

<i>Guideline / Policy</i>	<b>Title</b>	Grievance Handling Policy
	<b>Version</b>	V4
	<b>Issue Date</b>	23/04/2019
	<b>Revision Date</b>	26/07/2024

<b>Document History</b>
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Version	Date of Amendment	Author	Brief Description of Change	Reviewed By
1	23/04/2019	SHR	To promote fair and equitable work environment for the members and provide fair resolution towards the grievance.	Managing Director
2	01/04/2021	SHR	Sameep AI Chatbot Grievance Portal included	Managing Director
3.	26/02/2024	SHR	Annual Revision and Addition of Employer and Members Rights & Duties	Process Owners & Knowledge Partners
4	26/07/2024	SHR	Review of Policy	Process Owner

**I. Introduction**

Trident is committed to provide a productive and conducive work environment. The grievance procedure at Trident Ltd. is fair and is demonstrated properly to the members so that effective decisions can be taken without affecting time and the output of the member as well as the organization. A strong Grievance handling system has been set up which serves as an outlet to redress member grievances. The existence of an effective grievance procedure reduces the possibility of members approaching judicial authority. This Policy has been set up in accordance with the Principles of the International Labour Organisation (ILO) and the Industrial Disputes Act (1947). Proactive action helps in solving the issues/problems for the maximum satisfaction of the member to increase his/her efficiency and morale.

In every instance throughout this policy, the terms "This Company," "The Company," "Company," and "Trident" signify "Trident Limited".

Member shall include any person on payroll of Trident Limited, including those working within the premises of the Company whether directly or indirectly (through contractor or outsourcing agencies)

This policy as amended from time to time shall be made available at the website of the Company.

## II. Scope

This Policy applies to all individuals working at all levels and cadres (whether permanent, fixed term, or temporary), directors, retainers, consultants, contractors, trainees, casual workers, or associated with us or any of our subsidiaries/associates in any other capacity.

## III. Key Definitions

- **‘Grievance’:** Constitutes all problems and concerns related to the work environment, co-workers, and job benefits. Grievances related to fraud, suspected fraud, malpractices, sexual harassment in our operations will be covered under the Code of Conduct, Whistle Blower and Prevention of Sexual Harassment policies and hence excluded from the purview of this policy.
- **‘Confidentiality’:** All complainants’ personal information needs to be protected and only those who need to be informed will be provided with the details. Members should be aware that if they make a complaint against another member, the accused will, in most cases, need to be informed about the same.
- **No Retaliation:** No retaliatory action will be taken against the member who has lodged any type of grievance even at a later stage. False/fraudulent complaints are however discouraged and will attract disciplinary action.

## IV. Abbreviations

<b>HOD</b>	Head of Department
<b>ILO</b>	International Labour Organisation
<b>IR</b>	Industrial Relations
<b>SHR</b>	Strategic Human Resource

## V. Policy

This policy is to lay down procedure/mechanism for redressal of grievances by setting up an internal grievance committee to address complaints and grievances. The primary purpose of this grievance redressal policy is to give members the right to voice their complaints. This policy, further, aims at minimizing instances of complaints and grievances and ensuring prompt redressal at various levels.

Grievance pertaining to; or arising out of the following shall not come under the purview of this Policy:

- Annual performance appraisals/Confidential Reports; adverse remarks be communicated.
- Where the grievance does not relate to an individual associate, admin, work condition grievances.
- Grievances pertaining to sexual harassment at workplace to be covered under the Organization’s POSH Policy
- Grievance arising out of illegal/ wrong - termination/dismissal, demotion, suspension, other disciplinary actions, or appeal against such actions.

### Hierarchy of a complaint:

Following is the escalation procedure which is followed at Trident Group. In case of conflict-of-interest, a member may use the following approach to raise a concern:

- **Supervisor/HOD:** In the first step, aggrieved members will take the grievance to their supervisor. Some of the minor grievances are solved at this stage only. In case supervisor/HOD is unavailable/unable to take decision/ solve problem within two days, the member approaches the Business IR.
- **Business IR:** In case supervisor and HOD fail to address the problem, the grievance is submitted to the Business IR. In case Business IR is unavailable/unable to take decision/ solve problem within one day, the member approaches the Chief of IR.
- **Chief of IR:** Chief of IR will try to provide the solution depending upon the severity of the grievance within two days of time frame.

