



## **STAKEHOLDERS GRIEVANCE REDRESSAL POLICY**

<b>Policy Adoption / Change Effective Date</b>	<b>Board / Committee Approval Date</b>	<b>Version of Policy</b>
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Corporate Identity Number: L24100GJ2007PLC051093

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### INTRODUCTION

The purpose of the Stakeholders Grievance Redressal Policy is to formalize the management of grievances of our stakeholders to minimize the social risks to the business. The grievance process, outlined in this document, provides an avenue for stakeholders to voice their concerns and offers transparency on how grievances will be managed by the Company internally. It also aims to reduce conflict and strengthen relationships between the Company and all stakeholders.

### APPLICABILITY:

The principles set forth in this policy are applicable to all internal & external stakeholders of our operations, associates and business partners across **ACUTAAS CHEMICALS LIMITED** and its affiliates. It is therefore, the responsibility of all internal and external stakeholders to follow and adhere to all elements described in the policy.

### 1. DEFINITIONS:

**Grievance** : An issue, concern, problem, or claim that an individual or community group wants addressed by the Company in a formal manner. It also includes any complaints received regarding discrimination on the grounds of disability from a person under Rights of Person with Disabilities Act, 2016.

**Grievance Handling Mechanism** : A way to accept assesses and resolve complaints concerning the performance or behavior of the Company, its contractors, employees and other stakeholders.

**Internal Stakeholders** : Groups or individuals within a business who work directly within the business, such as employees and contractors.

**External Stakeholders** : Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, vendors, community, NGOs, shareholders and the Government Authorities.

### 2. GRIEVANCE REDRESSAL PROCESS : INTERNAL STAKEHOLDERS

A Senior HR Officer will be designated by the Chairman of the Company as Internal Grievance Officer who will hear out the grievances of stakeholders and record them. The Grievance Redressal Committee (“Committee”) will be responsible for addressing all the grievances submitted by the Internal Stakeholders Grievance Officer. If the concerned employee is not satisfied by the decision of the Committee, the committee will refer such cases to the Chairman of the Company and the Chairman shall address the grievance in such cases.

#### **Level-1.**

At the first instance the affected internal stakeholder should submit the grievance (in writing) stating his/her name, designation, employee number, other personal details and grievance to his / her immediate supervisor or Head of Department (“HOD”) or HR Manager. The supervisor or HOD or HR Manager should acknowledge the receipt of the grievance, if possible immediately. The supervisor or

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HOD or HR Manager should redress the grievance within a period of five working days. In case the affected internal stakeholder is not satisfied with the outcome, it will escalate Internal Stakeholder Employees Grievance Officer, who shall assess whether the grievance is genuine or not and accordingly take further necessary action within a period of five working days. If the grievance relates to any policy matter, the grievance shall be closed in consultation with HR Head.

### **Level-2**

If the concerned internal stakeholder is not satisfied with the response from the Grievance Officer he/she can submit the grievance along with the reply to the Unit Grievance Committee (UGC). The UGC would hear out the grievances of individual and redress or counsel them. Acknowledgement of the receipt of the grievance will be issued to the concerned internal stakeholder. The Unit Grievance Committee should redress the grievance within a period of 7 working days.

### **Level-3**

If the grievance still persists, a formal grievance would be lodged and forwarded to the Central Grievances Committee (CGC). Central Grievance Committee comprising of one Functional Director, one HR Department representative and the Company Secretary will meet to assess the situation and the grievance. Based on a careful analysis of the grievance in the light of feedback and views of the members of the committee, the CGC would make its recommendation within a period of fifteen working days and send it to the Chairman for consideration and appropriate action, if any. The decision of the Chairman of the company shall be final and binding on the concerned employee. The entire process of grievance redressal should be completed within and not more than 45 working days.

## **3. REPORTING**

The Unit Grievance Committee and Central Grievances Committee will report to the Chairman of the Company. A quarterly / half yearly written report of grievances handled will be submitted to the Chairman of the Company.

## **4. GUIDELINES AND CONDITIONS**

- i. The internal stakeholder shall submit his / her grievance immediately and in any case within a period of one month from the date of occurrence.
- ii. If the grievance arises out of an order issued by the management, initially the said order shall be complied with and thereafter the concerned employee submits his grievance as per the procedure laid down in this policy document.
- iii. Grievance pertaining to or arising out of the following shall not come under the purview of the grievance procedure: -
  - Matters related to collective disputes/bargaining such as salary, allowances, hour of work and other benefits and also cases related to disciplinary procedures.
  - Annual performance appraisal /confidential report.
  - Where the grievance does not relate to internal stakeholder.
  - Any grievance arising out of removal or dismissal of an employee.
  - Any complaint related to sexual harassment at workplace will be considered by Internal Complaints Committee.

