GRIEVANCE REDRESSAL POLICY

REVISION HISTORY:

Sr No	Rev no	Rev Date	Revision Details	Prepared by	Approved by
1	00	01.01.2020	Initial release	Manali M	Shailesh D
2	01	01.01.2023	Overall Change in Polices	Manali M	Shailesh D
3	02	01.11.2026	Overall Change in Polices, alignment with RPSG Group Policy	Vikrant K	Shailesh D

PREAMBLE

Aquapharm Chemical Limited ("Aquapharm" or "the Company") is committed to maintaining a fair, respectful, inclusive, and transparent workplace where employees are treated with dignity and respect. The Company recognizes that concerns, complaints, and grievances may arise during the course of employment and believes that prompt, fair, and impartial resolution of such grievances contributes to a positive work environment, employee engagement, trust, and organizational effectiveness. This Policy establishes a structured mechanism for employees to raise workplace grievances and seek resolution in a timely, confidential, and equitable manner.

OBJECTIVE

The objectives of this Policy are to:

(a) Provide employees with a formal mechanism to raise and resolve workplace grievances.
(b) Ensure grievances are addressed fairly, promptly, consistently, and objectively.
(c) Promote harmonious employee relations and a positive work culture.
(d) Encourage open communication and early resolution of workplace concerns.
(e) Protect employees from retaliation for raising genuine grievances in good faith.
(f) Ensure compliance with applicable labour laws, human rights principles, and the Company's Code of Conduct.

SCOPE

This Policy applies to all employees of Aquapharm Chemical Limited, including permanent employees, probationers, trainees, apprentices, fixed-term employees, contract employees (where applicable), as well as retainers and consultants working under the supervision or control of the Company. All covered individuals are encouraged to raise workplace grievances promptly to facilitate timely resolution. As a general principle, grievances should be reported as soon as practicable and preferably within thirty (30) days from the occurrence of the incident, event, or circumstance giving rise to the grievance.

The Company encourages agency workers, temporary workers, interns, service providers and other individuals working at Company premises to raise workplace concerns through appropriate reporting channels where applicable Through this Policy, Aquapharm supports the principles of United Nations Guiding Principles (UNGP) by providing a fair, transparent, and effective grievance resolution mechanism.

DEFINITION OF GRIEVANCE

A **Grievance** is any concern, dissatisfaction, complaint, dispute, unfair treatment, or sense of injustice experienced by an employee in relation to employment, workplace conditions, management actions, or interactions with colleagues. Examples include, but are not limited to:

a) **Work-Related Grievances**
Work-related grievances may include concerns regarding job assignments and responsibilities, working conditions, health and safety, workplace environment, working hours and shift arrangements, workload distribution, harassment, bullying, disrespectful conduct, interpersonal conflicts, discrimination, unequal treatment, career development opportunities, and access to training and learning initiatives

b) **Compensation and Benefits-Related Grievances**
Compensation and benefits-related grievances may include issues concerning salary and wages, overtime payments, incentive payments, reimbursement of approved business expenses, leave entitlements, employee welfare facilities, transportation services, uniforms, personal protective equipment (PPE), safety gear, and other employment benefits provided by the Company.

c) **Employment Practice-Related Grievances**
Employment practice-related grievances may include concerns regarding the interpretation or application of HR policies, transfer-related matters, working arrangements, administrative decisions affecting employment, and other workplace practices that may impact an employee's terms and conditions of employment. Any other concern affecting an individual employee's work environment, treatment, or employment relationship with the Company may also be considered a grievance under this Policy, provided it falls within the scope of this Policy.

MATTERS OUTSIDE THE SCOPE OF THIS POLICY

The following matters shall not be addressed under this Policy:

a) Matters covered under the Prevention of Sexual Harassment (POSH) Policy.
b) Allegations of fraud, corruption, bribery, unethical conduct, or misconduct covered under the Whistleblower Policy.
c) Disciplinary proceedings and disciplinary actions.
d) Performance ratings, appraisal outcomes, promotion decisions, or talent review outcomes unless there is evidence of procedural unfairness, discrimination, or policy violation.
e) Matters pending before courts, tribunals, or statutory authorities.
f) Collective disputes raised by trade unions or employee groups that are governed under separate industrial relations mechanisms.

GUIDING PRINCIPLES

The grievance redressal process at Aquapharm Chemical Limited shall be administered in accordance with the principles of fairness, impartiality, transparency, confidentiality, and natural justice. All grievances shall be reviewed objectively and without bias, ensuring that employees are provided a reasonable opportunity to present their concerns and supporting information. The Company is committed to resolving grievances promptly and consistently while treating all parties with dignity, respect, and professionalism. Information relating to grievances shall be handled on a need-to-know basis to protect confidentiality and privacy. Employees who raise grievances in good faith shall be protected from any form of retaliation, victimization, or adverse treatment. The Policy shall be applied uniformly across the organization to ensure equitable treatment and maintain employee trust in the grievance redressal mechanism

NON-RETALIATION

No employee shall be subjected to retaliation, discrimination, victimization, intimidation, adverse employment action, or harassment for:

- Raising a grievance in good faith;
- Participating in an investigation;
- Providing information or evidence in support of a grievance.