In case Chief of IR unavailable/unable to take decision/ solve problem within two days, the member may approach any of the other platforms such as Grievance Committee/ PanchSabha / KAAAN committee to have in person discussions but before that member shall be advised to raise the ticket in SAMEEP - AI Chatbot to have a record of same. Post punching the request, members may physically visit any of the committee as per the scheduled time published on Unit Notice Boards.

- **Grievance Committee** If the Chief of IR representative fails to provide a solution, the aggrieved member can take his grievance-to-grievance committee who will try to provide the solution.
- **Panchsabha -**, Any aggrieved person having any grievance of abusive/ unparliamentary language, rude behavior from his senior and his colleagues, grievance regarding discrimination, issue of salaries, victimization, complaint regarding non-adherence of values of company, integrity, regarding consuming of any prohibited substance, regarding any disciplinary issue/security issue and issues regarding any practical/ social/ economic issues may approach Panchsabha for redressal of their grievance. Panchsabha will immediately act and will take all necessary steps by calling all the parties to the matter in issue and will get the matter resolved within 3 days.
- **24\*7 Helpline Service KAAAN:** A 24\*7 Helpline Service known as “KAAAN” is also available where an aggrieved member can contact this helpline in case of any unresolved grievances. The member can contact on following numbers-
  - 9878999200
  - 9878999300
  - Ext. 3300

This cell directly shares the grievance issues with Chairman office of the organization. Also, weekly scheduled KAAAN meetings are arranged at all locations. Members may discuss their Grievances in person if not resolved by their respective Supervisors/ HODs/ HR team.

Members can also raise their concerns anonymously through Sameep AI chatbot, where it shall be routed to concerned stakeholder hiding the details of member who has raised the concern.

As mentioned earlier, members shall be encouraged to raise a ticket of their grievance before coming to Grievance Committee/ PanchSabha & KAAAN Committee meeting to have a record of it. In case a member has not followed the approach, then the concerned coordinators are requested to keep a record of all the grievances in Sameep which have come up in these meetings.

**Other Channels for filing a complaint: Visual Communication Boards:** These will have the details of the concerned personnel, with their numbers displayed in every area.

- **Suggestion Box:** In case anybody wants to lodge any anonymous grievance, they may do so by dropping the same in suggestion box which shall be the responsibility of Social Welfare team to open during the PanchSabha meeting scheduled every week.
- **Sameep AI Chatbot:** In case anybody wants to lodge any anonymous grievance/ Suggestions/Opinions/ Improvement ideas etc., they can do the same by raising the ticket in Sameep App. Complaint shall be

assigned to the concerned Stakeholders. If not resolved, the same will be escalated to the manager and later with HOD of concerned stakeholder.

**Process of Resolution:**

The HR representative will do personal discussion with concerned authorities and will make a summary report of the incidence and will present the same to HR head of business. The HR head will nominate the person who will conduct detailed investigation (as per procedure for investigation and discouragement) and will submit the report to CEO and CEO will take necessary action as company norms. Details regarding procedure to be followed complaint is filed are outlined in Trident's Standard Operating Procedure titled "Procedure for Prohibition of harassment or abuse", "Procedure for Grievance Handling" and this policy must be read in conjunction with the same.

The aggrieved person will register their grievance to the first three channels (Supervisor/ HOD) and thereafter, if grievance is not resolved then to other channels as mentioned above.

**Grievance Committee**

A Grievance Redressal Committee has been constituted at Trident Limited as required under the Industrial Disputes Act, 1947.

