

GRIEVANCE ROUTINES POLICY

Policy No.	Process Owner	Effective Date
SEPL/HR/005	All Functional Heads	10/04/2025

Purpose	Shaily Engineering Plastics Ltd. strives to continuously improve the quality of work life for its employees by quick identification and resolution on employee grievances.
Scope	Company premises at Shaily Engineering Plastics Ltd.

A "Grievance" is a problem, concern or complaint related to work or the work environment. A grievance can be about an act, omission, situation or decision that an ordinary person may think is unfair, discriminatory or unjustified.

SHAILY strives to continuously improve the quality of work life for its employees by quick identification and resolution on employee grievances.

The Grievance Redressal Policy (policy) attempts to achieve the following:

1. Prevent grievance from escalating;
2. Provide the employee with advice and support;
3. Maintain a healthy and stable work environment

There are documented routines on how to bring up issues and complaints regarding requirements of environment, social and working conditions related issues e.g. around discrimination, harassment or abuse.

A grievance mechanism is in place and known to workers, enabling them to raise complaints or concerns without retaliation. Complaints are recorded and acted upon, and the anonymity of workers is protected. These grievance routines are well known to all. The grievance routines include how all Workers, including contracted and sub-contracted Workers, can bring up issues and complaints directly to the Supplier.

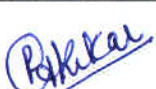

EXAMPLE OF WORKPLACE GRIEVANCES:

Bullying or Harassment

Verbal abuse (either spoken or written such as e-mails), inappropriate or threatening behaviour (Aggressive gesturing, throwing objects, hitting the table, physically touching others, carrying weapons etc.), initiate pranks, excluding or isolating employees, giving a person the majority of an unpleasant or meaningless task, humiliation through sarcasm

Discrimination

Article 14, 15 and 16 of the Constitution of India guarantee equality before law, prohibition of

Prepared By		Approved By		Revision Date
Name:	Priyanka Khutwad	Signature	Mahendra (Mike)Sanghvi	Signature
Date:	09/04/2025		10/04/2025	
				Revision No.
				R04

Policy No.	Process Owner	Effective Date
SEPL/HR/005	All Functional Heads	10/04/2025

discrimination on grounds of religion, race, caste, sex or place of birth, equality of opportunity in matters of employment in the public as well as private sector.

Sexual Harassment


- Unwelcome sexual advances, requests or demand for sexual favours, either directly or indirectly, in return for employment, promotion, examination or evaluation of a person towards any activity of TIN;
- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, indecent stares, physical contact or molestation, stalking/following, sounds, display of pictures, signs, verbal or non-verbal communication which offends the employees' sensibilities and affect her/his performance;
- Eve teasing, intimations and taunts, physical detention against one's will and likely to intrude upon one's privacy;
- Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- Conduct of such an act at work place or outside in relation to an Employee of SHAILY or vice versa during the course of employment; and
- Any unwelcome gesture by an employee having sexual implications;
- Further, SHAILY has constituted an Anti-Sexual Harassment Committee (hereinafter referred to as 'ASHC' or 'Committee' to deal with issues pertaining to sexual harassment.

GRIEVANCE MECHANISM / COMPLAINT MANAGEMENT AND RESOLUTION:

- Shaily believes in open and honest communications with all stakeholders. The Employees, Business partners, Supply chain partners etc. have a responsibility to report promptly any suspected, potential or actual concern, grievance, violation, misconduct etc.
- Complaints, minor grievances, concern etc. are immediately addressed & resolved at workplace and recorded in the register.
- Addressable / Major grievance are resolved following Grievance Routine Policy with the involvement of Committee members through proper Grievance channels.
- Complaints, Suggestions, and feedback are communicated through the grievance channels like the suggestion box, Hotline numbers, Email ID, Open door policies, Anonymous complaint process, Worker surveys etc. The Employees, Business partners, Supply chain partners etc. may directly contact the Directors at sales@shaily.com on confidential basis without fear of retaliation. Internal staff can also report through the mailbox: sales@shaily.com. The contact phone +91-7574805122 or +91 75748 05181 (extension 200).

