Steel Strips Wheels Limited

GRIEVANCE MECHANISM POLICY

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1. Purpose

Steel Strips Wheels Limited ("SSWL") is committed to providing a respectful, safe and fair workplace where concerns can be raised and resolved without fear. This Grievance Mechanism Policy ("Policy") defines SSWL's grievance channels and handling process for employees and contract workers engaged at SSWL sites. It also includes a clear Non-Retaliation commitment and protection framework.

This Policy supports evidence expectations under EcoVadis (Labour & Human Rights and Ethics themes) by establishing an accessible reporting mechanism, predictable resolution timelines, confidentiality controls and non-retaliation safeguards.

2. Scope and Applicability

This Policy applies to all SSWL employees, including permanent, fixed-term and trainees/apprentices (as applicable). It also applies to contract workers engaged through third-party contractors while working on SSWL premises, and sets expectations for contractors to communicate and enable access to this mechanism.

This Policy is intended for workplace-related grievances, including labour and human rights, working conditions, and management conduct. For concerns involving fraud/corruption or serious ethical misconduct, the Company's Whistleblowing/Vigil Mechanism channel may be used in addition to, or instead of, this grievance mechanism.

3. Definitions

For the purpose of this Policy:

- Grievance: Any concern, complaint or dissatisfaction related to workplace practices, employment/working conditions, treatment, behaviour, health and safety, wage/payment issues, discrimination or harassment (excluding POSH matters handled under POSH procedure), or other workplace rights concerns.
- Complainant: The employee/worker raising a grievance in good faith.
- Respondent/Subject: The person(s) against whom the grievance is raised.
- Grievance Officer: The designated HR/Compliance representative responsible for intake, coordination and closure of grievances.

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- Grievance Committee: A committee constituted to review/investigate complex grievances and recommend remedies and corrective actions.
- Retaliation: Any adverse action against a complainant or witness due to reporting in good faith (e.g., threats, harassment, demotion, dismissal, wage withholding, coercion, denial of overtime, blacklisting).

4. Guiding Principles

SSWL's grievance mechanism is designed to be:

- Accessible: Available to employees and contract workers with multiple reporting channels and language support where practicable.
- Predictable: Clear process steps and timelines with periodic status updates.
- Confidential: Information shared strictly on a need-to-know basis with privacy safeguards.
- Fair and equitable: Grievances are handled impartially, with opportunity for all parties to be heard.
- Rights-compatible: Outcomes seek to prevent harm, provide remedy and support safe working conditions.
- Non-retaliatory: Protection for complainants and witnesses raising concerns in good faith.
- Continuously improving: Trends are analysed to strengthen systems and prevent recurrence.

5. What Can Be Reported

Examples of grievances covered by this Policy include (not exhaustive):

- Wage and benefits issues (incorrect payment, delays, unlawful deductions, statutory contribution concerns).
- Working hours, overtime, rest breaks, weekly off, shift scheduling concerns.
- Unsafe working conditions, PPE availability, near-miss reporting, unsafe supervision.
- Discrimination, bullying, intimidation, or abusive behaviour (non-POSH).
- Freedom of association concerns or interference with lawful worker representation.
- Contractor-related issues affecting contract workers on SSWL premises (wages, working time, basic facilities).
- Accommodation, transport, canteen/welfare facilities issues (where provided).
- Any coercion, forced labour indicators, identity document retention, or restriction on movement (immediate escalation required).

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Matters under the Prevention of Sexual Harassment (POSH) Act shall be handled through the Internal Committee as per the POSH Policy and applicable legal procedure. Grievances involving criminal conduct may be referred to appropriate authorities as required by law.

6. Grievance Channels (Employees + Contract Workers)

SSWL provides multiple channels to ensure grievances can be raised safely and conveniently. Complainants may choose any channel listed below. Anonymous reporting is permitted; however, providing contact details may support faster resolution.

6.1 Internal Channels (Recommended First-Line)

- Immediate supervisor / line manager (where safe and appropriate).
- Plant HR / HR Business Partner / Time Office / Welfare Officer.
- Grievance Officer (designated HR/Compliance focal point).

6.2 Contract Workers (Special Access)

Contract workers may report grievances through their contractor supervisor, but they also have the right to report directly to SSWL using any of the channels above. SSWL will not require contract workers to report only through the contractor.

7. Process and Timelines

SSWL follows a structured grievance handling process:

1. Step 1 – Receipt and Registration: Grievance is received and logged with a unique reference number.
2. Step 2 – Acknowledgement: Acknowledgement to complainant (where contact details are available).
3. Step 3 – Screening and Assignment: Categorisation (routine/complex/critical) and assignment to responsible owner/investigator.
4. Step 4 – Fact-finding/Investigation: Collection of information, interviews, review of records, and consultation with relevant functions.
5. Step 5 – Resolution and Remedy: Decision on corrective actions/remedy; communication to complainant (as appropriate).
6. Step 6 – Closure and Feedback: Closure note, evidence retention, and optional feedback from complainant.

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7. Step 7 – Prevent Recurrence: CAPA and trend analysis for systemic improvements.