Any retaliation shall be treated as misconduct and may invite disciplinary action.

GRIEVANCE REDRESSAL COMMITTEE (GRC)

The Company shall constitute a Grievance Redressal Committee at every Location of Aquapharm with equal representation of Management & worker's:

Responsibilities of the GRC

The Committee shall:

- Review grievances escalated beyond departmental levels.
- Conduct fair and objective investigations.
- Ensure adherence to principles of natural justice.
- Meet employees and relevant stakeholders as required.
- Recommend appropriate corrective and preventive actions.
- Maintain records and confidentiality.
- Monitor closure of grievances.

GRIEVANCE REDRESSAL PROCEDURE

Stage 1: Informal Resolution

The employee should initially discuss the matter verbally with the Immediate Supervisor or Reporting Manager. The Supervisor shall:

- Understand the concern,
- Explore possible solutions,
- Communicate the decision or action taken.

Timeline: Within 15 working days. Where the grievance concerns the Reporting Manager, the employee may directly approach the Department Head or Human Resources Department.

Stage 2: Formal Written Grievance

If the employee is not satisfied with the outcome of Stage 1, or if no response is received within the stipulated timeline, the employee may submit a written grievance to:

- Department Head, and
- Human Resources Department

using the prescribed Grievance Form. The Department Head, in consultation with HR, shall:

- Review the grievance;
- Meet the employee if necessary;
- Conduct fact-finding;
- Communicate a written response.

Timeline: Within 15 working days of receipt.

Stage 3: Grievance Redressal Committee Review

If the employee remains dissatisfied, the grievance may be escalated to the Grievance Redressal Committee. The Committee shall:

- Conduct an independent review;
- Meet the concerned employee;
- Hear all relevant parties;
- Examine evidence and documents;
- Recommend appropriate resolution.

The employee may be accompanied by another employee as a support person during discussions. **Timeline: Decision within 30 working days of escalation.** The Committee's recommendation shall be communicated in writing.

Stage 4: Final Appeal

If the employee remains dissatisfied after the GRC review, a final written appeal may be submitted to the CEO. The CEO or an authorized nominee shall:

- Review all relevant records;
- Meet concerned parties if required;
- Seek clarification from the GRC;
- Issue a final decision.

Timeline: Within 30 working days of receipt of appeal. The decision of the CEO shall be final and binding.

Important Points to Consider

- An employee who is dissatisfied with the outcome at any stage may escalate the grievance within seven (7) working days from receipt of the decision.
- Human Resources shall acknowledge receipt of a written grievance within two (2) working days and communicate the next steps in the review process.

CONFIDENTIAL GRIEVANCE REPORTING

Employees who are uncomfortable reporting through regular reporting channels may directly contact Human Resources or any designated Grievance Contact Officer. The Company shall maintain confidentiality to the extent practicable and legally permissible. The identities of employees reporting grievances in good faith shall be protected.

RECORD KEEPING

Human Resources shall maintain records of:

- Grievance submissions
- Investigation notes
- Supporting evidence
- Meeting records
- Decisions and recommendations
- Closure reports

All records shall be maintained as per the **Document Retention Policy** or longer where required by law.

REPORTING AND MONITORING

The HR Department shall:

- Maintain a grievance register;
- Track grievance resolution timelines;
- Prepare quarterly grievance reports;
- Present periodic summaries to the CEO and Leadership Team.

The quarterly report may include:

- Number of grievances received
- Number resolved
- Pending grievances
- Resolution timelines
- Root-cause trends
- Corrective and preventive actions taken

RESPONSIBILITIES

a) Employees

- Raise grievances promptly.
- Provide accurate information.
- Cooperate during investigations.

b) Supervisors and Managers

- Encourage open communication.
- Address concerns fairly and promptly.
- Escalate unresolved grievances as required.

c) Human Resources

- Act as the nodal function.
- Facilitate grievance resolution.
- Ensure policy compliance.
- Maintain records and reporting.

d) Grievance Redressal Committee

- Conduct impartial reviews.
- Recommend appropriate actions.
- Ensure timely closure.

POLICY GOVERNANCE

This Policy shall be administered by the Human Resources Department and may be amended, modified, or withdrawn by the Company from time to time in accordance with business requirements, legal requirements, and governance standards.

PERFORMANCE COMMITMENTS AND COMPLIANCE OBJECTIVES

To demonstrate continual improvement and accountability, Aquapharm shall endeavour to:

- Resolve at least 90% of grievances within prescribed timelines.

- Acknowledge 100% of grievances within 2 working days.
- Close 100% substantiated grievances with documented corrective actions.
- 100% Grievance Redressal training completion for identified employees and relevant third parties.

This Policy shall be reviewed at least annually by the Head- Human Resources & Administration or earlier if required due to legal, business or regulatory changes.

CUSTODIAN:

Head- Human Resources & Administration

Shailesh Deshmukh
Head- Human Resources & Administration | **Aquapharm Chemical Limited**