MANNER OF ADDRESSING A GRIEVANCE:

- Any grievance other than sexual harassment under this policy should be addressed as per the Grievance Procedure in the following manner:

Prepared By		Approved By		Revision Date
Name:	Priyanka Khutwad	Signature	Signature	10/04/2025
Date:	09/04/2025	Mahendra (Mike) Sanghvi		Revision No.
		10/04/2025		R04

GRIEVANCE ROUTINES POLICY

Policy No.	Process Owner	Effective Date
SEPL/HR/005	All Functional Heads	10/04/2025

Level 1 (Approach the foreman/supervisor & decision within 48 hrs.)

The aggrieved worker in the first instance will approach the foreman and tell him of his/her grievance orally. The foreman has to redress his/her grievance and if the worker is not satisfied with this redressal, he/she can approach the supervisor.

Level 2 (Approach HOD & decision within 3 days)

The supervisor has to provide an answer within 48 hours. In the event of the supervisor not giving an answer or the answer not being acceptable to the worker, the worker goes to the next step. At this stage, the worker (either alone or accompanied by his departmental representative) approaches the Head of the Department who has to give an answer within three days.

Level 3 (Recommendations of Committee should be communicated to the HOD within seven days)

If the Departmental Head fails to give an answer or if the worker is not satisfied with his answer, the worker may appeal to the Grievance Committee.

The recommendations of this Committee should be communicated to the HOD within seven days from the date of the grievance reaching it.

Level 4 (HOD has to take a decision and inform the worker within three days)

Unanimous decisions, if any, of the committee shall be implemented by the management. If there is no unanimity, the views of the members of the Committee shall be placed before the HOD's decision. The HOD has to take a decision and inform the worker within three days.

Internal Grievance handling flow should be completed within 45 days

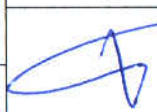
Appeal against the HOD's decision:

The worker can make an appeal against the HOD's decision. A union official may accompany the worker to the manager for discussion and if no decision is arrived at this stage, both the union and management may refer the grievance to voluntary arbitration of the receipt of the management's decision.

Grievance in case of termination/dismissal or discharge:

If the grievance is because of his/her dismissal or discharge, he can resort to the step directly and can make an appeal against dismissal or discharge. He/she can proceed as per Industrial Dispute Act/ legal arbitration.

Routine -> Contact HR Dept. OR Worker Representative / Social Performance Team Representative -> Report Grievance/misconduct verbally or written-> Issue show cause notice -> Record reply of show cause notice, Period: within 3 days -> Investigation-> Conclusion/Findings

Prepared By		Approved By		Revision Date
Name:	Priyanka Khutwad	Signature	Signature	10/04/2025
Date:	09/04/2025	Mahendra (Mike) Sanghvi		Revision No.
		10/04/2025		R04

Policy No.	Process Owner	Effective Date
SEPL/HR/005	All Functional Heads	10/04/2025



Conclusion:

Guilty->Either party -> Disciplinary action taken based on severity e.: suspension -> show cause notice -> Either party not satisfied, can proceed as per Industrial Dispute Act.


Non-Guilty->Either party -> Complaint closed -> Mutual Settlement.

SOCIAL ACCOUNTABILITY GRIEVANCE CHANNELS FOR IWAY 6.0 STANDARD (IKEA)/ RBA (RESPONSIBLE BUSINESS ALLIANCE)/ SA 8000(SOCIAL ACCOUNTABILITY)/ URSA(UNILEVER RESPONSIBLE SOURCING AUDITS)/ SMETA(SEDEX MEMBERS ETHICAL TRADE AUDIT) OR EQUIVALENT SOCIAL COMPLIANCE/CUSTOMERS' CODE OF CONDUCT & COMPLIANCE REQUIREMENTS:

