



# REFEX GRIEVANCE POLICY AND REDRESSAL MECHANISM



## ABBREVIATION

Sl. No	Abbreviation	Full Forms of Abbreviations
1	RIL	Reflex Industries Ltd
2	HR	Human Resource
3	ESG	Environmental, Social, and Governance
4	POSH	Prevention of Sexual Harassment against Women at Workplace
5	NGO	Non-Governmental Organization
6	IT	Information Technology
7	ABAC	Anti-Bribery & Anti-Corruption
8	SPOC	Single Point of Contact
9	COS	Chief of Staff
10	CHRO	Chief Human Resource Officer

## DEFINITIONS

Sl. No	Terms	Definitions
1	Grievance	A Grievance refers to any communication that expresses dissatisfaction about an action or lack of action, about unfair/wrongful treatment, about the standard of service/deficiency of service or, asks for remedial action.
2	Grievance Handling Mechanism	The mechanisms for receiving, registering, and addressing grievances, complaints or queries received from any of the stakeholders
3	Complaints	An objection to something unfair, unacceptable, or otherwise not up to the relevant standard if any
4	Query	A question, especially one expressing doubt or requesting information
5	Process Owner	A person who is given the responsibility and authority for the performance and managing a process from end-to-end

Sl. No	Terms	Definitions
6	Internal Stakeholders	The individuals and parties that are part of the organization are known as Internal Stakeholders. E.g. Senior Management, employees, workers, contractors, managers, etc.
7	External Stakeholders	The parties or groups that are not a part of the organization, but get affected by its activities are known as 'External Stakeholders'. E.g., Customers, suppliers, regulators, neighbors, service providers, NGOs, etc.
8	Refex Executive Committee	Refex Executive Committee would constitute the Senior Management of Refex

## 1. PURPOSE

The purpose of this document is to establish a system for both internal and external stakeholders to voice their concerns and give transparency on how stakeholder grievances/queries will be managed internally, which aims to reduce conflict and strengthen relationships between the Company and all the stakeholders.

## 2. SCOPE

The grievance policy applies to all internal and external stakeholders of the Company.

## 3. RESPONSIBILITY

The overall responsibility for the implementation of this policy lies with CHRO in coordination with the Company Secretary, ESG Head, Legal Head, IT Head, and COSs (Chief of Staff). The CHRO will be responsible for the end-to-end management of this policy in a timely manner and the acceptable resolution of grievances and queries.

## 4. AUTHORITY

CHRO

## 5. GRIEVANCE POLICY

RIL has an open-door policy with all our Stakeholders which includes but is not limited to clients, customers, employees, workers, regulators, society around us, NGOs, thinktank groups, policymakers, vendors, suppliers, etc., to seek information, lodge complaints, report any unacceptable incident, views, comments and extend appreciation with respect to our people, product, service, and operation. We value and consider all stakeholders' complaints and concerns equally and securely.

**Refex ग्रुप ऑफ कंपनीज के पास हमारे सभी हितधारकों द्वारा सूचना मांगने, शिकायत दर्ज करने, किसी भी अस्वीकार्य घटना की रिपोर्ट करने, विचारों, टिप्पणियों और हमारे लोगों, उत्पाद, सेवा और संचालन के संबंध में सराहना करने की खुली नीति है। इसमें ग्राहकों, कर्मचारियों, श्रमिकों, नियामकों, हमारे आसपास के समाज के लोग, गैर सरकारी संगठनों, थिंकटैंक समूहों, नीति निर्माताओं, विक्रेताओं, आपूर्तिकर्ताओं आदि को शामिल किया गया है, लेकिन इन्हीं तक सीमित नहीं है। हम सभी हितधारकों की शिकायत और चिंता को समान महत्व और गोपनीयता के साथ मानते हैं।**

வாடிக்கையாளர்கள், பணியாளர்கள், தொழிலாளர்கள், கட்டுப்பாட்டாளர்கள், நம்மைச் சுற்றியுள்ள சமூகம், அரசு சாரா நிறுவனங்கள், சிந்தனைக் குழுக்கள், கொள்கை வகுப்பாளர்கள், விற்பனையாளர்கள், சப்ளையர்கள் போன்றவற்றை உள்ளடக்கிய எங்கள் பங்குதாரர்கள் அனைவருக்கும் Refex குழுமம் திறந்த கதவு கொள்கை உள்ளது. தகவல்களைத் தேட, புகார் அளிக்கவும், ஏற்றுக்கொள்ள முடியாத சம்பவம், பார்வைகள், கருத்துகளைப் புகாரளிக்கவும் மற்றும் எங்கள் மக்கள், தயாரிப்பு, சேவை மற்றும் செயல்பாடு தொடர்பாக பாராட்டும் தெரிவிக்கவும். அனைத்து பங்குதாரர்களின் புகார்களையும் அக்கறையையும் சம முக்கியத்துவம் மற்றும் ரகசியத்தன்மையுடன் நாங்கள் மதிப்போம் மற்றும் கருதுகிறோம்.

