

Grievance Mechanism and Remediation Procedure

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1. Objective

The Grievance Redressal procedure at AMI LIFESCIENCES PVT.LTD. aims to reinforce the organization's commitment towards providing fair and equitable work opportunities to all employees. The objective of the grievance resolution process is to provide employees with an easily accessible mechanism for settlement of their individual grievances.

2. Scope and Applicability

This policy applies to all staff of AMI LIFESCIENCES PVT.LTD. and those of Partner organizations who are in a relationship with AMI LIFESCIENCES PVT.LTD.

Not all grievances are related to HR. Grievance covers a wider area in the Organization, particularly those which are not directly related to or in the employee's immediate work area and people, but, in other areas which, though not frequented very often, they necessitate interaction for work purposes or for co-existence in the workplace by the employee. These areas can relate to Cafeteria, Transport, Office maintenance, Administration, infrastructure, lighting, air-conditioning, WFH support, etc.

This policy aims to focus on non-HR related areas, with the resolution responsibility involving the line manager of the department concerned. HR is certainly kept in the loop since the locus is around the employee and the incident.

HR related grievances are covered in Code of Conduct Policy, POSH Policy, Employee relationships Policy, Violence at workplace Policy, EEO&AD policy, Maternity benefits Policy, etc

AMI LIFESCIENCES PVT.LTD. will endeavor to address the grievance to the best possible extent as far as it is feasible, within its scope, is reasonable & has a larger impact to other employees, within legal / statutory ambit and is cost effective.

AMI LIFESCIENCES PVT.LTD. reserves the right to reject, cancel or postpone any grievance without assigning any reason whatsoever.

3. Policy/Process

4.1. Policy Statement

The policy is developed to provide mechanism to report Grievances related environment, labour human rights, ethics, sustainable procurement for following matter & based on analysis and investigation define action against the same through committee and apply remediation measures:

- Child Labour force Labour
- Corruption or bribery case

- Any other working condition related issues
- Affinity group or minority group having issues
- Anti-competitive practices
- Diversity discrimination or workplace harassment
- External/Internal stakeholder holder human rights
- Ethics related issues
- Human trafficking
- Money laundering
- Fraud
- Woman development related issues
- Code of Conduct Policy,
- POSH Policy,
- Employee relationships Policy,
- Violence at workplace Policy,
- Maternity benefits Policy.
- Employee Performance Appraisal & Salary review policy
- Grievance pertaining to, or arising out of, disciplinary action or appeal against such actions.
- Grievance arising out of termination/dismissal

4.2. Grievance Statement and Policy

A grievance can be defined as any sort of dissatisfaction, which needs to be addressed in order to enable staff to function efficiently and effectively within the organization. A grievance is a sign of an employee's discontentment with his/her job or work environment or equipment / tools or workstation or relationship with colleagues.

Broadly, a grievance can be stated to be any discontentment or dissatisfaction with any aspect of the organization, except as stated in Sec.4.1 of this document, which if resolved purposefully, benefits the Organization, or employees and if not handled assertively, tactfully and empathetically, can disturb the equilibrium in the relationships and rapport levels.

AMI LIFESCIENCES PVT.LTD.'s grievance policy is designed to provide an effective procedure for resolution of problems, wherever it is feasible or possible and are within the source, resource and limits of the organization. AMI LIFESCIENCES PVT.LTD.'s policy engrains a disciplined procedure that will ensure consistent and equitable treatment to all employees.

Any grievance pertaining to HR-related matters will be dealt with by HR in accordance with the appropriate policy guidelines as mentioned in Sec.4.1 of this document, including any disciplinary actions or procedures.

4.3. Criteria

Except for gross misconduct, no employee will be dismissed for a first breach of discipline under this policy. The level of any formal action will be dependent on the seriousness of the offence, having regard to the need for fairness and natural justice.

The procedure is internal to AMI LIFESCIENCES PVT.LTD. and does not allow for any external representation.

No disciplinary action will be taken against an employee until the case has been fully investigated.

4.4. Grievance Redressal Procedure

- The following process should be followed for expressing and seeking redressal to a grievance
- Employees may communicate their grievance in writing to their manager first while at the same time, addressing a copy to the concerned department Head. In case the grievance involves the Manager, then the employee can contact the Manager, while simultaneously copying the concerned.
- The concerned manager must immediately acknowledge receipt of the grievance in writing, informing the employee of the receipt of grievance and inviting the employee for a formal meeting.
- If the grievance pertains to the same function where the employee works, the Manager has to review and resolve the same based on the feasibility or commit to a timeline by which the same could be resolved as per dependency on other departments / functions / vendors or factors.
- In other cases, Manager may consult with the concerned departments or functions to which the grievance pertains to for their action or feedback and revert to the employee with a course of action / solution within 7 working days from the date of receipt of grievance.
- In case an employee is not satisfied with the solution, the employee may choose to represent the grievance to Department Head (or to a LT member), if the grievance concerns the Department Head.
- The Leadership Team (LT) member will convey their decision to the aggrieved employee through the concerned department manager within 5 days of receipt of the complaint. If, however, the LT is of the view that the matter should be referred to the Grievance Resolution Committee, they may do so
- The **Grievance Resolution Committee consists of a minimum of three members from the Leadership Team and the concerned department Manager and any manager except from his or her own manager.**

