifies a valid grievance requiring corrective action, the concerned department shall implement the approved corrective action within the agreed timeline.

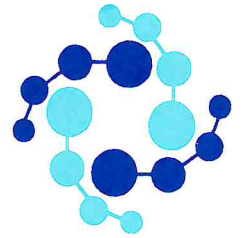
HR shall monitor the action until closure.

Examples may include:

- Payroll correction;
- Attendance correction;
- Leave correction;
- Documentation correction;
- Administrative correction;
- Clarification of policy/process;
- Other appropriate employment-related corrective action.

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24. CLOSURE OF GRIEVANCE

A grievance shall be marked as **Closed** after:

1. The GRC decision has been communicated;
2. Required corrective action has been completed, where applicable;
3. Relevant documentation has been recorded; and
4. The case has been reviewed by the GRC Secretariat.

Closure shall not prevent the employee from exercising any statutory remedy available under applicable law.

25. RECORD RETENTION

The Company shall maintain GRC records in a secure manner for the period prescribed under applicable law and Company record-retention requirements.

Access to records shall be restricted to authorized personnel.

Electronic records should be stored in an appropriately secured system where available.

26. DATA PRIVACY AND INFORMATION SECURITY

Personal information obtained during grievance proceedings shall be handled in accordance with applicable privacy, data protection and information-security requirements.

Only information necessary for handling the grievance should be collected and retained.

27. MANAGEMENT RESPONSIBILITY

Management shall:

- Support the functioning of the GRC.
- Provide necessary records/information.
- Ensure reasonable cooperation from departments.
- Facilitate implementation of approved corrective actions.
- Avoid interference with the independent consideration of grievances.

28. EMPLOYEE RESPONSIBILITY

Employees/workers are expected to:

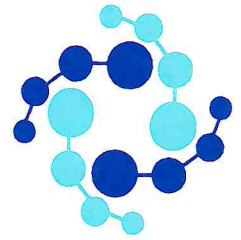
- Raise grievances in good faith.
- Provide accurate information.

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- Submit relevant supporting documents.
- Cooperate with the grievance process.
- Attend hearings when requested.
- Maintain confidentiality where required.
- Avoid knowingly false or malicious complaints.

29. HR RESPONSIBILITY

HR shall:

1. Ensure constitution/reconstitution of the GRC.
2. Maintain the GRC member list.
3. Monitor statutory compliance.
4. Maintain grievance records.
5. Coordinate hearings.
6. Monitor the 30-day resolution timeline.
7. Track corrective actions.
8. Maintain confidentiality.
9. Conduct periodic GRC reviews.
10. Escalate systemic issues to Management.

30. GRC PERFORMANCE REVIEW

HR may periodically prepare a GRC dashboard containing:

Metric	Measurement
Total grievances received	Number
Grievances closed	Number
Pending grievances	Number
Average closure	Days
Cases escalated	Number
Recurring grievance categories	Category
Ageing cases	Number

The dashboard may be reviewed by senior management periodically.

31. POLICY REVIEW

This Policy shall be reviewed periodically or whenever there is:

- A change in applicable labour legislation;
- Change in statutory rules;
- Change in Company structure;
- Change in grievance process;
- Audit/compliance observation;
- Any other requirement necessitating policy revision.

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[Signature]
Director

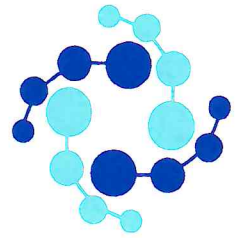


Where there is any inconsistency between this Policy and applicable law, the applicable law shall prevail.

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ANNEXURE I – GRC GRIEVANCE FORM

Employee Name: _____

Employee ID: _____

Department/Project: _____

Designation: _____

Contact Number: _____

Email ID: _____

Date of Incident: _____

Date of Grievance Submission: _____

Nature of Grievance

Detailed Description

Supporting Documents (Yes/No)

1. _____
2. _____
3. _____

Employee Signature: _____

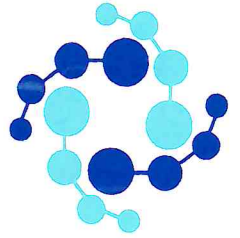
Date: _____

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ANNEXURE IV – GRC CASE CLOSURE FORM

GRC Reference No.: _____

Employee ID: _____

Date Received: _____

Date of Decision: _____

Outcome: _____

Corrective Action Required: Yes / No

Corrective Action Completed On: _____

Closure Remarks:

Closed By: _____

Designation: _____

Date: _____

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