Do you have anything to reach out to us for? Please contact us at

**यदि आपको कोई चिंता या प्रश्न या शिकायत है तो कृपया निम्नलिखित माध्यम पर हमसे संपर्क करें**

எங்களை அணுகுவதற்கு உங்களிடம் ஏதேனும் உள்ளதா? தயவு செய்து எங்களை தொடர்பு கொள்ளவும்.

[refexcares@refex.co.in](mailto:refexcares@refex.co.in)

**WhatsApp Number – 9629738734**

or

Reach our Local Office in Person

Or

Suggestion/Complaint Box at Sites

## **6. PROCEDURE - GRIEVANCE REDRESSAL MECHANISM**

Grievances, complaints, or queries shall be received through the dedicated toll-free number, email address, suggestion box/complaints box at the site, and or in-person complaint.

### **6.1 Channels for Receiving Grievance/Complain/Query/Suggestion**

#### **6.1.1 E-Mail Address**

A stakeholder can raise a Grievance/Complaint/Query through a dedicated email address which is [refexcares@refex.co.in](mailto:refexcares@refex.co.in) and also, can be raised through email addresses provided under the whistle-blower policy and POSH policy.

#### **6.1.2 WhatsApp Number**

A dedicated WhatsApp Number has been created which will be used for raising Grievance/Complaint/Query. The information seeker or complainants can raise a response through a simple text message. The ownership of this WhatsApp number will be with the concerned SPOC who will receive a text message and will acknowledge the receipt to the complainant or inquirer.

#### **6.1.3 Suggestion/Complaint Box**

A suggestion box will be available at each operation site and site offices to drop written complaints/suggestions by anyone. It will be the responsibility of the site admin to collect and forward these suggestions/complaints/queries to the SPOC within 3 days of receiving the complaint. The box needs to be checked every week by the site in charge or site admin.

#### **6.1.4 In person**

A stakeholder can come and raise a verbal complaint or seek information in person by meeting the site in-charge or site admin. The site admin/site in charge is responsible for collecting all the details with clarity and forwarding this to the SPOC through internal company e-mail.

### **6.2 Role of Site Admin**

The Site Admin is responsible to record the in-person grievances, complaints, or queries that come from the suggestion box/complaint box displayed at offices/project sites. He/she has to forward the received grievances, complaints, or queries within 2 days from the receiving date to the head office SPOC for information and further action.

### 6.3 Role of the SPOC

A nominated person will be the single point of contact (SPOC) at the head office, who will receive these complaints/queries from all means and sources. He/she will have the sole responsibility of;

1. Record keeping of all the queries and or complaints with the formats Grievance/ Complaint/ Query Register (Annexure 1), and Grievance Category Register (Annexure 2) within a week time with the following details;
  - Description of complaint or grievance or query received
  - Date received
  - Mode of inbound information (WhatsApp or email)
  - Identity of the complainant or the inquirer
  - Need for the response and or action
  - Details of action initiated and closeout along with the process owner
  - Grievance category
2. Once the SPOC receives a complaint or query, he/she will forward the received queries and complaints within 3 days from the receiving date to the respective **process owner** to **plan and initiate** action and closeouts with a cc to Group CHRO, Legal Head, Company Secretary and ESG Head.
3. The SPOC will follow up till the closeout action completes and details are updated in the Grievance/Complaint/Query Register (Annexure 1), and Grievance Category Register (Annexure 2).

### 6.4 Approval of Closeout Action Plan or Information to Share

1. The CHRO has to decide whether a closeout action is to be initiated or information to be shared in consultation with the Refex Group Executive Committee.
2. The CEO /MD & CHRO have the combined authority to approve the closeout action/resolution plan or the information to be shared against any query and the confidentiality of the matter.
3. Once it is jointly approved, the CHRO will advise the respective process owner to initiate resolution/closeout action against the complaint/grievance received or to share information against the query.

