

**Godfrey Phillips India Limited**

**Grievance Redressal Policy**

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## **1. Introduction**

Godfrey Phillips India Limited (hereinafter referred to as “GPIL” or “the Company”) believes that satisfaction and engagement of employees and all other stakeholders are of extreme priority and focus.

Pursuant to this, the Company has formulated this **Grievance Redressal Policy** (hereinafter referred to as “Policy”) which communicates Company’s commitment to handle Grievances with transparency, establish a secure and equitable work environment, nurture strong relationships with both internal and external stakeholders.

In addition, an outlined Grievance Redressal process is provided, allowing both internal and external stakeholders to express their concerns within a framework that ensures transparency and fairness.

This Policy should be read in conjunction with other related policy documents such as the Code of Business Conduct Policy. Any additional related policies formulated by the Company will automatically become conjunct to this Policy.

## **2. Purpose**

The primary purpose of this Policy is to provide a mechanism for employees to raise Grievances and seek redressal arising from their employment and create a beneficial and comfortable work environment for everyone.

The Purpose of this Grievance Redressal Policy is to:

- a) Disseminate all avenues available for registering a Grievance.
- b) Outline the procedures and timelines for filing and resolving a Grievance.
- c) Specify the steps for disciplinary action in case of Policy breaches and
- d) Emphasize the Company’s commitment to maintaining a respectful and harmonious workplace.

The Company encourages an open environment where employees are motivated to voice their concerns in accordance with the Policy.

## **3. Scope**

This Policy extends its applicability to all personnel associated with the Company and its subsidiaries, including but not limited to employees, directors, interns, and apprentices. It is designed to ensure that everyone within the organization’s purview adheres to the principles and guidelines outlined herein.

Furthermore, the Policy also encourages external stakeholders - encompassing business associates, retainers, consultants, customers, and suppliers of the Company - to abide by the principles set forth in this Policy in all their interactions and transactions with the Company and its subsidiaries.

#### 4. Definitions

<b>Term</b>	<b>Definition</b>
<b>Grievance</b>	Any issue, concern, problem, or claim that an individual or group wishes to have formally addressed by the Company.
<b>Grievance Redressal Process</b>	A system established by the Company to receive, evaluate, and address grievance / grievances pertaining to undesired actions and / or behaviours of employees of the Company or the Company.
<b>Internal Stakeholders</b>	Groups or individuals who are part of the Company operations directly. This encompasses roles such as Directors, senior executives, employees, staff, interns & apprentices, and third-party employees.
<b>External Stakeholders</b>	Groups or individuals who interact with the Company such as suppliers, shareholders, etc. It also includes groups and individuals who, while not directly employed or contracted by the Company, are nonetheless affected by the decisions made by the Company.
<b>Complainant</b>	Complainant shall mean internal and/or external stakeholder who is aggrieved.

<b>Grievance Redressal</b>	Grievance Redressal will be addressed by Company Authorised Representatives, and/or members of the Ethics Committee based on the category of Grievance raised. Redressal shall mean the processes of noting, understanding, and resolving Grievance and making recommendations for the necessary corrective action by the Company's Authorised Representatives and/or by the members of Ethics Committee.
<b>Respondent</b>	Respondent shall mean anyone against whom a Grievance has been reported under this Policy. Respondent shall have the right to receive a copy of the allegations levelled against them.
Authorized Company Representatives	Authorized Company Representatives are individuals designated by the Company to act on its behalf in specific matters.

**5. Grievance Reporting Channels**

- 5.1. The Company is committed to sharing this Policy with all its internal and external stakeholders. The aim is to foster awareness and provide a clear understanding of how stakeholders can articulate their Grievances. This approach ensures transparency and encourages open communication.
- 5.2. Before initiating an official Grievance complaint, the Complainant is expected to go through the Grievance Redressal Policy in detail. This step is essential as it helps in understanding the context and the potential implications of their Grievance.
- 5.3. In addition to this, the Company also emphasizes the following points:
  - a) Timely Communication: Company encourages stakeholders to voice their Grievances as soon as they arise (or within a span of 30 days).

- b) Confidentiality: Company assures that all Grievances will be handled with utmost confidentiality to protect the interests of the stakeholders.
  - c) Non-Retaliation: Company adheres to a strict non-retaliation approach. Any stakeholder voicing their Grievances will not face any adverse consequences.
  - d) Resolution Process: Company is committed to resolving all Grievances in a fair and timely manner as per the process elucidated in this Policy.
  - e) Follow-up: After a Grievance has been addressed, Company will conduct follow-ups to ensure the resolution has been effective and satisfactory.
- 5.4. This comprehensive approach ensures that all stakeholders have a clear, fair, and transparent platform to voice their Grievances. It reflects Company's commitment to maintaining a harmonious and respectful environment for all.
- 5.5. Apart from this Grievance Redressal process, as defined in this Policy, some other policies (as mentioned below) are also available for specific Grievances:

