

Doc. No.: 2/POL/HR/06

REV. No.: 01

DATE : 14.01.2021

PURPOSE

The purpose of this Policy is to provide a mechanism for interested parties (IP's) to raise a grievance arising from their involvement. The Policy will ensure that grievances are dealt promptly, fairly and in accordance with other related Policies of the Organization. This includes concerns from interested parties about an action that has been taken and or an in-action, or a contemplated action in relation to them by another interested party or from the Management.

This policy should be read in conjunction with other related Policy Documents such as the Code of Conduct, Policy against Harassment, POSH Policy etc. Any additional related Policies passed by the Organization will automatically become conjunct to this Policy.

SCOPE

Following up on internal communication, SGS Tekniks has also decided to apply a procedure for external communications from interested parties. As per IMS (Integrated Management System; ISO9001, IATF16949, ISO14001, ISO45001, ISO13485 and AS9100) implemented in SGS Tekniks, the benefits of effective internal and external communications include demonstrating commitment and efforts of SGS Tekniks in order to improve its overall performance, as a result of such efforts, raising awareness and encouraging dialogue about various issues and concerns of stakeholders pertinent to operations of SGS Tekniks.

IMPLEMENTATION AND RESPONSIBILITIES

The Procedure is applied by Quality, Health &Safety, Human Resources, Environmental and the Administration Departments. All mentioned departments are involved separately in addressing the complaints, (if complaint is addressed to a specific department) or by the Grievance Redressal Committee for IP (if the issue addressed involves the above addressed departments).

Below mentioned personnel shall be responsible for an appropriate addressal of any form of complaints or grievances registered from an external stakeholder:

- Vice-President (VP)
- Head-Operations (HO)
- Factory Manager (FM)
- Human Resources Manager (HRM)
- Safety Officer (SO)
- Management Representative (MR)



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• Deputy Management Representative (DMR)

Quality Manager (QM)

Executive HR (EHR)

Other department HOD's depending on the raised issue

General

Comprehensive data on internal communications is provided through the Manual and Procedures of the IMS System and is described in procedure. External communication includes all processes related to stakeholder communication, excluding complaints for product quality that are addressed separately by the concerned IP's. External communication will also include liaising with regulatory, official bodies, non-regulatory and other bodies and/ or interested parties (including different stakeholders and local community).

EXTERNAL COMMUNICATION (regulatory and official bodies)

This includes competent government authorities, Regional inspections Agency and other relevant bodies/ authorities.

Sr. No.	Responsible Person	Action	Mode of communication
1	External communications from interested parties	Registering and further communicating the complain/grievance from regulatory and official bodies to the responsible HOD (based on the complaint subject), VP/HO.	Through Online SubmissionE-MailLetter
2	EHR receives the complaint and registers it	EHR directly communicates the complaint	• E-Mail
3	HOD&HO/VP (if issue raised is related with plant operation)	Consult with floor manager (FM)/ HRM on legal responsibilities and communication method.	• E-Mail
4	HOD/HO/VP/FM	Prepares reply to grievance/complaint	Letter E-Mail
5	HOD	Prepare and maintain records of the communication and documents through the Document Control procedure.	Registers the complaint in the "Complaints register"



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EXTERNAL COMMUNICATION (non-regulatory and non-official bodies, institutions and persons' requests)						
Sr. No.	Responsible Person	Action	Mode of communication			
1	Interested parties	Direct request to DMR/EHR for response.	Through Online SubmissionE-MailLetter			
2	DMR/EHR receives the complaint and registers it	DMR/EHR directly communicates the complaint to responsible HOD (based on the complaint subject), VP/HO	• E-Mail			
3	HOD	Consult with VP/HO if a written reply or meeting required with the interested party is to be held.	EmailMeetingMaterial and information on requests			
4	HOD	Prepare and maintain records of the communication and documents through the Document Control procedure.	Registers the complaint in the "Complaints register"			
	EXTERNAL COM	MMUNICATION (initiated by SGS Tekn	iks)			
1	HOD	Decide information to be made public upon consultation with the FM/VP/HO and based on report of SGS Tekniks.	Open Days Website News Outlets			

GUIDING PRINCIPLES

Whenever the grievance procedure is being followed, it is important that issues are dealt with fairly. The following elements shall be considered in doing so:

• All IP's should always try to resolve problems at the earliest possible opportunity and usually with the least possible formality.



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 All efforts shall be put to address matters before they reach the stage of becoming a formal grievance issue.

- All IP's should raise and deal with issues promptly and should not unreasonably delay meetings, decisions or confirmation of those decisions.
- All IP's should act consistently.

SGS TEKNIKS recognizes that a formal grievance procedure can be a stressful and upsetting experience especially for the grieved employee(s) involved. Hence, IP's involved in the process are entitled to be treated calmly and with due respect, while upholding confidentiality of the matter. SGS TEKNIKS will not accept and/or tolerate abusive or insulting behaviour form anyone taking part in or conducting grievance redressal procedures. Any such behaviour will be treated as misconduct under the disciplinary Policies of SGS TEKNIKS.

SGS TEKNIKS also recognizes the diverse needs of the services provided as well as that of the workforce. Hence this Policy is aimed to provide a common platform that ensures the processes implemented under this Policy do not place any IP at an advantage/ disadvantage over others.

TIME LIMITATIONS

This Policy applies to grievances filed once the Policy comes into effect. No grievance shall be heard unless it has been registered through the formal procedure as described under the section "General" within thirty (30) calendar days after the act or the condition giving rise to the grievance.

GRIEVANCE REDRESSAL COMMITTEE for IP

The Management shall appoint a Grievance Redressal Committee for ratification of this Policy.

In appointing members to the committee, proper gender representation and a cross-section of different levels of competent employees shall be considered.

Sr. No.	Name	Designation	Role in Committee
1		GM Operations	Chairperson
2		Corporate Head HR & Admin	Presiding Officer
3		Engineer/Executive	Internal Officer
4		Engineer/Executive	Supporting Officer
5		Engineer/Executive	Member



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ROLES AND RESPONSIBILITIES of Committee

The Grievance Committee shall be responsible to ensure that grievances are dealt with effectively in accordance with the Grievance Procedures set out for the implementation of this Policy.

In doing so, the Committee shall adhere to the following principles

- Take grievances seriously taking on board why the IP's feels aggrieved, unhappy or dissatisfied,
- Investigate the facts and surrounding circumstances, and showing the IP's that this has been done thoroughly and sensitively,
- Actively look for a solution that will satisfy the IP, where practical, without causing disproportionate difficulty for the organization or the IP's,
- Provide feedback to the IP's about what can/ cannot be done to resolve the grievance,
- Addressing the complaints, if the issue addressed involves the responsible persons departments.
- Review the policy time to time,
- Take necessary follow-up action.

RECORDS

The Committee should ensure that the following minimal set of records is kept for matters attended by the Committee. EHR/DMR shall be the responsible and will ensure the filing and safekeeping of the records.

- The nature of the grievance
- Written grievance statement
- Action taken or to be taken with reasons for it
- A written statement of the decisions

CONFIDENTIALITY

All members of the Grievance Committee and those assigned for record keeping, as well as any interested party questioned in relation to an issue at hand, are bound by the duty of confidentiality at all times and hold in confidence, all documentation and information exchanged in the process. Any violation should be dealt with as per the provisions of the applicable Code of Conduct for violation of Confidentiality norms.