

# KDDL Grievance Mechanism Policy

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## 1. Preamble and Commitment

KDDL Limited (“the Company” or “KDDL”) is committed to fostering a fair, transparent, inclusive, and respectful work environment. The Company recognizes that an effective grievance mechanism is essential for addressing concerns promptly, preventing escalation of issues, and strengthening trust among employees and stakeholders.

This Grievance Mechanism Policy (“Policy”) establishes a structured framework to enable employees and other stakeholders to raise grievances relating to employment, workplace practices, human rights, or working conditions or any other matter arising out of or in connection with their association, engagement, or dealings with the Company, and to ensure that such grievances are addressed in a timely, impartial, and confidential manner.

## 2. Statutory and Governance Framework

This Policy is framed in alignment with:

- Applicable provisions of the Companies Act, 2013 and SEBI Listing Regulations
- All applicable Indian labour and employment laws in force,
- UN Guiding Principles on Business and Human Rights (UNGPs),
- Industry best practices in grievance redressal and workplace ethics,
- KDDL’s internal governance policies, including the Human Rights Policy, Child Labour Policy, Forced Labour Policy, Whistle Blower Policy, and POSH Policy.

## 3. Objective

The objectives of this Policy are to:

- Provide a clear and accessible mechanism for raising grievances.
- Ensure fair, impartial, and time-bound resolution of grievances.
- Promote transparency and accountability in grievance handling.
- Prevent retaliation or victimization of individuals raising grievances in good faith.
- Address concerns arising from the Company’s interactions, operations, or business relationships with stakeholders in a responsible and ethical manner.
- Strengthen workplace harmony and ethical governance.

## 4. Scope and Applicability

This Policy applies to grievances raised by:

- Permanent, temporary, probationary, contractual employees, trainees, and apprentices.
- Contract workers deployed through contractors.
- Other stakeholders, where applicable, in relation to workplace, employment-related, or business-related concerns arising from the Company's operations, practices, or engagements.

This Policy covers grievances relating to, inter alia:

- Terms and conditions of employment.
- Workplace behaviour, dignity, and respect; - Health, safety, and working conditions.
- Human rights concerns (excluding matters specifically covered under POSH or Whistle Blower mechanisms).
- Any other matter affecting an individual's employment or work environment.

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## 5. Guiding Principles

The grievance mechanism shall operate on the following principles:

- **Accessibility:** Easy access to grievance channels.
- **Confidentiality:** Protection of identity and information.
- **Fairness:** Impartial assessment and resolution.
- **Timeliness:** Defined timelines for redressal.
- **Non-Retaliation:** Protection against victimization.
- **Transparency:** Clear communication of outcomes.
- **Accountability:** Designated personnel are responsible for grievance handling and resolution.
- **Impartiality:** All concerns to be addressed and reviewed fairly and without bias.

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## 6. Grievance Redressal Structure

### 6.1 Grievance Redressal Committee (GRC)

The Company shall constitute a **Grievance Redressal Committee (GRC)** at the unit and corporate level, comprising:

- A senior management representative (Chairperson), not below the level of General Manager.
- Human Resources representative.
- Functional Head or nominee.
- Any other member as deemed appropriate by Management.

The composition may be modified depending on the nature of the grievance.

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## 7. Grievance Reporting Mechanism

Grievances may be raised through any of the following channels:

- Written complaint submitted to the immediate supervisor or HR, or
- Email addressed to the designated HR or grievance email ID, or
- Submission through any internal grievance portal or mechanism, where available.

Provided that all grievances relating to **sexual harassment** shall be addressed strictly under the POSH Policy, while **serious misconduct, unethical behavior, fraud, or legal violations** shall be addressed under the Whistle Blower Policy.