The Grievance Resolution Committee (as mentioned below) will provide an opportunity to the aggrieved employee and the concerned person involved in the grievance, to present their concern. The Grievance Resolution Committee will include representatives from other teams to ensure fair and faster resolution.

| Name | Designation | Mobile No | Email |
|------------------|-------------------------|------------|----------------------------------|
| Mr. Hiren Shah | Director | 9904446900 | hiren.shah@amilifesciences.com |
| Mr. Birju Mistry | Head HR and Admin | 9601608415 | birju.mistry@amilifesciences.com |
| Mr. Harsh Patel | Head Plant HR-Operation | 8980029084 | harsh.patel@amilifesciences.com |

- The Grievance Resolution Committee will give their recommendation to the LT within 4 working days. The LT will take a decision based on this recommendation and communicate their decision through the concerned department Manager to the aggrieved employee within 15 working days from commencement of inquiry
- Grievances will be treated with utmost confidentiality and sensitivity
- Human Resources shall maintain a record all grievances referred to the Grievance Resolution Committee, number of grievances settled/ pending and report to the Senior Management Team on a quarterly basis

4.5. Gross misconduct

In case the grievance by an employee leads to discovery of gross conduct by another employee(s) or associates or vendors of AMI LIFESCIENCES PVT.LTD., appropriate action will be taken by HR, while the identity of the complainant will not be disclosed in any manner or forum.

The list provided below is illustrative but not exhaustive, and should be deemed that any other conduct not falling within the purview of what is stated below is akin to gross misconduct; the LT will exercise the authority in consultation with the Grievance Redressal Committee to determine gross misconduct depending on the circumstances of each case

- Fraud
- Deliberate falsification of records
- Embezzlement
- Theft
- Intimidation, harassment, threats or acts of violence.
- Misuse or misappropriation of position or benefits.

- Willful damage to an organization's assets, including those of its employees, partners, other stakeholders.
- Disparagement or defamation of the Organization, its employees, partners, or other stakeholders
- Taking or giving bribes or any other illegal gratification, including sexual gratification
- Serious incapability due to being under the influence of alcohol or being under the influence of illegal drugs at the workplace and during working hours.
- Serious negligence which causes unacceptable loss, damage, or injury
- Serious act of insubordination
- Deception or inappropriate access to private and/ or confidential Company records and/ or information without authorization or need-to-know.

4.6. Appeals

An employee who wishes to appeal against a disciplinary decision must do so within five working days. The Grievance Redressal Committee will hear all appeals and will make a recommendation to the LT. Where felt appropriate and in very serious cases, the LT may further consult the Board. The LT's decision will be final and communicated in writing to the employee by the concerned department Manager. At the appeal, any disciplinary penalty imposed will be reviewed.

Should an employee wish to appeal they must do so in writing to the appropriate manager within five working days of being informed in writing of the formal action.

| <u>Minimum level of authority</u> | <u>Action</u> | <u>Opportunity to appeal</u> |
|-----------------------------------|------------------------------------|---------------------------------|
| Line Manager | Oral warning / Written warning | Head of Department |
| Concerned Department Manager | Written warning | Head of Department /LT |
| Head of Department | Final written warning Dismissal | CEO or nominated representative |

A request for an appeal must specify the grounds of the appeal, preferably under one or more of the following headings:

- The severity of the action
- The finding of the hearing on a point of fact, which is pertinent to the decision of the hearing.
- A failure to adhere to the published procedure.

4.6.1 Guidance for Making Appeal

| Employee | Management |
|--|--|
| Grounds of appeal | Response to grounds of appeal |
| Case statement which should include as appropriate | Case statement which should include as appropriate |
| Introduction explaining there as ones for appealing and why they consider the action harsh or unwarranted summary of case outcome sought | Introduction, background to the case, processes followed on calling the original hearing, how the decision was arrived at, any other warnings taken into account, rationale for the decision and any mitigation taken into account summary of case recommendations |

The Board will be kept informed of all disciplinary matters and this information will be presented at the Board Meeting every quarter.

4. Special Circumstance and Exception

Any Deviation to this policy must be approved by HR. Any changes to the policy have to be approved by Legal and Compliance.