<b>Grievance Category</b>	<b>Primary Policy Reference</b>
Sexual Harassment	Prevention of Sexual Harassment Policy
Corruption and Bribery	Anti-Bribery Anti-Corruption Policy, Supplier's Code of Conduct
Whistleblowing on unlawful acts, severe irregularities, Policy violations etc.	Whistleblower Policy, Code of Business Conduct, UPSI Policy
Violation of Human Rights	Human Rights Policy, Equal Opportunity Policy
Environment Related	ESG Policy, EHS Policy, Biodiversity Policy

- 5.6. To file a Grievance under the above-mentioned categories (behaviour and/or actions) or for any other purpose related to business, both internal and external stakeholders should contact the email addresses mentioned below:

<b>Contact Information for Various Complaints and Grievances</b>	
<b>For serious irregularities and complaints under Whistleblower Policy &amp; Code of Business Conduct</b>	<p>Addressed to: - Chief Executive Officer (CEO)</p> <p><a href="mailto:ceo@godfreyphillips.co.in">ceo@godfreyphillips.co.in</a></p> <p>Note: Any Grievance under Whistleblower Policy must follow the process stated within the Whistleblower Policy.</p>
<b>For Corruption &amp; Bribery, violation under Supplier Code of Conduct, Human Rights, and Environment related issues, and complaints under UPSI Policy</b>	<p>Addressed to: - Ethics Committee</p> <p><a href="mailto:ethicscom@godfreyphillips.co.in">ethicscom@godfreyphillips.co.in</a></p>
<b>For POSH related complaints contact:</b>	<p>Addressed to: - Chief Human Resource Officer (CHRO)</p> <p><a href="mailto:sakshia@godfreyphillips.co.in">sakshia@godfreyphillips.co.in</a></p> <p>Or</p> <p>any Internal Complaint Committee as per POSH policy available on Company's website <a href="http://godfreyphillips.co.in">godfreyphillips.co.in</a></p>
<b>For Shareholder related complaints contact</b>	<p>Addressed to: - Company Secretary, Godfrey Phillips India</p> <p><a href="mailto:isc@godfreyphillips.co.in">isc@godfreyphillips.co.in</a></p> <p><a href="mailto:rnt.helpdesk@linkintime.co.in">rnt.helpdesk@linkintime.co.in</a></p>
<b>For Customer complaints contact:</b>	<p>Addressed to: - CG Cell, Godfrey Phillips India Limited</p> <p><a href="mailto:cgcell@godfreyphillips.co.in">cgcell@godfreyphillips.co.in</a></p> <p><a href="mailto:Cgcell-gpi@modi-ent.com">Cgcell-gpi@modi-ent.com</a></p>

## 6. Grievance Redressal Mechanism Process

**Step I.** The Company promotes a culture where employees are urged to communicate with each other to address minor issues, concerns, and Grievance.

**Step II.** In case the Grievance remains unresolved, then as a first resolution step, the Complainant can seek a resolution from their immediate manager and/or Unit Human Resource department.

**Step III.** If a resolution is not provided satisfactorily by the immediate manager/Unit Human Resource department within seven (7) working days, the Complainant can seek help in facilitating communication or finding a solution with a representative from Corporate Office Human Resource (HR) department.

**Step IV.** If resolution is still not satisfactory, then these concerns can be escalated to the Head of the Function. It is the responsibility of the Head of the Function to address all concerns/Grievance promptly and impartially, in consultation with Chief Human Resource Officer (CHRO).

**Step V.** Final escalation for grievances, issues and concerns will be the office of Chief Executive Officer (CEO). Chief Executive Officer will bear the responsibility of impartially addressing the grievance and will do so in consultation with the office of Chairperson & Managing Director (CMD).

Note:

- If the Grievance relates to the Head of the Function, then the employee may seek direct intervention of the Chief Executive Officer (CEO).
- External Stakeholders can communicate with relevant domain senior managers or Head of the respective departments to resolve their Grievances.
- During the initial, informal stage, all parties involved, including the employee who raised the concern, should strive to settle the matter without resorting to the formal procedures. This Informal resolution could include mediation, a coordinated meeting, or a change in procedure/process to avoid similar issues in future.
- If the informal complaint is not addressed in a fair and constructive manner within fifteen (15) working days from the date of reaching the Head of Function, Complainant may approach relevant stakeholders as mentioned in clause 5.6 above or the CEO.

An Authorized Company Representative will be the recipient of all Grievances submitted via email or written complaints. Such Representative will evaluate the Grievance and manage it in accordance with

the prescribed procedure. This ensures that every concern is given due attention and resolved in a systematic and fair manner.

The Authorised Company Representative and/or members of Ethics Committee, who will address Grievances is committed to upholding the principles of natural justice when investigating a Grievance. The following outlines the procedure that will be followed during such an investigation. While this procedure will be applied to all Grievances, the Committee reserves the right to deviate from this process in individual cases if it believes that doing so is necessary to uncover the truth.