- An equal number of members from both management and workers are there in the committee.
- Hold quarterly meetings where members of the committee encourage the members to report the grievances, if any. Procedures to deal with the grievance have been displayed at conspicuous places.
- Names of committee members to be displayed.
- All the reported grievances / issues need to be resolved within seven days of reporting the grievance to the committee.
- Grievance Committee to regularly consult with internal stakeholders to improve existing grievance mechanisms.
- Regular reports to be submitted to the Board of Directors that list the number of grievances and their nature and the actions taken against ensuring that the grievances are redressed.

**Internal Complaints Committee**

- Internal Complaint Committee has been instituted which handles the cases related to Sexual harassment, if any.
- ICC has monthly meetings where members of the committee encourage the female members to report the grievances, if any and sensitize the members on sexual harassment prevention. Procedures to deal with such cases has been displayed at conspicuous places. Names of committee members also displayed.

**Panchsabha**

- The Panchsabha will consist of 5 persons.
- The 5 persons will be of high repute & wisdom, dedicated to their cause and having sympathetic attitude towards all.
- The tenure of Panchsabha would be for 6 months only.
- All the reported grievances / issues to be resolved within three days of reporting the grievance to the committee.
- Panchsabha will maintain complete record of the complaints received and steps taken for the redressal of the grievance.

Panchsabha will submit its reports regularly to MD.

## Grievance Committee Constitution

- **Purpose:**

The purpose of the Trident Limited Grievance Committee is to address and resolve workplace grievances within Trident Limited in a manner that promotes fairness, transparency, and a positive work environment.

- **Composition:**

- Membership:

The Grievance Committee shall consist of 6 members of which 3 are female members representing diverse departments and levels within Trident Limited. Members will be appointed by [relevant authority] in consultation with department heads.

- Chairperson:

The committee shall elect a Chairperson from among its members. The Chairperson's role is to preside over meetings, coordinate committee activities, and act as a liaison with Trident Limited's leadership.

- Member Representatives:

The Grievance Committee will include member representatives from diverse organizational levels and departments. These representatives act as advocates, ensuring a broad perspective in grievance resolution.

- External Expertise:

The Committee may enlist external experts for specialized insights into employment laws and conflict resolution. External members ensure an unbiased and credible grievance resolution process.

- **Formation Guidelines:**

- Appointing Members:

Members of the Grievance Committee will be appointed by the top management or HR department, ensuring that individuals with the requisite skills and objectivity are selected. The appointment process should be transparent, and members should be willing to commit to the responsibilities of the committee.

- Training and Orientation:

Once appointed, committee members will undergo training on the company's policies, relevant employment laws, and grievance resolution procedures. This ensures that the committee operates with a clear understanding of its role and responsibilities.

- Term Limits:

To maintain a fresh perspective and prevent potential conflicts of interest, term limits will be implemented for committee members. This practice ensures a regular infusion of new perspectives and prevents the committee from becoming stagnant or biased over time.

- Confidentiality and Impartiality:

Committee members must adhere to strict confidentiality guidelines to protect the privacy of

those involved in the grievance process. Additionally, members should commit to remaining impartial and free from any undue influence during the resolution proceedings.

- **Accessibility:**  
The Grievance Committee should be easily accessible to members, and there should be a clear procedure for submitting grievances.

- **Responsibilities**

- **Receiving Grievances:**  
The committee is responsible for receiving written grievances from Trident Limited members, ensuring confidentiality, and maintaining a detailed record of all submitted grievances.
- **Investigation:**  
Upon receiving a grievance, the committee shall conduct a thorough and impartial investigation, including gathering relevant information and interviewing involved parties.
- **Recommendations:**  
Based on the investigation, the committee shall provide recommendations to Trident Limited's leadership for the resolution of the grievance, ensuring fair and just outcomes.
- **Communication:**  
The committee shall communicate its findings and recommendations to the relevant parties involved, maintaining transparency and clarity in the resolution process.

- **Confidentiality Clause:**

All proceedings and discussions within the Trident Limited Grievance Committee shall be treated with the utmost confidentiality to protect the privacy of involved parties.

- **Amendments:**

This constitution may be amended by a [percentage] vote of the Trident Limited Grievance Committee members, subject to approval by [relevant authority].

- **Ratification:**

This constitution shall be ratified by Trident Limited's [relevant authority or board] and become effective upon approval.

