

- Scope: The purpose of the Grievance Policy/Procedure is to assist in resolving workplace issues/problems as they develop. We recognize that workplace challenges may arise from time to time and have found that the best way of maintaining job satisfaction and good working relationships is to follow a procedure for solving problems and grievances. The procedure aims to provide all employees with several avenues to have their grievances heard and resolved.
- ➤ Applicability: This policy is applicable to the entire organization, our partners, our vendors, suppliers, contractors or anybody we do business with.

> Definition:

- A) **Grievance:** A grievance is any type of problem, concern or complaint related to work or the work environment, for example, you could have a grievance about:
 - 1) transfer or promotion
 - 2) staff development or training availability
 - 3) rosters or hours of work
 - 4) wage or salary levels
 - 5) leave allocation
 - 6) the work environment
 - 7) safety in the workplace
 - 8) the nature of supervision
 - 9) performance appraisal
 - 10) discrimination or harassment,
 - 11) with Community,
 - 12) within Community
 - 13) a Health / Safety & Environment emergency or incident.

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- 14) a grievance may be about any act, omission, situation, or decision that an employee thinks is unfair, discriminatory or unjustified.
- B) Our policies regarding Equal Employment Opportunity, Bullying and Harassment and Discriminatory outline the types of behaviour that are and are not acceptable within our workplace.

Abbreviations:

o AP - Aggrieved Person

o CCCS - Concern, Complaint, Claim or Suggestion

o EHS - Environment, Health, and Safety

o HR - Human Resource

o NGO - Non-Governmental Organization

P&A - Personnel and Administration

o PIC - Project/Plant in Charge

o TLL - Transrail Lighting Limited

- C) Policy Statement: Transrail Lighting Limited shall strive to solve the grievances promptly. The Grievance mechanism must be locally implemented at the project/Plant level.
- Transrail Lighting Limited shall strive to make sure of a timely disposal of Grievances. To Aware the Community and Labour, the Transrail Project site shall display/distribute leaflets as well as putting up by displaying the information on the Notice board (Contact No/Address) etc. of the staff charged with grievance collection.

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- Transrail Lighting Limited's Grievance Redressal Mechanism Committee shall accept any complaints and grievances in a friendly manner with a professional attitude and offer all possible help to AP.
- In the first step complaints resolution shall be attempted at the project/site level in a negotiation procedure with an informal mediator and project/ community authority. If the grievance persists, then the grievance must be brought to the notice of the committee. If He/She or the Community is not satisfied with the outcome of COMMITTEE's decision, then they are free to approach the Competent Authority. The decision has to be taken within 15 days. Members of the grievance committee shall be:
 - I. Representative,
 - II. sub-contractor of project,
 - III. Project authority at site level by company,
 - IV. local administration.
 - V. lawyer and
 - VI. NGO. (If required).

• Transrail shall be responsible to include a social (and gender):

- I. Coordinate the grievance redress procedure.
- II. Arbitrate grievance with sub-contractor, AP and Local Administration/ Community leader.
- III. Liaison with Client as appropriate.
- IV. Liaison with court/ government body.
- V. Documentation of all grievance and resolution procedures.
- VI. Documentation description of incident or emergency or harmful environmental nuisance caused, shall be noted with Name, Date, Time, Place & contact

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number (preferably Mobile number) by the committee member and shall produce the same before the Authority.

- Community & Labours will act as informal mediators in case of complaints. However,
 Aps have the option to choose an alternate representative or direct liaison with the
 Grievance Redressal Mechanism Committee of Transrail Lighting Limited. All
 grievances and their resolution process shall be documented. Transrail Lighting
 Limited shall encourage the aggrieved person (AP) to proceed in the following way.
- Contact the project's designated grievance staff/ grievance committee representative during periodical site visits in person or via a designated telephone number or community leader or NGO staff.
- Lodge complaint and provide information on the case.
- Agree with the project authority/ client/ company on specific mitigation measures.
- Agree with the company on the time limit for grievance settlement. Grievances must be settled within two weeks, or as otherwise specified in the scheduled agreement.
- Sign if the mitigation measure has been implemented as agreed.
- Project I/C shall involve appropriate local authorities to liaison with clients and government bodies.
- Involve project authority/company construction supervision consultant to liaison with the client.
- Transparency about the grievance procedure, governing structure, and decisionmakers.
- Publicly advertised procedures, setting out the length of time users can expect to wait for acknowledgement, response, and resolution of their grievances.
- Complaints received from the affected community and employees must be reported via an established Grievance Mechanism.