## **7. Reporting and Redressal Procedure**

### **Stage 1: Reporting of Grievance**

- 8.1. All formal Grievance should be registered in writing with respective Authorised Company Representative and/or members of Ethics Committee within a maximum period of sixty (60) days from the occurrence of issue or incident. The mention of Grievance/complain should include:
  - a) A detailed description of the Grievance, including a timeline of dates and events or incidents, employees involved etc. if applicable.
  - b) Information about any attempts made to address the issue informally if such attempts were made. This ensures that all relevant information is considered when addressing the Grievance. Complainants are encouraged to record all previous discussions/meetings with details and outcomes for reference.
  - c) Grievance submitted anonymously will not be considered.
- 8.2. The Complainant who has filed a Grievance may be allowed to present their case in person and may be allowed to be assisted by a co-worker of their choice.
- 8.3. All formal Grievances will be officially recorded and preserved in correspondence.
- 8.4. The Authorised Company Representative and/or members of Ethics Committee shall, before taking up a Grievance for enquiry, communicate about the same to the Complainant and Respondent both.
- 8.5. The Authorised Company Representative and/or members of Ethics Committee shall provide every reasonable opportunity to the Complainant and Respondent, for putting forward and defending their respective cases.

### **Stage 2: Initial Assessment**

- 8.6. The Authorised Company Representative and/or members of Ethics Committee will assess the Grievance to determine its validity. If valid, the Authorised Company representatives and/or

members of Ethics Committee will initiate the resolution process, else will communicate with acknowledgement and alternative steps.

**When a Grievance is filed against another employee, the Respondent also reserves the right to:**

- a) View and request a copy of the official Grievance.
- b) Formally respond to the Grievance after consulting their manager and the HR department.
- c) Attend formal meetings wherever applicable.

**Stage 3: Investigation and Resolution**

- 8.7. The Authorised Company Representative and/or members of Ethics Committee, in collaboration with concerned managers and HODs, is responsible for investigating Grievance.
- 8.8. The investigation may involve site visits, consultations with employees, and communication with external stakeholders.
- 8.9. The meetings, discussions and activities all need to be formally recorded during the investigation.
- 8.10. Information gathered during the investigation will be analyzed and will assist in determining how the Grievance is handled and what steps need to be taken to resolve the Grievance.
- 8.11. The Company prescribes a time-limit of sixty (60) working days for redressal of Grievance. In case of delay, an interim reply with reasons for delay will be provided. to all parties concerned.
- 8.12. Brief periods of absence of Complainant or Respondent due to sickness/ill health may delay the Grievance process but if there are repeated or long absences then alternative arrangements will be made which may include continuing with investigation and resolution in the person's absence.

**Stage 4: Action on Recommendations**

- 8.13. Following the investigation, the Authorised Company Representative and/or member of Ethics Committee will use the recommendations to create an action plan outlining steps to be taken to resolve the Grievance. The Authorised Company Representative and/or members of Ethics Committee will assign a Company representative who will be responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the team feels the Grievance has been resolved, they will then formally advise the designated committee or officer.
- 8.14. All records, including Grievance forms, investigation notes, interviews and minutes of meetings will be securely filed.

**Stage 5: Follow up and Closure**

8.15. Upon the fulfilment of the investigation, three weeks after the Grievance is resolved, the assigned Company's representative will contact the relevant internal and external stakeholder/s to follow up on implementation of recommendations/action plan. When contacting the internal/external stakeholder, the Company representative will verify that the outcome was satisfactory and gather feedback on the Grievance process.

8.16. The Company will not accept and/or tolerate abusive or insulting behavior from anyone taking part in or conducting Grievance procedures. Any such behavior will be treated as misconduct by the Company.

## **8. Confidentiality**

GPIL stakeholders, internal and external along with involved employees, including senior management, HR representatives and members of committees dealing with Grievances are committed to maintain Confidentiality that limits them from discussing the Grievance before and after it has been resolved. All parties are prohibited from discussing the matter with any other GPIL employees or externally.

## **9. Policy Violations**

If a Respondent is found to have violated a Company policy in reference to the Grievance lodged, they will be subject to disciplinary action. The designated committees or officer is empowered to take appropriate disciplinary actions, as deemed fit by them. The severity of each case will determine the type of disciplinary action, which may include a verbal or written warning, suspension, and/or termination.

Complainants should be aware that if a Grievance is found to be vexatious or raised with the intention of disrupting the disciplinary/capability process, disciplinary action will be considered for the complainant too.

## **10. Ethics Committee**

The Ethics Committee will oversee and ensure a robust Grievance Redressal process for the Company. The number of Grievances settled or pending under all policies will be recorded and reported by the Committee.

The Ethics Committee will meet quarterly or before if required to address Grievance, specific concerns or plan upcoming activities.

**The Ethics Committee will include the following members:**

- Chief Executive Officer                      Mr. Sharad Aggarwal
- Chief Human Resource Officer              Ms. Sakshi Anand
- Senior Vice President, Finance              Mr. Vishal Dhariwal,
- Vice President, Legal                          Mr. Rajesh Nair,
- Head of Function (from the function the Grievance has come in or any other Head of Function if the Function Head, or HOD is the respondent).

**11. Review**

The Policy shall be reviewed by the Ethics Committee or Chief Human Resource Officer as and when it deems necessary or in compliance with any laws, rules and regulations enacted.

**12. Version Control**

<b>Version</b>	<b>Change Description</b>	<b>Date</b>
1.0	New policy drafted	08/11/2024