## **VI. Procedure**

The grievance procedure consists of the following sequential steps:

### **Local Resolution:**

- Attempt to resolve the matter directly with the individual involved.
- If a resolution cannot be reached, the member should seek to resolve it with their supervisor/ HOD or escalate to the next level of management.

**Informal Resolution:**

- Discuss the concern with the supervisor, or if necessary, with the Head of Department (HOD).
- Following the discussion, it will be determined whether an informal resolution is possible or if the matter should progress to a formal grievance.
- In the case of informal resolution, the Supervisor/ HOD takes responsibility for follow-up.

**Formal Complaint:**

- When attempts at informal resolution prove ineffective or are deemed inappropriate for the situation, the complaint advances to the Formal Grievance process. At this stage, the member is required to present a written summary of the grievance, providing comprehensive details about its nature. The submission should be made to the Head of Department (HOD). To ensure an impartial process, the HOD engages an HR representative to provide independent advice and guidance throughout the proceedings.
- The HOD may request additional details or clarification from the member regarding the basis of the grievance before proceeding further. In cases where the member fails to provide the necessary information as requested, the HOD may determine that there is insufficient data to proceed with the formal process.
- Once sufficient detail is available, the HOD conducts a formal interview with the members to gain a comprehensive understanding of all aspects related to the grievance.
- Subsequently, the HOD conducts separate formal interviews with the other party or parties involved in the grievance to gather all relevant facts related to the case. All parties to the grievance have the right to bring a Companion to these interviews upon making a reasonable request, and an HR representative will also be present. It is essential to understand that the investigation initiated by the Company does not imply agreement with the occurrence of the grievance, except in cases involving very serious allegations, which may require an investigation without the member's consent and possible referral to an appropriate external body.
- Following the formal interviews, the HOD compiles all relevant data and, if necessary, gathers further evidence to support the investigation. In appropriate cases, and with the consent of all major parties involved, a joint meeting may be organized to discuss the issue and explore potential resolutions. The HOD provides a confidential summary of the grievance to all parties involved. A copy of this summary should be signed by all parties and securely held by the HOD until the investigation concludes.
- At any time, members can choose to escalate the matter to the Business IR as per the defined hierarchy in case HOD is unavailable/ unable to resolve the problem based on the severity of the case.
- In case Business IR is unavailable/unable to take decision/ solve problem within one day, the member approaches the Chief of IR.
- The Chief of IR will try to provide the solution depending upon the severity of the grievance and in case Chief of IR unavailable/unable to take decision/ solve problem within two days, the member may approach other platforms such as Grievance Committee/ PanchSabha/ KAAN Committee meeting.

### **Deliberation:**

- After completing all necessary investigations, the Head of Department (HOD) will promptly notify all parties involved of the decision reached. This decision will be communicated in writing, confirming and advising on the outcome. The written notice will also include information about the parties' right to appeal against the decision if they are dissatisfied and will identify the designated recipient for appeals, usually the Chief People Officer (Chief of IR).
- In addition to the decision, the letter will outline any recommended actions that may arise because of the grievance process. If the grievance is found to be substantiated, immediate measures will be taken to prevent a recurrence of such an event.
- The concerned Supervisor, in collaboration with the HR representative, will assess the appropriate follow-up actions based on the decision. If necessary, formal disciplinary procedures will be invoked to address the matter appropriately and in accordance with company policies and guidelines.

### **Appeal:**

- If either party expresses dissatisfaction with the outcome of Stage One in the grievance process, they have the right to appeal by submitting a written appeal within five working days of receiving the decision notice from Stage One. The appeal should be addressed to the Chief of IR Chief of IR and must include a comprehensive explanation of the grounds for the appeal, along with any additional relevant information to be considered. At this stage, the HOD will hand over the entire grievance file to the Chief of IR for further review.
- If the appeal is deemed suitable for consideration, it will proceed to a formal hearing. The appeal hearing will be scheduled as expeditiously as possible, and the grounds for the appeal, including any supplementary information, will be shared with the concerned parties involved in the grievance.
- During the appeal hearing, the immediate parties to the grievance will attend, and they will be given the opportunity to present and elucidate their respective cases directly to the Chief of IR Chief of IR. A detailed summary of the appeal hearing will be prepared and shared with the attendees, who will be requested to verify its accuracy.
- The final decision resulting from the appeal hearing will be communicated in writing to the members within 15 working days from the date of the hearing.