## 6.5 Role of the Process Owner

1. The process owner analyses the complaints and or queries and should inform the CHRO whether it needs a response and or an action or ignore being illegitimate or not falling under the Company scope in consultation with CHRO, Company Secretary and Legal Head.
2. The process owner is responsible for resolving the queries and responding to the complaints within 7 days from the date of intimation from the SPOC and the duration it may take to resolve the complaint.
3. The process owner is responsible for investigating the grievance and will assist in determining how the grievance is handled and what steps need to be taken to resolve the grievance.
4. Following the investigation, the process owner will use the findings to create an action plan outlining steps to be taken to resolve the grievance in coordination with CHRO, Company Secretary and Legal Head.
5. The process owner is responsible for forwarding the closeout action to CHRO for getting approval from the CEO / MD and CHRO.

The action for the complaints shall be closed within a period up to 90 days based on the nature of the complaints and their impact on the stakeholders.

**Table: List of Process Owners**

Sl. No	Complaint/Query Description	Process Owner	Mail Id
1	Operation-related complaints or queries	Susmitha Siripurapu (RIL)	<a href="mailto:susmitha.s@refex.co.in">susmitha.s@refex.co.in</a>
		Sachin Navtosh Jha (Power Trading)	<a href="mailto:sachin.navtosh@refex.co.in">sachin.navtosh@refex.co.in</a>
2	Legal-related issues, complaints, or queries	Harini S General Counsel	<a href="mailto:harini.s@refex.co.in">harini.s@refex.co.in</a>
3	HR-related complaints or queries, i.e., wages, hiring, benefits & compensation,	Purvesh M Kapadia CHRO	<a href="mailto:purvesh.k@refex.co.in">purvesh.k@refex.co.in</a>



Sl. No	Complaint/Query Description	Process Owner	Mail Id
	training, variable pay, appraisal, promotions, etc.		
4	Corporate governance, shareholder grievances, corruption or any other financial and management irregularities	Ankit Poddar Company Secretary	<a href="mailto:ankit.p@refex.co.in">ankit.p@refex.co.in</a>
5	POSH – Sexual harassment	Harini S President – Internal Complaints Committee	<a href="mailto:harini.s@refex.co.in">harini.s@refex.co.in</a>
6	Pollution, Health, and Safety-related complaints or queries	Gagan Bihari Pattnaik ESG Head	<a href="mailto:gagan.p@refex.co.in">gagan.p@refex.co.in</a>
7	Travel and Accommodation related complaints or queries	Purvesh M Kapadia – CHRO	<a href="mailto:purvesh.k@refex.co.in">purvesh.k@refex.co.in</a>
8	Payment/delay in payment, vendor complaints	Sonal Kumar Jain Chartered Accountant	<a href="mailto:sonal.j@refex.co.in">sonal.j@refex.co.in</a>
9	IT (Data Breach and Privacy)	Shailesh Rajagopalan IT Head	<a href="mailto:shailesh.r@refex.co.in">shailesh.r@refex.co.in</a>

## 6.6 Mediation

RIL supports resolving matters through mediation provided that it is consistent with organizational duties, statutory requirements, obligation if any, and need. Mediation can only be undertaken voluntarily if both parties agree to participate. Matters may be resolved through mediation on in-principle approval from CHRO & Executive Committee.

## 6.7 Confidentiality

Any grievance or complaints reported under this policy shall be treated with all possible care, sensitivity and discretion in protecting the sensibilities of the affected person and no information will be divulged publicly or to any third party which can enable identification of the identity of the affected person unless it intends to do so as per the law.



