

INDO COUNT INDUSTRIES LIMITED

EMPLOYEE GRIEVANCE REDRESSAL POLICY

Version No.: 1.0

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Approved by: Board of Directors

A. OBJECTIVE

Indo Count Industries Limited ('ICIL' or 'the Company') is committed to providing a productive and conducive work environment where grievances are dealt with fairly and promptly. The objective of the Employee Grievance Redressal Policy ('Policy') is to facilitate a work culture where grievances are minimized and thus help in improving performance and productivity of all employees / workers of the Company.

B. DEFINITIONS

1. "Chairman" means the "Executive Chairman of the Company".
2. "Grievance" means a concern, problem or complaint which may be related to work, working environment, reporting relationships, etc.
3. "Grievance Redressal Committee" means the authority empowered to make decisions under this Policy.
4. "Head of Department" means HOD whose responsibility is to manage and run the respective Department.

C. SCOPE AND APPLICABILITY

This policy shall cover all regular employees/workers of ICIL, except officers who are one level below the Board of Directors and officers reporting directly to Chairman of the Company.

D. POLICY GUIDELINES

Grievances pertaining to or arising from the following shall come under the purview of this policy:

1. Workplace harassment
2. Nonsexual harassment
3. Health and safety issues
4. Supervisor behavioural issues

This list is not exhaustive. However, employees should try to resolve less important issues informally before they resort to a formal grievance.

E. EXCLUSIONS

Grievances pertaining to or arising from the following shall not come under the purview of this policy:

1. Matters related to collective disputes/bargaining such as salary, allowances, hours of work and other benefits, and cases related to disciplinary procedures.
2. Annual performance appraisal/salary increments
3. Matters that do not relate to an individual employee/worker.
4. The removal or dismissal of an employee/worker
5. Matters pertaining to the period before the date of joining ICIL and or initial appointment/absorption in ICIL.
6. Matters relating to terms and conditions of appointment settled prior to joining or appointment/absorption in ICIL.
7. Non-exercise of a discretion vested with the Competent Authority in favour of the aggrieved employee/worker.
8. Matters pertaining to or arising out of disciplinary action or appeal against such action – these shall be channelled to the Competent Authority as laid down under the Industrial Disputes Act or other relevant Act.
9. Any other as may be decided with the approval of the Chairman – any addition to this list will be communicated through appropriate means to all relevant stakeholders.

F. GRIEVANCE REDRESSAL COMMITTEE

Committees for grievance redressal will be created at each location the Company operates in, as per the composition given below:

- Committee for Workers – One at Each Factory
 - Factory Head
 - Factory IR Head
 - At least two HODs who have completed 3 years in ICIL
 - One Female Staff who has completed 3 years in ICIL
- Committee for Staff – Centralized Committee
 - Corporate HR Head
 - At least 1 Division Head
 - At least 2 senior HODs who have completed 3 years in ICIL
 - One Female Staff who has completed 3 years in ICIL

- The Committee configuration will be changed once in three years to ensure that there is no bias or vested interests in resolving grievances

In case the Complaint pertains to any Head/HOD/Staff Member who is the member of the above-mentioned Committee, such Head/HOD/Staff Member shall abstain from attending the grievance meeting in which the matter is discussed.

G. GRIEVANCE REDRESSAL PROCESS

WORKERS:

Level 1:

Workers should submit their grievance in writing to the union representative. The said representative will submit the same to their HOD. The HOD should acknowledge the receipt of the grievance, if possible immediately, in writing. The HOD should attempt to redress the grievance within a period of 2 (two) working days. The resolution should be provided in writing to the aggrieved person.

Level 2:

If the concerned worker is not satisfied with the above response from the HOD, the union representative can submit the grievance along with the response received to the Grievance Redressal Committee at his/her location. The relevant Committee will meet within 3 (three) days of receipt of grievance to assess the grievance. Based on a careful analysis of the grievance in light of the facts of the matter, the Grievance Redressal Committee would make its recommendation within a period of 7 (seven) working days and send it to the aggrieved worker.

Level 3:

If the Committee's recommendation is not acceptable to the aggrieved worker, the issue may then be escalated to the Chairman, whose decision will be binding and close the issue.

STAFF:

Level 1:

The affected employee should submit the grievance (in writing) stating his/her name, designation, employee number and grievance to his/her reporting manager or Head of the Department (HOD) or alternatively the affected employee can submit the grievance by sending an email to grievance@indocount.com stating the aforesaid details. The reporting manager/HOD should acknowledge the receipt of the grievance, if possible immediately, in writing. If the complaint is raised through email, it should be acknowledged, and passed on to the reporting manager/HOD for resolution. The reporting manager/HOD should attempt to redress the grievance within a period of two working days. The resolution should be provided in writing to the aggrieved person.

Level 2:

If the concerned employee is not satisfied with the above response from his/her immediate reporting manager/HOD, he/she can submit the grievance along with the response received to the Grievance redressal Committee. The Committee will meet within 3 days of receipt of any grievance to assess the grievance. Based on a careful analysis of the grievance in light of the facts of the matter, the Committee will make its recommendation within a period of seven working days and send it to the aggrieved staff member.

Level 3:

If the Committee's recommendation is not acceptable to the aggrieved staff member, the issue may then be escalated to the Chairman, whose decision will be binding and close the issue.

H. REPORTING

The Grievance Redressal Committees will report to the Chairman of the Company. A quarterly written report of grievances handled will be submitted to the Chairman.

I. GUIDELINES AND CONDITIONS

1. The employee / worker shall submit his/her grievance within one month from the date of occurrence. However, any anonymous / pseudonymous email/ letter received by the Company relating to any grievances shall not be entertained.
2. If the grievance arises out of an order issued by the management, the said order must first be complied with, and thereafter the concerned employee / worker should submit his/her grievance as per the procedure laid down in this policy document.

J. REVIEW AND IMPLEMENTATION OF THE POLICY

The Corporate HR Head shall be responsible for the effective implementation of this Policy. Periodical information about the grievances received, resolved and pending be placed before the NRC for its noting.

Notwithstanding anything contained above, the Chairman may modify, alter, delete or add any clause or sub-clause to this Policy as and when considered necessary for the efficient conduct of the Company's business. Such changes will be communicated to all relevant stakeholders through appropriate means. The Chairman shall be the final authority in the interpretation of this Policy and in cases not covered by this Policy, his decision shall be final.