It is essential to note that the Appeal stage constitutes the concluding phase of the internal grievance procedure, and any decision made at this juncture shall be considered binding within the organization. However, should any of the parties remain dissatisfied with the decision at the Appeal stage, they retain the option to escalate their complaint to the appropriate external body or authority for further consideration and resolution.

## **VII. Training**

Training and awareness of the contents of this policy to be conducted regularly. All new hires to be made aware of the provisions of the Policy, and existing members to be made aware of any updates to the Policy.



Details of training programs are outlined in Trident’s independent document titled “Capacity and capability building Policy” and this policy must be read in conjunction with the same.

**VIII. Exception**

Any exception to the above policy shall be approved by the Chairman Office, Business Head, CHRO, Compliance Officer and Legal Head.

**IX. Review Timeline**

The policy may be reviewed in the month of January every year or as and when the company may deem fit.

**X. Governance**

**Responsibility Matrix**

1	Implementation/Execution	HRBP & IR Team
2	Monitoring	Corporate ESG & Corporate HR
3	Auditing	Legal Head, IR Head & Risk Management
4	Ownership	Compliance Team & HR Team

**Employer Rights:**

- The employer reserves the right to establish and maintain a fair and efficient grievance handling system to address member concerns promptly and effectively, ensuring a conducive work environment.
- The employer can, at its discretion, amend and update the grievance handling policy from time to time to align with evolving principles and legal requirements, and such revisions will be communicated to all members through the company’s official website.
- The employer reserves the right to define the scope of grievances covered under this policy, explicitly excluding matters related to annual performance appraisals, work conditions, and sexual harassment, which are addressed separately in accordance with the organization's policies.
- The employer can enforce a zero-tolerance approach towards retaliation, ensuring that no adverse actions are taken against a member who has filed a grievance, apart from disciplinary measures against false or fraudulent complaints.
- The employer reserves the right to constitute a Grievance Committee, comprising equal representation from both management and workers, to serve as the primary mechanism for addressing grievances, ensuring quarterly meetings, and displaying committee members' names for transparency.
- The employer reserves the right to conduct a fair and impartial investigation during the formal complaint stage, involving relevant parties, gathering evidence, and ensuring a transparent process that respects the principles of natural justice and can take necessary action based on the severity of the case leading up to termination. In case any such incident has been reported, the same should appear in the record and

shall be published physically & digitally.

#### **Employer Duties:**

- The employer is obligated to provide a conducive and productive work environment, ensuring the well-being and job satisfaction of all members.
- The employer is duty-bound to adhere to the principles of the International Labour Organisation (ILO) and the Industrial Disputes Act (1947) in framing and implementing its Grievance Handling Policy.
- The employer has a responsibility to establish and maintain a fair and transparent Grievance Handling System, serving as an outlet for redressing member grievances promptly and effectively. The Grievance Committee, constituted as per legal requirements, must act as an unbiased platform for conflict resolution.
- The employer is duty-bound to protect the confidentiality of complainants and ensure that personal information is disclosed only to those individuals who require such information for proper grievance resolution. The company should maintain a delicate balance between confidentiality and the need for a thorough investigation.
- The employer has the duty to prevent any form of retaliation against members who lodge grievances. The company must actively discourage and take disciplinary action against any form of retaliatory behaviour, ensuring a culture where members feel secure in reporting their concerns.
- The employer has a duty to define and communicate a clear hierarchy of complaint resolution, specifying the steps and personnel responsible for addressing grievances at different levels. This ensures a structured and efficient grievance redressal process within the organization.
- The employer is responsible for regularly training and creating awareness among all members about the Grievance Handling Policy. The company must conduct orientation sessions for new hires and provide updates to existing members to keep them informed about the policy's provisions.
- The employer is obligated to ensure that all reported grievances are resolved within the stipulated time frame, as outlined in the Grievance Handling Policy. The Grievance Committee should actively engage with external and internal stakeholders to continuously improve the grievance resolution mechanisms.
- The employer is duty-bound to conduct thorough investigations at various stages of the grievance resolution process, ensuring that the process is fair, impartial, and follows the principles of natural justice. The company must provide a comprehensive and unbiased review of all relevant facts.