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- According to World Bank, the Grievance Mechanisms are divided into two components, namely:
 - A) Project Grievance Mechanism; and
 - B) Worker Grievance mechanism (for project workers to address workplace concerns).
- The grievance mechanism shall be proportionate to the potential risks and impacts
 of the project and will be accessible and inclusive. Where feasible and suitable for
 the project, the grievance mechanism shall utilize existing formal or informal
 grievance mechanisms.
- The grievance mechanism shall address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all project-affected parties, at no cost and without retribution. The mechanism, process or procedure will not prevent access to judicial or administrative remedies. The Client and Transrail Project Team shall inform the project-affected parties about the grievance process during its community engagement activities and will make publicly available a record documenting the responses to all grievances received.
- Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the needs and concerns of the project-affected parties. The mechanism shall allow any anonymous complaints also.
- D) Non-Compliance: Transrail Lighting Limited shall immediately take corrective action when notice of non-compliance is received. Complaints received regarding activities on the construction site pertaining to health, safety, environmental and social issues

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associated with the project/Plant must be recorded via the established grievance mechanism and the response(s) noted with the date and action taken.

* Roles and Responsibilities:

• CCCS receiver (Immediate Manager, Human Resources / P&A Department,):

- A) Provide information on the next process steps to the Employee submitting the CCCS.
- B) For "positive" CCCS: Communicate to the representative responsible for managing the Employees Grievance Mechanism in the agreed reporting mechanism.
- C) For CCCS having less GRAVITY, communicate it to the representative responsible for managing the Employees Grievance Mechanism using the Employees Grievance Form.

The Person Responsible for the Resolution:

- A) Assess the grievance and propose a resolution.
- B) If a resolution is not agreed upon within the time, arrange meetings and discussions with the affected people, TLL HR-P&A designated authority / Project director and the relevant departments along with the leadership team and should agree on a final solution.
- C) Review, verify and submit the proposed resolution to the affected employees.
- **D)** Inform the representative responsible for managing the employee's grievance mechanism of the resolution reached.

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• Admin - P&A/EHS/Project Office/Manager/Director:

- A) After receiving the CCCS- support the person responsible for the grievance resolution.
- B) In collaboration with the representative responsible for managing the Employee's Grievance Mechanism and the HR-P&A Corporate Manager, monitor and evaluate the Worker's Grievance Mechanism Plan.

• HR – P&A Corporate Manager/Project Director:

- A) Support the person responsible for the grievance resolution participating in meetings and discussions to reach a final solution, as needed.
- B) In collaboration with the representative responsible for managing the Employees Grievance Mechanism and HR-P&A Manager / Project Director, monitor and evaluate the Grievance Mechanism Management Plan.
- C) Annually assess and document performance against the requirements of this procedure, and report to Senior Management.

• Person Responsible for the Resolution (Sub-Contractor):

- A) Assess the grievance and propose a resolution.
- B) If a resolution is not agreed upon within the time, arrange meetings and discussions with the affected people, HR-P&A Corporate Manager / Project Director, and the relevant departments along with the leadership team and should agree on a final solution.
- C) Review, verify and submit the proposed resolution to the affected Employees.
- D) Inform the representative responsible for managing the employee's grievance mechanism of the resolution reached

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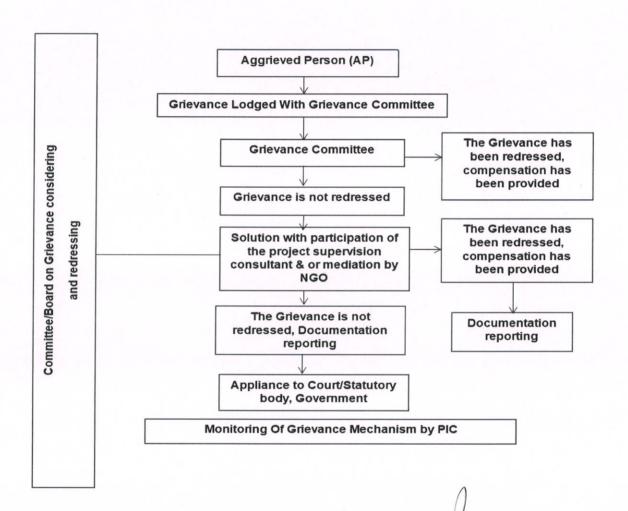


- Representative Responsible for Managing the Employees Grievance Redressal Mechanism (Sub-Contractor):
- A) Collect grievances from CCCS receivers and record them in the Employees' Grievances Register.
- B) For "positive" CCCS: Inform the Corporate HR and Project Director as applicable.
- C) For CCCS with less GRAVITY, Inform the person or persons responsible for the grievance resolution.
- D) Report closed-out cases to Site Admin / HR Manager, and HR-P&A Corporate Manager / Project Director monthly.
- E) Keep track of all grievance cases through the Employees' Grievances Register.
- F) In collaboration with the Site Admin / HR Manager, and the HR-P&A Corporate Manager / Project Director, monitor and evaluate the Grievance Mechanism Plan.
- Annual Performance Review: On an annual basis, HR-P&A Head, will assess and
 document TLL's performance against the requirements of this procedure. The HRP&A Corporate Head will submit the results of the assessment to Senior
 Management. The assessment shall include employee grievances reported and
 solved, corrective actions undertaken, and the status of corrective actions
 implemented. The results of the assessment will serve as the basis for Senior
 Management to make decisions on additional preventive/corrective actions to be
 implemented at the site.

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❖ Grievance Flow Chart:



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Managing Director & CEO

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