GRIEVANCE POLICY

GRP LIMITED

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Signed and Approved by	Board of Directors
Frequency of Review	Annually or as and when required

1. Purpose, Objectives, & Applicability:

GRP Limited (GRP) strives to be a responsible value creator for all our stakeholders. This necessitates our ability to handle any grievance or concern which may come from our stakeholders. This document aims to provide an avenue for all stakeholders such as employees, contract workforce, local communities, suppliers, customers, or any other supply chain stakeholders to raise a grievance/ concern pertaining to the perceived or real instances of wrong or unfair treatment. To make the redressal mechanism more meaningful and effective, this document also provides for the mechanism of recording and reporting of grievance redressal across levels.

This policy is applicable to all business units, locations and subsidiaries of GRP Limited, currently existing or coming up in future.

2. Scope:

Following categories of grievances shall be covered under these procedures:

a) Customers

- Product related grievances
- Payment related grievances
- Data privacy related grievances
- Content related grievances

b) Supply Chain (Manufacturers, Suppliers/ Vendors etc.)

- Raw material/product related issues
- Transportation related issues
- Payment and contract terms
- Documentation related issues

c) People Grievances (Employees, Workers, Consultants, Workforce service providers, Contract workers, etc.)

- Unethical behaviour by GRP's personnel
- Unfair wage practices
- Unsafe working conditions
- Conditions perceived as forced labour, modern slavery, threat to wellbeing, harassment (except matters explicitly covered under PoSH procedures) etc.
- Other issues commonly understood as people issue

d) Community Grievances

- Unethical behaviour by GRP's personnel
- Risk to community health and safety
- Accidents (road and traffic safety)
- Environmental and social impacts related to GRP's operations
- Other miscellaneous issues

e) Other Stakeholders

- Grievance related to company operations and information disclosure

The above list is non-exhaustive and is only an illustrative list of grounds under which a complaint and request for an investigation can be made. Accepting the grievance and taking it for redressal through the most appropriate route shall be discretion of the Grievance Committee.

3. Procedure:

Grievance/ concerns can be submitted through multiple channels:

a) Grievance Form
All Plants and Head Office (HO) shall maintain Grievance Forms at the Gate/ Reception area. Format of the Grievance Forms are prescribed in Table 1.

b) By Post
Grievances by post must be sent to the Grievance Committee to the GRP HO, Mumbai.

c) Online/ Email
Grievances can be sent through email to grievance.redressal@grpweb.com . An appropriate link shall be created on the Company website www.grpweb.com

All grievances will be reviewed by the Grievance Committee of GRP, who will ensure that such grievances are dealt promptly, fairly and in accordance with other related policies of the organization.

The Grievance Committee will constitute the following:

Chair	:	Chief Financial Officer
Member 1	:	President – Operations
Member 2	:	President – Sales & Business Development
Member 3	:	Compliance Officer
Management Representative	:	Chief Human Resources Officer
Appellate	:	Chief Compliance Officer/Audit Committee

Step 1: Grievance submission

The grievant shall submit the grievance to GRP through one of the modes mentioned above. If the grievant is unable to access the Grievance Form, the following details are expected to be furnished:

- **Grievant details** including first name, last name, email address, organization/ company name, type of grievant (customer, supplier, vendor, shareholder, investor, employee, community etc.) and location/ physical address of the grievant.
- **Anonymous grievances**, where the grievant chooses to remain anonymous, can still be accepted; however, follow-up or requests for additional information may not be possible.
- **Grievance details,** including the party against whom the grievance is being submitted, the country of issue, the reason for the grievance, any previous attempts to resolve it, and the preferred remedy.

Step 2: Assessment

Within 3 working days of receipt of the grievance through any of the modes, the Grievance Committee will assess if the grievance falls under the predefined scope and decide whether the grievance is acceptable. The grievant may be contacted for more details to be able to assess the acceptability of the grievance. If the grievant does not provide the requested information within 14 working days, the grievance will not be accepted, and the case will be closed.

If the grievance is accepted, the grievant will receive a formal acknowledgement and details of the next steps in the procedure. If the grievance is not accepted, GRP will inform the grievant of the reasons why the submitted grievance does not fall within the Grievance Mechanism's scope.

Anonymous grievances shall be dealt as mentioned in Step 1 above.

Step 3: Investigation

Within 21 working days of the date the grievance is accepted, GRP will proceed to investigate the circumstances of the case, speak with the parties involved, and confer with relevant stakeholders. The grievant may be contacted to contribute additional information.

The Grievance Committee shall create an appropriate Investigation Team to investigate the grievance and share their findings. Principles of Natural Justice, Ethics, Fairness and Confidentiality must be maintained during the investigation process.

Step 4: Decision

Within 10 working days of the date the investigation has been concluded, the Grievance Committee will outline investigation findings, define remedial actions, and communicate them to the grievant. The decision should be reasonable, proportional to the grievance and consider cultural norms. It will become final by the 7th working day after its communication to the grievant unless the deadline is interrupted by an appeal.

Step 5: Appeal

The grievant, if not satisfied with the decision of the Grievance Committee has a right to Appeal within 5 working days of the date or receipt of the decision, following the steps and mode of grievance submission. On receipt of the appeal, the Appellate authority shall review the considerations of the Grievance Committee's decisions and materiality of the appeal. The Appellate shall have 10 days from the date of receipt of the appeal to confirm if the decision of the Grievance Committee requires to be upheld or revised in the light of the appeal. The Grievance Committee shall communicate the outcome of the appeal/ final decision to the grievant within 5 working days of receipt of the Appellate' s decision.

No further appeal on the final decision is possible.

4. Recording and Reporting:

All grievances shall be recorded in the format indicated in Table 2 on offline or online mode to keep track of grievances and commitments. This will reduce the risk of leaving any issues open and identifying opportunities for improvement and bettering relationships. Online grievance database

shall be maintained by the Management Representative and presented to the Top Management Committee (TMC) every month.

5. Confidentiality & Non-Disclosure:

The Grievance Committee shall ensure the identity and details of a complainant, and other persons involved in and/or assisting in an investigation will be kept confidential to the extent permitted by law and Company policy. No unfair treatment will be met up with the grievant and the Company shall not resort to any kind of discrimination, harassment, victimization, or any other unfair treatment being adopted against the grievant.

6. Annexures

Table 1: Grievance Form

Name, postal address, email id and contact number of the person reporting the grievance *If choosing to stay anonymous, further communication on the redressal process may not be possible.*	
Relationship of the grievant to GRP (Tick appropriately)	**Customer/ Vendor or Supplier/ Employee/ Contractor/ Contract Worker/ Consultant/ Shareholder/ Investor/ Business Partner/ Community/ Others** **Please specify if chosen Others:**
Details of grievance/ concern	
Declaration: I confirm that the above report is based on my own experiences, and I have not been influenced by anyone to write this report. The Grievance Redressal process has been explained to me, and I shall abide by the process. I shall co-operate with the Company for any additional information or support that might be required for the process. I also confirm to accept the decision of the Company on the redressal process. Date: Place: Signature	
FOR OFFICIAL USE ONLY **Received On (Date)_____Place_____ By (Name s** **Signature) _____**	

Table 2 Grievance Register/ Database

Date	Serial	Grievant Name	Brief of Grievance	Assessment Status	Outcome	Date of Closure	Remarks