#### **Member Rights:**

- Every member at Trident Limited has the right to a productive and conducive work environment, where their well-being and job satisfaction are prioritized. Members are entitled to fair and transparent treatment in all employment matters, including grievance resolution, in accordance with the principles of the International Labour Organisation (ILO) and the Industrial Disputes Act (1947).
- Members have the right to access and utilize the Grievance Handling System established by Trident Limited. This system serves as a platform for redressing grievances promptly and effectively, providing an unbiased forum for conflict resolution through the Grievance Committee.
- All members have the right to expect confidentiality in the grievance resolution process. Personal information disclosed during a grievance should be protected, with access limited to individuals involved in the resolution, ensuring a balance between confidentiality and a thorough investigation.

- Members are protected from any form of retaliation when they lodge grievances. Trident Limited actively discourages and takes disciplinary action against any retaliatory behaviour, fostering a culture where members feel secure in reporting concerns without fear of reprisal.
- Members have the right to expect timely resolution of their grievances. Trident Limited is duty-bound to ensure that all reported grievances are resolved within the specified time frame, fostering a work environment where concerns are addressed promptly.
- Members are entitled to fair and thorough investigations at various stages of the grievance resolution process. Trident Limited ensures that the process is impartial, respects principles of natural justice, and provides a comprehensive review of all relevant facts.
- Members have the right to a comprehensive follow-up on the decision reached in the grievance process. Trident Limited assesses appropriate actions based on the decision, including disciplinary measures, if necessary, to address substantiated grievances promptly and prevent their recurrence.

#### **Member Duties:**

- Members at Trident Limited are responsible for contributing to a positive and collaborative work environment by treating their colleagues, superiors, and subordinates with respect and professionalism. This includes fostering a culture of teamwork and open communication.
- All members have a duty to abide by the policies and procedures outlined by Trident Limited, including the Grievance Handling Policy. This involves familiarizing themselves with company policies and complying with them in their daily work activities.
- Members are expected to exercise discretion and maintain the confidentiality of information disclosed during the grievance resolution process. It is the duty of members to respect the privacy of their colleagues and the integrity of the investigation.
- Every member has a responsibility to report any observed instances of harassment, discrimination, or unethical behaviour in the workplace. This duty extends to promptly bringing such matters to the attention of supervisors or the appropriate channels, ensuring a safe and inclusive work environment.
- Members have the duty to refrain from engaging in any form of retaliation against colleagues who have lodged grievances. It is imperative for all members to uphold a culture where raising concerns is encouraged and protected from adverse consequences.
- All members are expected to familiarize themselves with the hierarchy of complaint resolution as outlined in the Grievance Handling Policy. It is the duty of members to follow the prescribed steps for grievance resolution, seeking resolution at the appropriate levels.
- Members have a duty to actively participate in training and awareness programs conducted by Trident Limited. This includes attending orientation sessions for new hires and staying informed about updates to policies, ensuring a well-informed and engaged workforce.
- Every member is responsible for raising their concerns and grievances in a timely manner. It is the duty of members to communicate their issues promptly to the relevant channels, contributing to the swift and efficient resolution of workplace concerns.
- Members have a duty to cooperate fully during investigations at various stages of the grievance resolution process. This includes providing accurate information, attending interviews as requested, and respecting the principles of a fair and impartial investigation.

All members are responsible for respecting and adhering to the decisions reached in the grievance.

- process. It is their duty to comply with any recommended actions and follow through on any disciplinary measures prescribed by Trident Limited.

For Trident Limited

Authorized Signatory