



Mankind Pharma Limited

Grievance Redressal Policy

Version No. 01/ _____

CONTENTS

1.	OBJECTIVE.....	3
2.	SCOPE.....	3
3.	DEFINITIONS.....	3
4.	GRIEVANCE.....	4
5.	CONSEQUENCES OF EMPLOYEE GRIEVANCE.....	4
6.	POSITIVE DIMENSIONS OF EMPLOYEE GRIEVANCE.....	4
7.	GUIDING PRINCIPLES.....	5
8.	GRIEVANCE REDRESSAL COMMITTEE.....	5
9.	ROLES AND RESPONSIBILITIES OF GRC.....	5
10.	REPORTING & REDRESSAL PROCEDURE.....	6
11.	DECISIONS.....	8
12.	NON-RETALIATION.....	8
13.	RECORD RETENTION & ACCESS.....	8
14.	CONFIDENTIALITY.....	8
15.	CONTACT.....	9
16.	AMENDMENT IN THE POLICY.....	9

1. OBJECTIVE

- 1.1 This Grievance Redressal Policy (the “**Policy**”) aims to reinforce the Company’s commitment towards providing fair and equitable work environment to its Employees.
- 1.2 The Company has fairly large number of Employees. On a day-to-day basis, the Employees deal and interact with their peers, subordinates and seniors. Sometimes these interactions may lead to a conflict among the Employees. Interactions may also result in an Employee feeling dissatisfied with the way he has been treated/dealt with by a peer, a senior or a junior. An Employee may also become dissatisfied and develop a grievance on account of some management decision taken by another Employee within the organizational hierarchy qua him. These decisions may relate to wages, payment of overtime wages, bonus, sanction of leave, grant of increments, grant of promotion, hours of employment, training, expression of dissatisfaction with performance, settlement of terminal benefits, etc. Needless to add the examples given are only illustrative and not exhaustive.
- 1.3 The objective of this Policy is to lay down the procedure/mechanism for redressal of grievances of the Employees, of the nature described herein-above, and to create a Grievance Redressal Committee to inquire into complaints about all such grievances and make recommendations for the necessary corrective action, if any.
- 1.4 In view of above, below are the objectives of this Policy:
 - 1.4.1 To provide efficient and effective grievance redressal mechanism for all Employees of the Company and lay down the procedure thereof;
 - 1.4.2 To create and promote a culture of fairness, trust and justice within the Company; and
 - 1.4.3 Establish the protocol to enable the Company to resolve Employees grievances effectively, promptly, quickly and in a time bound manner;

2. SCOPE

- 2.1 This Policy is applicable to all Employees of the Company.

3. DEFINITIONS

- 3.1 “**Company**” refers to Mankind Pharma Limited, its subsidiaries, associates and group companies.
- 3.2 “**Complainant**” shall mean any Employee (including legal heirs, assigns or legal representatives) who reports a grievance to the Company.
- 3.3 “**Employees**” include all the employees of the Company, on full-time or part-time employment, with either permanent, probationary, trainee, retainer, temporary or contractual appointment at the Company
- 3.4 “**Respondent**” shall mean any Employee against whom a complaint has been reported under this Policy. Respondent shall have the right to receive a copy of the allegations levelled against her/him.