- Shaily Engineering Plastics Ltd. Feedback Loops- To raise a complaint/grievance in respect to social accountability, the Employees, Business partners, Supply chain partners etc. can communicate through the grievance channels like the suggestion box, Hotline numbers, Email ID, Open door policies, Anonymous complaint process, Worker surveys etc. The Employees, Business partners, Supply chain partners etc. may directly contact the Directors at sales@shaily.com on confidential basis without fear of retaliation. Internal staff can also report through the mailbox: sales@shaily.com. The contact phone +91-7574805122 or +91 75748 05181 (extension 200).
- IKEA Feedback Loops- To raise a concern within Inter IKEA Group, under global process and local legislation.
Website: https://www.speakupfeedback.eu/web/kewe5h/in/select_language/ecc
Through
Website: <https://www.inter.ikea.com/en/how-we-do-business/ethics-and-integrity#accordion-D42C2D03-2C17-40CA-884F-1669E04782D6>
- URSA/SMETA Feedback Loops-Suppliers, their employees, workers or contractors may report actual or suspected breaches to Unilever/SMETA by phone or online. Reports can be submitted confidentially and anonymously (where permitted by law).
Website: <https://app.convercent.com/en-us/LandingPage/99b958aa-55a1-e611-80d3-000d3ab1117e>
Contact no.: 1-646-564-2238
- For SA 8000 Management system grievance -> SPT Committee /Grievance Committee -> Bureau Veritas -> Social Accountability Accreditation Services (SAAS).

Prepared By		Approved By		Revision Date
Name:	Priyanka Khutwad	Signature	Mahendra (Mike)Sanghvi	10/04/2025
Date:	09/04/2025			Revision No.
				R04

Policy No.	Process Owner	Effective Date
SEPL/HR/005	All Functional Heads	10/04/2025

Contact Information		
		
BV Local Office: BUREAU VERITAS (INDIA) PVT. LTD 419 - 424, 4 th floor, Lotus Elite, Beside Osia Mall, Gotri Sevashi Road, Baroda -391101, India Telephone : +91 265 2325052 , Fax : +91 265 2313136	Managing Office: BUREAU VERITAS (INDIA) PVT. LTD 72 Business Park, Marol Industrial Area, MIDC Cross Road 'C', Andheri (East), Mumbai - 400 093, Maharashtra, India Board : +91 22- 62742000 / 01/ 02 Fax : +91 22 - 62742008	Accreditation Body: SOCIAL ACCOUNTABILITY ACCREDITATION SERVICES (SAAS) 15 West 44th Street, 6th Floor New York, NY 10036 Tel: (212) 391-2106 Fax: (212) 684-1515
Email: cersa8000clientfeedback.in@in.bureauveritas.com		

- RBA Feedback Loops–Appeal Mechanism for RBA system grievance -> The RBA VAP Ops Manual is the guiding document for all VAP decisions. If the auditor, the QM and the APM agree, then the finding stands. Only in the case of the Ops Manual being silent on an issue, or unclear, the auditee is able to escalate. -> Escalation will be evaluated by a committee chaired by the Chief Operating Officer at the RBA, the mechanism will rely on expert guidance through regulatory, industry standards, legal frameworks and industry best practice. -> RBA provides an official response to requester, regardless of decision, in some cases, more information is requested.
Link to RBA Appeal mechanism: VAP Appeal mechanism submission form Survey (surveymonkey.com) i.e. <https://www.surveymonkey.com/r/RBAVGM>
- Other equivalent/applicable Customers/Business partners Feedback Loops- To raise a complaint/grievance in respect to social accountability, the Employees, Business partners, Supply chain partners etc. can communicate through their official website, Hotline numbers, Email ID etc.

Revision History:



R00: New Release

R01: Release in new format for policy

R02: Reviewed and Revised as per the guidelines and suggestion during Audit.

R03: Revised as per the guidelines and suggestion during external Audit, Social Accountability Grievance Channels added.

R04: Greivance channel internal contact number details revised.

Prepared By		Approved By		Revision Date
Name:	Priyanka Khutwad	Signature	Mahendra (Mike)Sanghvi	10/04/2025
Date:	09/04/2025			Revision No.
				R04