



Grievance Handling **& PoSH Training Policy**



**Grievance Handling
& PoSH Training Policy**

1. INTRODUCTION

Although we at **LSKB Aluminium Foils Private Limited** (herein referred as “**The Company**”) seek to provide a workplace in which all employees feel that they are an important part of our organization and where employees feel fairly treated, there may be times when an employee have a dispute with a supervisor or the Company which can best be resolved through a formal procedure for dispute resolution. All disputes between any employee and the Company are to be resolved by in accordance with the following procedure.

Note: The Company reserves the right to modify this Policy at any time and nothing in this Policy should be construed to constitute a contract between employee and the Company or to constitute any part of a contract between you and the Company.

2. POSH TRAINING

All employees, regardless of their position or level within the company, are required to undergo POSH training. The training shall provide employees with a clear understanding of what constitutes sexual harassment, its impact on individuals and the workplace, and their responsibilities in preventing and reporting such incidents.

POSH training shall be conducted at regular intervals, as determined by the company, to ensure ongoing awareness and compliance. Initial training will be provided upon an employee's onboarding, and subsequent refresher training sessions shall be conducted periodically.

All employees shall be educated on the company's reporting and complaint procedures, emphasizing the importance of promptly reporting incidents of sexual harassment. This POSH training will clearly outline multiple reporting channels, including supervisors, human resources, designated POSH officers, or an anonymous reporting mechanism or Internal Committee established by the Company.

Policy Awareness Training to be provided to ensure coverage of 100% of all stakeholders including all employees till 2030.

3. DEFINITION

A grievance is any discontent or dissatisfaction, whether expressed or not, whether valid or not, arising out of anything connected with the company that an employee/staff thinks, believes, or even feels, is unfair, unjust, or inequitable. Once communicated, a grievance may be termed as a **complaint**.

A grievance can relate to almost any aspect of employment, for example:

- Safety in the workplace
- Staff development or training
- Rosters or hours of work



**Grievance Handling
& PoSH Training Policy**

- Performance appraisal
- Lack of transparency in Communication
- Unethical practice or behavior
- Leave allocation
- Salary and other Entitlements
- Non-Retaliation and Just-Resolution
- Workplace harassment
- Health and safety
- Supervisor behavior
- Adverse changes in employment conditions

Above mentioned list in not exhaustive. However, employees should try to resolve less important issues informally before they resort to a formal grievance. A grievance or complaint can be filed verbally and in writing (letter, fax, e-mail, Drop box, etc). The company strongly discourages grievances published on public forums (such as Facebook, Twitter, etc). These complaints might not be considered valid unless they are followed by an official filing (in the way mentioned earlier) of the complaint.

The Company shall consider following points while addressing Grievance Handling:

1. The Company shall encourage all employees / staff to express their grievances freely and frankly and guarantees that no complainant shall be victimized or discriminated against in the follow up of his/her reported complaints.
2. The Company shall endeavor to provide a satisfactory closure to all reported grievances in a period which is reasonable and justifiable. However, **one-month upper limit** shall apply for closure of all reported grievances (from the date of receipt of complaint).
3. **Informal complaint & Informal resolution** (of complaint) are those complaints and resolutions, where the communicated verbally and settled to complainant’s satisfaction. No records are required in this category.
4. **Formal complaints & Formal resolution** are complaints which are communicated in writing and resolved. These are recorded in ‘**Staff Grievance Register** ‘(SGR) maintained for the purpose at HRD desk at all offices.
5. **Complaint Drop-Boxes (CDBs)** are provided at locations convenient to staff. These drop boxes should be under lock and key protection and as far as possible, located in an area free from any form of surveillance. The **CDB’s** shall be opened at least once every calendar week in presence of HR or HRD representative and **complaint notes** retrieved.



LSKB Aluminium Foils Pvt. Ltd.

Doc. No.: POL-LSKB-HR-09

Rev. No.: 00

**Grievance Handling
& PoSH Training Policy**

Effect. Date: 01-06-2024

6. **Complaint Notes (CN's)** is the term used for papers deposited in & collected from Complaint Drop-Boxes carrying written complaint information. Upon weekly retrieval of these **CN's**, Grievances noted on these 'Complaint Notes' shall be transferred to the Staff Grievance Register in the presence of HRD representatives. There is no requirement to preserve these **CN's** and they shall be discarded once grievance is copied into the 'Staff Grievance Register'.