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## 8. Grievance Handling and Resolution Process

- Upon receipt, the grievance shall be acknowledged within **seven (7) working days**.
  - The GRC shall conduct a preliminary review and may seek additional information.
  - The grievance shall be investigated in a fair and impartial manner.
  - The Company shall endeavour to resolve grievances within **thirty (30) days** from receipt, subject to complexity.
  - The decision and corrective actions shall be communicated to the complainant.
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## 9. Escalation Mechanism

If the complainant is not satisfied with the resolution (refer Annexure I):

- The grievance may be escalated to the next higher authority or Corporate HR.
  - In exceptional cases, escalation may be made to Senior Management.
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## 10. Confidentiality and Protection Against Retaliation

- All grievances shall be handled with strict confidentiality.
  - No individual shall be subjected to retaliation, discrimination, or victimization for raising a grievance in good faith.
  - Any act of retaliation shall be treated as a serious misconduct.
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## 11. Records, Documentation and Communication

- The Company shall maintain records of grievances received, actions taken, and closure status.



- Records shall be maintained in compliance with applicable data protection and record retention requirements.
- A copy of this Policy shall be made available on the company website.

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## 12. Review and Amendment

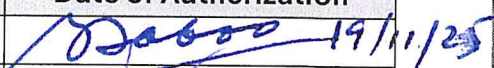

This Policy shall be reviewed **at least once every two (2) years** or earlier if required due to changes in law, business operations, or governance standards.

In the event of any inconsistency between this Policy and applicable law, the provisions of the applicable law shall prevail.

The Company reserves the right to **interpret, implement, amend, suspend, or withdraw** this Policy or any part thereof, in accordance with applicable law and business requirements. The interpretation of this Policy by the Company's Management shall be **final and binding**, subject to applicable statutory provisions.

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### Authorized By:

Authorizer	Name	Date of Authorization
Managing Director	Mr. Yashovardhan Saboo	 19/11/25
Executive Director	Mr. Sanjeev Masown	

## Annexure I

### KDDL Grievance Escalation Matrix

#### Purpose

This Grievance Escalation Matrix defines the appropriate channels, authority levels, and timelines for escalation and resolution of grievances at KDDL Limited. It ensures clarity, accountability, and consistency in grievance handling across policies.

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#### Guiding Principles for Escalation

- Grievances shall be escalated based on **severity, sensitivity, and risk**.
  - Matters involving **legal violations, retaliation, child/forced labour, fraud, or systemic risk** shall bypass routine grievance channels and be escalated immediately under the Whistle Blower or POSH mechanisms.
  - Confidentiality and protection against retaliation shall apply at all stages.
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#### Communication and Display

This Escalation Matrix shall be:

- Communicated to employees during onboarding.
  - Displayed on notice boards and intranet.
  - Shared with suppliers as part of onboarding and contractual documentation.
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## Grievance Escalation Matrix

Type of Grievance	Primary Channel	Secondary / Escalation Level	Final Authority	Indicative Timeline
Workplace / Employment-related grievance (general)	Immediate Supervisor / HR	Grievance Redressal Committee (GRC)	Corporate HR / Senior Management	Acknowledge: 7 days; Resolve: 30 days
Compensation, working hours, leave, service conditions	HR	GRC	Corporate HR	30 days
DEI / Discrimination (non-POSH)	HR / Grievance Mechanism	GRC	Senior Management	30 days
Sexual Harassment complaint	POSH – Internal Complaints Committee	—	As per POSH Act	Statutory timelines
Human Rights concern (non-serious)	HR / Compliance	GRC	Senior Management	30 days
Human Rights violation (serious / systemic)	Grievance Mechanism	Whistle Blower Policy	Senior Management	As per Whistle Blower Policy
Child Labour / Forced Labour	HR / Compliance	Whistle Blower Policy	Senior Management	Immediate escalation
Supplier / Responsible Sourcing grievance	Procurement / Compliance	GRC / Compliance Head	Senior Management	30–45 days
Land rights / community grievance	Administration / Compliance	Senior Management	Senior Management	Risk-based
Environmental / Biodiversity concern	EHS / Sustainability	Compliance / Senior Management	Senior Management	Risk-based
Data Security / Privacy incident	IT / Compliance	Legal / Senior Management	Senior Management	Immediate containment + statutory timelines
Fraud, corruption, unethical conduct	Whistle Blower Policy	Audit Committee	Board of Directors	As per Policy