7.1 Standard Timelines

Stage	Target Timeline	Notes
Acknowledgement	Within 2 working days	If contact details are available
Initial screening & assignment	Within 5 working days	Critical matters may be escalated immediately
Resolution (routine cases)	Within 15 working days	May vary by site/complexity
Resolution (complex cases)	Within 30 working days	Interim updates at least every 10 working days
Closure communication	Within 5 working days after decision	Subject to confidentiality and legal constraints

Where timelines cannot be met due to complexity, SSWL will provide periodic status updates and revised expected closure dates.

8. Confidentiality and Data Privacy

SSWL will handle grievances with discretion. Information will be shared strictly on a need-to-know basis with those responsible for assessing, investigating or resolving the grievance. Personal data will be collected and processed only for legitimate purposes related to grievance handling, retained for defined periods, and protected through access controls.

Anonymous grievances will be accepted. Where the grievance is anonymous, SSWL will evaluate available information and proceed to the extent feasible.

9. Non-Retaliation and Protection

SSWL strictly prohibits retaliation against any employee or contract worker who raises a concern in good faith or participates in an investigation as a witness. Retaliation includes but is not limited to termination, demotion, wage withholding, transfer to undesirable roles, denial of overtime/benefits, threats, harassment, or blacklisting.

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Any retaliation allegation will be treated as a serious matter and investigated promptly. Confirmed retaliation may result in disciplinary action, up to and including termination of employment/contract and legal action where appropriate.

Interim protection measures may be provided where necessary to prevent harm during investigation (e.g., changes in reporting lines, temporary reassignment, leave support, enhanced supervision).

10. Investigation, Remedy and Corrective Actions

SSWL will investigate grievances impartially and in a manner proportionate to the risk and severity. Investigations may be conducted by HR, EHS, Compliance, or an appointed committee depending on the topic.

10.1 Remedy and Corrective Actions

Where a grievance is substantiated, SSWL will seek to provide appropriate remedy and corrective actions, which may include: correction of payroll errors and back-pay, restoration of leave/weekly off, disciplinary action, training/coaching, process changes, contractor corrective actions, safety improvements, or other measures to prevent recurrence.

10.2 Communication of Outcomes

SSWL will communicate outcomes to the complainant as appropriate, while protecting confidentiality and privacy rights. Some details may be limited where required by law or to protect involved parties.

11. Escalation and Appeals

If a complainant is not satisfied with the handling or outcome, they may escalate the grievance to the next level: Plant HR Head → Corporate HR Head/Grievance Officer → designated senior management or committee (as applicable). Escalation requests should preferably be submitted within 10 working days of closure communication.

Critical grievances (forced labour indicators, serious safety risks, severe harassment/violence, major wage denial) must be escalated immediately to Plant Head, HR Head and EHS/Compliance as applicable for urgent action.

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12. Communication, Awareness and Accessibility

SSWL will communicate this grievance mechanism to employees and contract workers through inductions, trainings, posters/noticeboards and contractor briefings. Information will be made available in languages commonly understood at the site where practicable.

Contractors must display grievance mechanism information for their workers working at SSWL sites and ensure workers can access SSWL channels without obstruction.

13. Recordkeeping, Monitoring and Reporting

SSWL will maintain records of grievances, investigations, outcomes and corrective actions. Records will be retained for a defined period in line with legal and audit requirements.

SSWL will monitor grievance mechanism effectiveness through indicators such as:

- Number and types of grievances received (employee and contract worker).
- Closure rate and average resolution time.
- Recurrence of similar grievances and root causes.
- Retaliation allegations and outcomes.
- Awareness/training coverage and accessibility improvements.

14. Policy Breach and Disciplinary Action

Misuse of this mechanism through knowingly false, malicious or frivolous complaints may result in action as per Company procedures. However, a grievance made in good faith that is not substantiated will not result in adverse action against the complainant.

15. Review and Updates

This Policy will be reviewed at least in two years or earlier if required due to legal changes, audit findings, significant incidents, or stakeholder expectations.

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Annexure A – Grievance Submission Form

This form can be used by employees and contract workers (or equivalent digital submission).

Grievance Reference No.	(To be assigned by HR/Grievance Officer)
Date of Submission	
Name (optional for anonymous)	
Employee/Worker Type	Employee / Contract Worker
Employee ID / Contractor & Worker ID (if applicable)	
Department / Function	
Site / Location	
Contact Details (phone/email) (optional)	
Type of Grievance	Wages/Benefits | Working Hours | Safety | Behaviour/Harassment | Discrimination | Contractor Issue | Other
Description of Concern (what happened, when, where)	
Persons Involved (if any)	
Preferred Outcome/Remedy (if any)	

Declaration (optional): I confirm that the information provided is true to the best of my knowledge and is raised in good faith.

Annexure C – Non-Retaliation Statement (Standalone)

SSWL is committed to a speak-up culture. Any employee or contract worker may raise concerns in good faith—about wages, working hours, safety, misconduct or other workplace issues—without fear of retaliation.

Retaliation is strictly prohibited. Retaliation includes any adverse action such as threats, harassment, intimidation, dismissal, demotion, wage withholding, denial of overtime/benefits, unfair transfers, or blacklisting because a concern was raised or because someone cooperated in an investigation.

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Anyone who believes they have experienced retaliation should report it immediately through the grievance channels or the whistleblowing/ethics channel. Confirmed retaliation will result in disciplinary action and may include termination and legal action.

Prepared By:	Approved By:
Lead PM & Strategy	General Manager-P&IS

** End of Document**

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