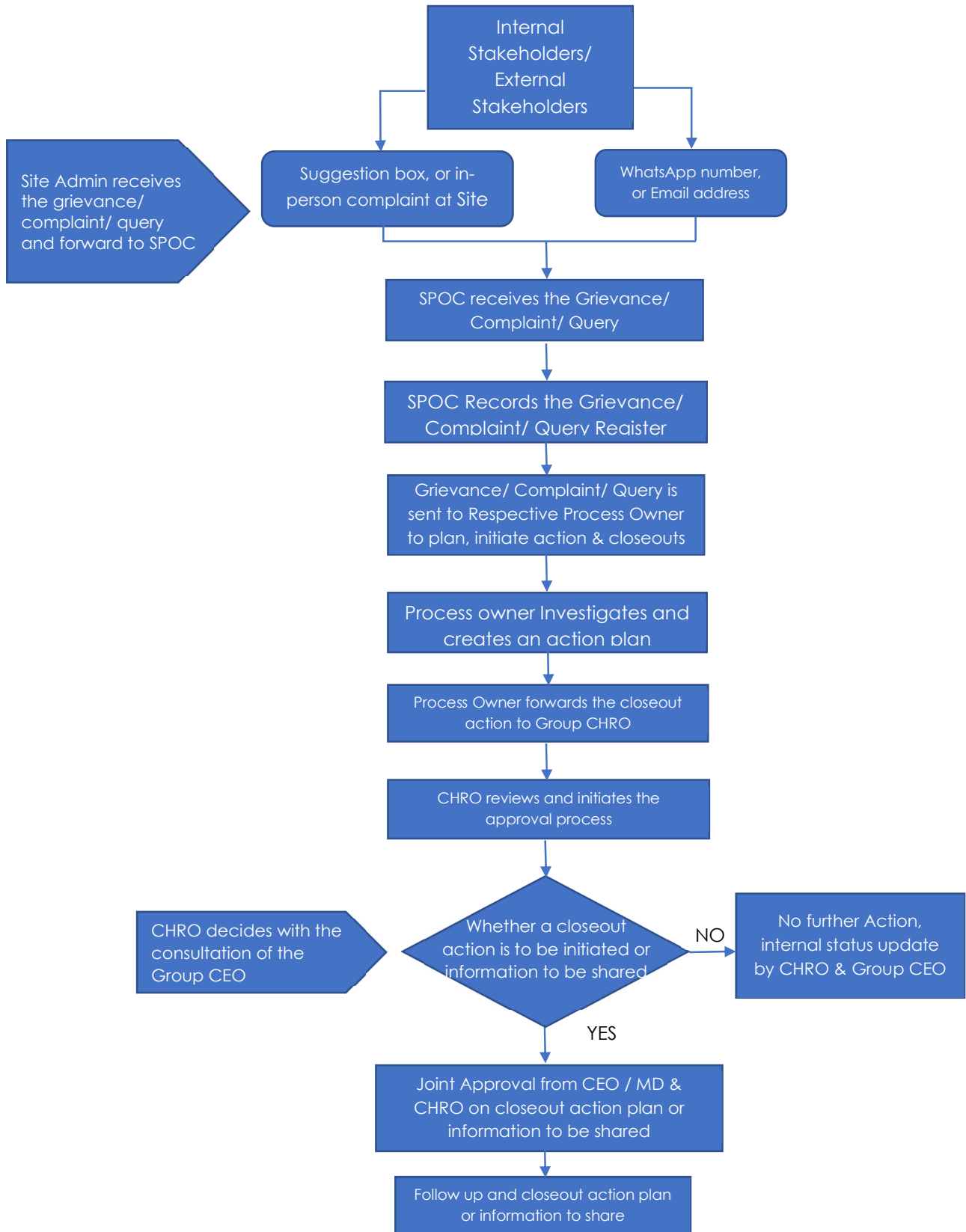
## 6.8 Concurrence with Relevant Policies

This Grievance Policy is not a standalone policy and is to be implemented in concurrence with other relevant company policies and guidance documents which are as follows; All the queries and complaints received under the following policies by the respective process owner/grievance officer/contact person shall be directed to the SPOC for record keeping, to initiate action in a timely manner and close/resolve with acceptable resolution.

- POSH Policy
- Whistle-blower Policy
- HR Handbook/Code of Conduct
- Vendor/Employee Code of Conduct
- IT Policies
- Anti-Bribery & Anti-Corruption (ABAC) Policy

In case of any conflict between this Policy and any of the above Policies, the respective above Policy shall prevail.

## 7. Process Flow Chart



### Annexure 1

#### Grievance/Complaint/Query Register

Sl. No	Description of Complaint or Grievance or Query Received	Grievance/ Complaint (Y/N)	Query (Y/N)	Date Received	Mode of Inbound Information (WhatsApp or Email)	Identity of Complainant or Person Who Sought Query	Does it need a response and or action (Y/N)	Forwarded for Action to COS (Chief of Staff)/HR/Company Secretariate (Name)	Date of Action Initiated	Date of Closeout
1										
2										
3										
4										

### Annexure 2

#### Grievance Category Register

Sl. No	Description of Complaint/Grievance/Query Received	Pollution Related (Y/N)	Health & Safety (Y/N)	POSH (Y/N)	Labour Payment (Low wages) (Y/N)	Vendor/Supplier Payment Delay or Non-Payment (Y/N)	Financial Irregularities (Corruption and Kickbacks)	IT (Data Breach and Privacy) (Y/N)	Child Labour (Y/N)	Forced Labour (Y/N)	Product Quality (Y/N)
1											
2											
3											
4											