4. GRIEVANCE

- 4.1 Grievance is any discontent or dissatisfaction, whether expressed or not, arising out of anything connected with the Company which an Employee thinks, believes and even feels to be unfair, unjust or inequitable. It could be against an individual, a group or an Organization. The below list of Grievances is not exhaustive but it is intended to provide general, practical guidance.
- 4.1.1 Compensation (Gender pay difference, pay disparity);
 - 4.1.2 Difference in opinion with supervisors/colleagues/subordinates;
 - 4.1.3 Feeling of bias, neglect and humiliation;
 - 4.1.4 Workplace harassment;
 - 4.1.5 Supervisor's behaviour;
 - 4.1.6 Adverse changes in employment conditions;
 - 4.1.7 Promotional opportunities;
 - 4.1.8 Termination, except where as a result of a disciplinary action;
 - 4.1.9 Delay in or denial of reimbursement of bills or allowances which were timely submitted;
 - 4.1.10 Unjustifiable denial of Leave/compensatory leave;
 - 4.1.11 Denial of request for change of role or post considered mismatched by the Associate;
 - 4.1.12 Any other grievance
- 4.2 Grievance pertaining to; or arising out of the following shall not come under the purview of this Policy.
- 4.2.1 Annual performance appraisals/Confidential Reports; adverse remarks be communicated;
 - 4.2.2 Grievances pertaining to sexual harassment at workplace to be covered under the Company's POSH Policy; and
 - 4.2.3 Grievance arising out of disciplinary actions.

5. CONSEQUENCES OF EMPLOYEE GRIEVANCE

- 5.1 Unattended grievances of an Employee can have an adverse impact on:
- 5.1.1 Employee's behavior, performance and relationships at work;
 - 5.1.2 On the overall performance, effectiveness of the Company.
- 5.2 At the Organization level, it may lead to:
- 5.2.1 Low Employee morale;
 - 5.2.2 Absenteeism;
 - 5.2.3 Poor interpersonal relations;
 - 5.2.4 Reduced productivity and poor quality of work;
 - 5.2.5 Poor Inter-personal communication leading to reduced output;
 - 5.2.6 Poor work environment and sporadic acts indiscipline.

6. POSITIVE DIMENSIONS OF EMPLOYEE GRIEVANCE

- 6.1 Grievance may also have positive dimensions, hence, should be addressed as a matter of priority and in an appropriate manner.
 - 6.1.1 A grievance, once it is addressed, prevents future acts of indiscipline and deterioration of the work environment;
 - 6.1.2 It may also bring out inappropriate conduct on the part of an Employee and irregularity or a malpractice;
 - 6.1.3 The fact that the Employee do not hesitate to express their grievance is indicative of a free, healthy and positive work environment. It is also indicative of free and unhindered vertical communication within the Company;
 - 6.1.4 Grievances may also bring out areas of work in which improvements are called for.

7. GUIDING PRINCIPLES

- 7.1 Whenever the grievance procedure is being followed, the following elements shall be considered while dealing with the issues fairly:
 - 7.1.1 The problems in the work place should be resolved amicably, at the earliest possible opportunity and usually with the least possible formality with helping hand of supervisors and seniors;
 - 7.1.2 All efforts shall be made to address matters before they reach the stage of becoming a formal grievance issue.

8. GRIEVANCE REDRESSAL COMMITTEE

- 8.1 A Grievance Redressal Committee (“GRC” or the “Committee”) has been constituted, as per “Annexure-I” to this Policy, to deal with grievances of the Employees under this Policy. It shall be a standing committee and shall continue to remain in existence until dissolved by the Company through a specific order.
- 8.2 The Committee shall not become inoperative by reason of a vacancy being caused by way of resignation, transfer, etc. In the event of a vacancy being caused, the Committee shall be competent to co-opt any Associate of the Organization as a member with prior approval of the CEO of the Organization.

9. ROLES AND RESPONSIBILITIES OF GRC

- 9.1 The GRC shall be responsible to ensure that grievances are dealt with effectively in accordance with the procedures set out under this Policy. The GRC and senior members of the Company shall ensure that sufficient advice and guidance is provided to the Complainant and the Respondent. In doing so, GRC shall adhere to the following principles:
 - 9.1.1 Take grievances seriously considering why the Employee feels aggrieved, unhappy or dissatisfied;
 - 9.1.2 The Committee shall strictly adhere to the principles of natural justice while conducting an enquiry into a complaint and shall grant sufficient right and opportunity to the Respondent to present himself/herself and submit a reply;

- 9.1.3 Ensure that effective counselling is provided to the Employee and actively look for a solution that will address the Employee's grievances;
- 9.1.4 Give feedback to the Employee about the action which has been taken to redress his/her grievance.
- 9.1.5 Shall meet as may be required in terms of handling the complaints or as per applicable law.