4. TYPES OF GRIEVANCES

1. Anonymous communication

Anonymous communication, in which identity of complainant is not known (e.g.-complaint notes dropped in Complaint Drop-Boxes provided. Complaints dropped in these drop boxes are to be considered formal complaints and require formal resolutions.

Anonymous complaints cannot be resolved through informal & open discussions (informal resolution) as the complainant's identity is not known. The company will also not be able to contact the complainant directly on what action it has initiated to address the complaint. **Anonymous grievances (complaints)** shall be recorded in the Staff Grievance Register (SGR) and followed up with closure of recorded issues.

2. Identity known communication

The identity of the complainant is known. The company prefers this method (**Identity known communication**) as it facilitates open, informal, and honest discussions between all involved parties and allows **informal resolution**. It is hoped that in most cases, misunderstandings or grievances can be resolved through informal discussions (on issues concerning concern) between aggrieved staff, HRD and Senior Management.

Issues or grievances which are settled to the satisfaction of the aggrieved employee/staff through **Informal resolution** need not be recorded. However, an informally reported and resolved grievance may also be recorded in the **Staff Grievance Register** maintained by Company for such purpose and subsequent follow up till closure of recorded issues.

5. GRIEVANCE HANDLING PROCEDURE

All grievances received (written), shall be treated as important and every effort shall be made to resolve and close the grievances. Informal resolutions shall be preferred whenever possible. Grievances received in writing be entered in the Company after receipt of a complaint. The complaint will be entered in the Company within 7 calendar days after receiving it.

The complaint shall be dealt with by the HR department within a reasonable time period and it reserves the right to consult any party it deems necessary to address the complaint. The HR department will reply with its resolution in writing for a formal complaint. It will rely verbally for an informal complaint.



**Grievance Handling
& PoSH Training Policy**

Preliminary Step

You must first address your grievance with your immediate supervisor. This may be done orally in informal discussion. If your informal attempts to resolve the matter are not successful, you may implement the formal grievance process.

Step 1

You must first submit your grievance in writing to your immediate supervisor. Grievances must be submitted within 15 calendar days following the date you first knew or should have known of the grievance. If you do not submit the grievance within the 15-day period, you waive your right to assert it.

Your supervisor will respond in writing within ten (10) days following receipt of your grievance. All grievances and replies in Step 1 must be in writing. If the grievance is not settled in Step 1, then you may proceed to Step 2.

Step 2

Within ten (10) days following your receipt of the written answer to your Step 1 grievance from your supervisor, you may appeal the disposition of your grievance by your supervisor to HR. The HR Head will then undertake an investigation of your grievance and the underlying facts. Within 10 business days following receipt of your grievance the HR Head will meet with you in person to discuss your grievance. The HR Head will then provide a written response to your grievance within 10 business days following the date of your meeting.

Step 3

If you are not satisfied with the response of the HR Head at Step 2, you may submit your grievance to the Director of the Company or the Director's designee for review within five (5) days following receipt of the written response from your HR Head. The Director or his designee will review the grievance and provide a written response within 15 business days following receipt of the Step 3 grievance.

The grievant bears the burden of proof as to the validity of the grievance. Employees who face allegation have the right to:

- Receive a copy of the allegations against them
- Respond to the allegations
- Appeal on any formal decision



**Grievance Handling
& PoSH Training Policy**

The company is obliged to:

- Have a formal grievance procedure in place
- Communicate the procedure
- Investigate all grievances promptly
- Treat all employees who file grievances equally
- Preserve confidentiality at any stage of the process
- Resolve all grievances when possible
- Respect its no-retaliation policy when employees file grievances with the company or external agencies.

The decision of the Director shall be in writing and the decision will be deemed final and binding. Henceforth, you waive your right to bring any action in court.

6. GRIEVANCE REDRESSAL COMMITTEE

The Grievance Redressal Committee shall consist of equal number of members from the employer and the workmen. The chairperson of the Grievance Redressal Committee shall be selected from the employer and from among the workmen alternatively on a rotation basis every year.

Members

Maximum 6 (six) persons of which 3 (three) should be workers'/employees' representatives and 3 (three) should be from the management side or persons having managerial rights.

This policy comes in force from the date of approval and shall supersede any such policy or content available before this date in any form.

This policy and its contents shall be reviewed every three years from the date of approval or immediately in the event of any trigger necessitating its review before the scheduled review date.