5. Non-compliance and Consequence

Employees are restricted from sharing their personal grievances with other employees or co-workers in an order to garner their support / attention or attempt to disrupt their business activities and distract them with such topics which may or may not be relevant to them. This policy is put in place for employees to submit their grievance through a proper channel. Any deviation from the set protocol by any employee or employees will be dealt with in accordance with the rules of this policy or any other such policies as appropriate by HR and management.

Grievance Reporting Form

_____ This form is to be used to file a formal grievance. All four sections must be completed and will serve as the source document for the grievance process (attach additional pages if more room is necessary). Please answer all questions fully. All supporting documentation must be attached to this grievance form at the time the grievance is filed. Additional information may be requested as necessary.

Name: _____

Status: Employee Trainee Stakeholder (Ext./Int.) Other - _____

Basis of Complaint: Harassment Discrimination Unfair Action / Violation of Rights
 Child/Forced Labor Human Trafficking Others

Grievance is filed under: Harassment and Non-Discrimination Policy
 Staff/Admin General Grievance Policy Human Rights Ethical practices related

Preferred Method to Contact You

Describe the details about Grievance.

1. What was the date of occurrence and what specific behavior, condition, or violation of policy or procedure occurred which you consider discriminatory, harassing or unfair / violated your rights?

2. How have you been adversely affected by this situation?

3. What specific action have you taken to follow the guidelines for informal resolution as outlined in the Grievance Procedures for Discrimination and Harassment or the Staff and Administrative Grievance Policy? What has been the outcome of these efforts?

4. What specific remedy do you request?

Signature: _____

Date Filed with HR: _____

6. Remediation Techniques for Grievance Mechanism.

Remediation techniques for grievance mechanisms are crucial for ensuring that conflicts and complaints are addressed effectively and fairly. Here are some techniques commonly used for grievance mechanism remediation:

- 1. Active Listening:** Train staff to actively listen to the grievant's concerns without interruption or judgment. This helps in understanding the root causes of the grievance and building trust with the individual.
- 2. Confidentiality:** Ensure that the grievance process guarantees confidentiality to protect the privacy and safety of the individuals involved. This encourages open communication and reduces fear of retaliation.
- 3. Transparency:** Maintain transparency throughout the grievance process by clearly communicating the steps involved, expected timelines, and outcomes. This fosters trust in the mechanism and increases accountability.

4. **Impartiality:** Conduct investigations and assessments impartially, without bias or favoritism. This requires having trained personnel who can objectively evaluate the evidence and make fair decisions.

5. **Documentation:** Keep detailed records of all grievance-related communications, including complaints, investigations, decisions, and follow-up actions. This helps in tracking progress, identifying patterns, and ensuring accountability.

6. **Timeliness:** Address grievances promptly and within reasonable timeframes to prevent escalation and minimize harm. Set clear deadlines for each stage of the grievance process and adhere to them as much as possible.

7. **Mediation and Negotiation:** Offer mediation or negotiation sessions facilitated by trained professionals to resolve conflicts amicably. This allows parties to express their concerns, explore potential solutions, and reach mutually acceptable agreements.

8. **Restorative Justice:** Implement restorative justice practices that focus on repairing harm and restoring relationships rather than assigning blame or punishment. This approach encourages accountability, empathy, and reconciliation.

9. **Feedback Mechanisms:** Establish feedback mechanisms to solicit input from grievant and stakeholders on their satisfaction with the grievance process and suggestions for improvement. Use this feedback to refine and enhance the mechanism over time.

10. **Training and Capacity Building:** Provide regular training and capacity-building activities for staff involved in managing grievances. This includes training on communication skills, conflict resolution techniques, cultural sensitivity, and relevant legal frameworks.

11. **Follow-Up and Monitoring:** Follow up with grievance after the resolution of their complaints to ensure their satisfaction and address any lingering issues or concerns. Additionally, monitor the effectiveness of the grievance mechanism through regular reviews and evaluations. By employing these techniques, organizations can ensure that their grievance mechanisms are robust, responsive, and capable of effectively addressing and remedying conflicts and complaints.

12. We also have NGO members to handle such grievance such as child labor force labor, etc.

13. Train the staff based on the received grievance and preventive action define post investigation. And prevent repetition.
14. Motivate the employee and external stake holder with lesson plan and story telling
15. Develop the theme and create play, explain and make them understand through play and prevent such occurrence
16. Develop different technique to develop zero grievance culture
17. Let employees to make more powerful in sharing the remedies on different type of grievance.
18. Works committee representative to explained the cases and remedies in worker or employee team as well as discuss and share in works committee.



Prepared BY
Roshan Patel-Manager-HR



Reviewed and Approved By
Harsh Patel- Sr. Manager-HR