10. REPORTING & REDRESSAL PROCEDURE

10.1 *Reporting of Grievance*

- 10.1.1 Grievance shall be filed in writing to the Chairperson of the Grievance Redressal Committee. In case the complaint has been received by any other member of GRC, then it shall be placed before the Committee for their information.
- 10.1.2 There would also be occasions when a grievance is expressed collectively by a group of Employees rather than by a single Employee. This could be against an individual or about service or work place related. In such cases it would be best for the GRC to call the entire group and hear the representatives. Submission of a written representation in these cases signed by all aggrieved members would be in order. Group should select the persons that would present their case.

10.2 *Grievance Redressal Procedure*

- 10.2.1 There will be a three-tier grievance procedure with further provision of appeal, as detailed herein-below.
- 10.2.2 The Committee shall strictly adhere to the principles of natural justice while conducting an enquiry into a complaint. Given below is the process that shall be adopted while conducting an enquiry into a complaint. Though the procedure delineated below shall be adopted for all grievances, but if the Committee is of the view that in a given case there is a need to deviate from the laid-down process to ascertain the truth, it shall be at liberty to do so.

10.3 *Stage - I: Informal*

- 10.3.1 Any grievance of an Employee should be first discussed verbally by him/her with the immediate supervisor;
- 10.3.2 If grievance is with the supervisor itself and Employee is not comfortable to connect with supervisor, in such cases Employee should connect directly with Head of Human Resource Department;
- 10.3.3 Head of Human Resource Department will first set up informal meeting with both the involved parties to discuss, understand and resolve the grievance through conciliation within 5 working days of the reporting thereof.

10.4 *Stage - II: Formal*

- 10.4.1 In case the Employee is not satisfied with the decision communicated to

- them at Stage-I or fails to receive the reply within stipulated period, such Employee may submit his/her grievance, by filling a Grievance Reporting Form, as per “Annexure-II” of this Policy, to the GRC for the latter’s consideration. At this stage, the grievance will be looked into by GRC;
- 10.4.2 A written acknowledgement shall be sent to the Complainant within 3 working days of the receipt of the complaint/grievance by GRC;
 - 10.4.3 The Complainant who has filed a Stage-II grievance may be allowed to present his/her case in person, and may be allowed to be assisted by a co-worker of his or her choice before the Committee;
 - 10.4.4 When either Complainant or the Respondent desires to submit any document by way of evidence before the Committee, they shall be permitted to produce such documentary evidence, production of photocopies of documents duly authenticated shall suffice. In case the Complainant is not in a position to produce a document in support of the allegations due to the fact that such documents are in possession of another Employee, in such an eventuality the Committee, in the interest of justice, and if it considers the documents relevant, may summon those documents from the Employee, in whose possession they are;
 - 10.4.5 If the Complainant wishes to examine some witnesses in support of the allegations levelled by him/her, Committee may permit the same and examine all the witnesses cited by him/her, who are considered relevant to the facts of the case by it. The Committee shall have the power to refuse examination of a witness cited by the complainant who is considered to be irrelevant to the subject Enquiry;
 - 10.4.6 The Committee may, subject to justifiable reasons and circumstances shall on request of the aggrieved, permit Complainant’s request for examination of witnesses. It shall also afford an opportunity to the Respondent to produce witnesses, in its defence;
 - 10.4.7 The Committee shall, before taking up a complaint for enquiry communicate about the same to the Complainant and Respondent;
 - 10.4.8 The Committee shall provide every reasonable opportunity to the Complainant and Respondent, for putting forward and defending their respective cases;
 - 10.4.9 The Committee will meet at regular fixed intervals to deliberate upon all such grievances as are addressed to it. In the event of difference of opinion amongst the members of the GRC, decision of majority will be prevailing;
 - 10.4.10 GRC shall give report and submit its findings to the Head of Human Resources of the Company. The GRC shall provide a copy of its report to the Complainant and Respondent;
 - 10.4.11 The GRC recommendations should be implemented within 30 days of the communication thereof;
 - 10.4.12 If it is found that a member of the Committee has prima-facie violated the provisions of this Policy, he/she shall forthwith be removed from their post.