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- Any matter pertaining to the period before the date of joining of Company and or initial appointment/absorption in the company.
- Grievances pertaining to or arising out of disciplinary action or appeal against such action shall be channeled to the Competent Authority as laid down under the Code of Conduct of the Company and in such cases the grievances redressal procedure shall not apply.
- Any other matter as may be decided with the approval of the Chairman.

### 5. GRIEVANCE REDRESSAL PROCESS: EXTERNAL STAKEHOLDERS

A Stakeholders Grievance Officer shall be deputed to look into the grievances of all external stakeholders. Following procedure shall be followed to redress stakeholders grievances.

#### I. Receive Grievance

The Stakeholder Grievance officer receives all grievances that come through email / post. The stakeholder Grievance officer will review the grievance form and process the grievance in accordance to this procedure.

#### II. Record

All formal grievances will be logged in the Grievance Register and Grievance Lodgment Forms will be saved in record of correspondence.

#### III. Screen

The stakeholder grievance officer is responsible to liaise with the external stakeholder/s and work on a resolution. Grievances will be screened depending on the level of severity in order to determine and how the grievance is approached. See below table categorizing the different levels:

Category	Description	Grievance Owner
Level 1	When an answer can be provided immediately and/or company is already working on a resolution (only formal grievances to be lodged in the External Grievance Register).	Head of concerned Department / External Stakeholder Grievance Officer
Level 2	One off grievances that will not affect the reputation of Company.	External Grievance Officer
Level 3	Repeated, extensive and serious grievances that may jeopardize the reputation of Company.	Central Grievance committee

#### IV. Acknowledge

A grievance will be acknowledged, by the grievance officer, within five working days of a grievance being submitted. Communication will be made either verbally or in written form. The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

#### V. Investigate

The External Stakeholder Grievance Officer along with the concerned department's head of department is responsible for investigating the grievance. The investigation may require the team

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to make site visits, consult employees, contact external stakeholders and complete other activities. Records of meetings, discussions and activities all need to be recorded during the investigation. Information gathered during the investigation will be analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

### VI. **Act**

Following the investigation, the External Stakeholder Grievance Officer will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The grievance officer is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the team feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

### VII. **Follow up and close out**

The External Stakeholder Grievance officer will make contact with the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder, the stakeholder officer will verify that the outcome was satisfied and also gather any feedback on the grievance process.

## 6. **APPEAL**

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the External Stakeholder Grievance Officer needs to escalate the matter to the Central Grievance Committee. The committee will review the grievance and all documentation gathered throughout the investigation and determines whether further actions are required to resolve the grievance. Company is fully committed to resolving an external stakeholder's grievance so if Company is unable to resolve a complaint or a stakeholder is unhappy with the outcome, Company may seek advice from other independent parties.

## 7. **GRIEVANCE REPORTING CHANNELS**

Acutaas Chemicals will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Key channel for external stakeholders to vocalize their grievance can be done in following way:

### **External Stakeholders Grievance Officer**

Name : Ekta Srivastava

Designation : Company Secretary

Email : [investorinfo@acutaas.com](mailto:investorinfo@acutaas.com) Phone No. : 7227977744

### **Internal Stakeholders Grievance Officer**

Name : Payal Gajjar

Designation : Manager HR

Email : [payal.gajjar@acutaas.com](mailto:payal.gajjar@acutaas.com) Phone No. : 7573015366

## 8. **AMENDMENT OF THE POLICY**

Company shall review and update the policies and procedures based on annual assessment, the learning and any changes in relevant laws and regulations.

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### Annexure A – Grievance Lodgment Form

**Name:** \_\_\_\_\_

**Company (if applicable):** \_\_\_\_\_

**Whether Internal or External Stakeholder :** \_\_\_\_\_

**Category : Employee / Consultant / Contractor / Vendor / Client / NGO / Authorities / Communities/ Others**  
(Tick mark appropriate)

**Date:**

**Time:**

**Preferred Contact Method:**

Telephone / Email /Correspondence

Please provide contact details:

\_\_\_\_\_

**Supporting Documents Attached?**

Yes \_\_\_\_\_ No \_\_\_\_\_ (Tick Mark)

**Please provide details of your grievance**

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**What outcome are you seeking?**

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**Additional Information**

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