10.5 **Stage - III: Representation**

- 10.5.1 A representation shall lie on the basis of the recommendations made by the GRC.
- 10.5.2 If the Employee is not satisfied with the findings about his/her grievance at Stage - II and wishes to file a written representation he/she should let the GRC know. The Employee shall be invited to a representation within 5 working days of communication thereof and the representation will be heard by Human Resources Head of the Company.
- 10.5.3 While deciding the Representation, the competent authority shall provide a personal hearing to the Complainant Associate and “Associate complained against” along with their submissions. The order disposing off the representation shall be the speaking order.
- 10.5.4 The designated authority at this stage will be responsible for hearing, deciding on appeals, mediation and finding resolution.
- 10.5.5 No second representation shall lie against the administrative action taken on the basis of recommendation of GRC

11. DECISIONS

- 11.1 The Committee shall invariably attempt to reach a consensus. The decision taken after Stage III shall be final and binding on all parties.

12. NON-RETALIATION

- 12.1 Information on Employees reporting violations or potential violations of this Policy shall remain confidential. The Company’s culture does not encourage any semblance of retaliatory behavior against the Complainant.

13. RECORD RETENTION & ACCESS

- 13.1 The Committee should ensure that the following minimal set of records are maintained. Human Resources department shall ensure the filing and safekeeping of the records.
 - 13.1.1 Written grievance statement;
 - 13.1.2 The nature of the grievance;
 - 13.1.3 Evidences;
 - 13.1.4 Reports & recommendations of the GRC (including the interim-report as well as the final one);
 - 13.1.5 Corrective action taken on the GRC Reports;
- 13.2 All documentation pertaining to a Complaint will be maintained for a period not less than two (2) years from the date of disposal of the complaint.

14. CONFIDENTIALITY

- 14.1 All reports and records associated with complaints under this Policy are considered

confidential information and access will be restricted by the Company, as deemed fit.

14.2 All members of the GRC, as well as any staff member questioned in relation to an issue at hand, are bound by the duty of confidentiality and sensitivity at all times and hold in confidence, all documentation and information exchanged in the process.

14.3 All concerned records shall normally not be disclosed except in cases as required under any legal obligations or judicial orders.

15. CONTACT

15.1 Any questions/clarifications regarding this Policy shall be referred to Human Resource Department

16. AMENDMENT IN THE POLICY

16.1 The Company reserves the right to amend this Policy, as it may deem fit.

Grievance Redressal Policy

The details of the members of the GRC are:

S. No	Name	
MANAGEMENT REPRESENTATIVES		
1.	Name & Designation (Chairperson)	
2.	Name & Designation	
3.	Name & Designation	
<u>EMPLOYEES REPRESENTATION</u>		
1.		
2.		
3.		

ANNEXURE-II
GRIEVANCE REPORTING FORM

Grievance Redressal Policy

1. Name of Employee: _____
2. Department: _____
3. Reporting Date: _____
4. Date of incident giving rise to grievance _____
5. Description of issue or event giving rise to grievance:

6. Description of action sought:

-
-

FOR USE BY GRIEVANCE REDRESSAL COMMITTEE MEMBERS

Step 1: Date of verbal discussion _____

Comments:

Committee Members Initial _____

Step 2: Date of written grievance received _____

Comments:

Committee Members Initial _____

Step 3: Date grievance received _____

Comments:

Committee Members Initial _____

Step 4: Date grievance closed and communicated _____

Comments:

Committee Members Initial _____