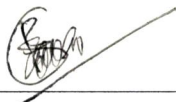


Policy name- Grievance redressal and disciplinary action policy  
 Version number – SIL/2025/08.007  
 Approval Date- 15/10/2025  
 Revision Date- 02/05/2026  
 Policy Effective Date-01/11/2025

| <b><u>Prepared &amp; Verified</u></b>                                             | <b><u>Approval L1</u></b>                                                           |
|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|
| Priyadarshini KR<br>SGM- HCM                                                      | Giridhar Kumar<br>COO                                                               |
|  |  |

### **GRIEVANCE REDRESSAL POLICY**

#### **1. PURPOSE**

Sumadhura recognizes that from time to time employees may wish to seek redress for grievances relating to their employment or in case of any corporate compliance breach. This policy aims to clarify the procedures governing the policy and all other necessary information that an aggrieved employee may follow to seek redressal. This policy is also aimed at clarifying the point of contact for such grievance redressal.

#### **2. SCOPE**

This policy is applicable to all Sumadhura employees, contractors, interns, consultants and third-party vendors who represent Sumadhura.

#### **3. GRIEVANCE REDRESSAL COMMITTEE**

- Grievance Redressal Committee is an independent body of three members formed as a first point of contact to investigate any complaints related to breach of corporate policies and regulatory compliances.
- The HCM HEAD is responsible for monitoring the implementation of this Procedure and ensuring that it reflects any changes in code of practice or relevant legislation.
- If an employee believes they have been subjected to any action they regard as unfair or have a problem affecting their work performance the Grievance Procedure should be followed.
- Grievances relating to employment, whether of a general or specific nature should not be expressed to clients, suppliers etc. but should be taken up through this process.
- All complaints must be written and must be sent to [grievances@sumadhuragroup.com](mailto:grievances@sumadhuragroup.com)
- Please follow the complaint registration template that is appended at the end of this document.

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#### 4. MEMBERS OF GRIEVANCE REDRESSAL COMMITTEE

The HCM head forms the Grievance Redressal Committee within 7 working days from receiving of the complaint based on the nature of the complaint and the department from which the complaint arises. The grievance redressal committee will be a cross functional team with appointed members from all the departments of the organization.

#### 5. GRIEVANCE REDRESSAL

##### 5a. Grievance procedure

- The employee sends an email in the stated template to [grievances@sumadhuragroup.com](mailto:grievances@sumadhuragroup.com)
- The HCM head reviews the nature of the complaint and reverts with an acknowledgement of the complaint within 3 working days.
- The HCM head forms a cross functional committee within 7 working days of receipt of the complaint to address the complaint.
- The Committee shall hold a meeting with the Complainant, if required, within 15 days of the receipt of the complaint, but no later than 21 days in any case.
- During this meeting:
  - The Complainant presents their concerns and supporting material (documents, written/oral statements, etc.).
  - If the Complainant feels uncomfortable presenting details personally, they may nominate a Committee member of their choice to assist.
  - The statement is documented and signed by both the Complainant and Committee members present to ensure authenticity.
- The concerned person against whom the grievance is raised (Respondent) is invited for a fair hearing.
- The Respondent is given an opportunity to present their side and provide any evidence.
- Both parties are treated with dignity, and the process follows the principles of natural justice (equal opportunity, impartiality, transparency).
- Based on the hearings and evidence, the Committee conducts an enquiry and deliberates on possible resolutions.
- The Committee records its findings and recommendations in writing.
- Possible outcomes:
  - Valid grievance: Committee suggests corrective/disciplinary or preventive action.
  - Invalid grievance: Complaint is closed with reasons documented.
  - Malicious/false complaint: If proven, the Complainant may be subject to appropriate disciplinary action.

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- The final decision and recommended actions are communicated in writing to both the Complainant and the Respondent within a reasonable timeframe.
- The implementation of the decision is monitored by HCM Head.

#### 5b. Exclusions From Grievance Redressal Procedure

- If the complaint pertains to the general level of wages, wage patterns, fringe benefits or other broad areas of financial management and personnel policies, it is not an issue to be processed under this grievance policy and is deemed not to be a grievance issue.
- A decision given at the conclusion of the disciplinary procedure of the company or decisions regarding redundancy of an employee given on account of commercial /business reasons are excluded from the purview of the grievance procedure.
- A sexual harassment/other harassment that falls within the purview of the Prevention of Sexual Harassment against Women, should be taken up through the Internal Complaints Committee constituted as per Law in the first instance itself.

#### 5c. Misconducts

| Category                 | Misconduct Type | Examples                                                                                     |
|--------------------------|-----------------|----------------------------------------------------------------------------------------------|
| Attendance & Timekeeping | Minor           | Violation of attendance rules                                                                |
| Attendance & Timekeeping | Minor           | Late coming without prior permission or valid excuse, particularly if it delays others' work |
| Attendance & Timekeeping | Minor           | Leaving the workplace and returning during work hours without permission                     |
| Attendance & Timekeeping | Minor           | Obtaining or attempting to obtain leave of absence on false pretext                          |
| Attendance & Timekeeping | Minor           | Falsifying the attendance register                                                           |
| Workplace Conduct        | Minor           | Reading extraneous material while on duty                                                    |
| Workplace Conduct        | Minor           | Engaging in private or personal work during working hours                                    |
| Workplace Conduct        | Minor           | Quarrelling with colleagues or causing disorder in the workplace, without using force        |
| Workplace Conduct        | Minor           | Abusing within company premises                                                              |

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|                                      |       |                                                                                               |
|--------------------------------------|-------|-----------------------------------------------------------------------------------------------|
| Use of Resources                     | Minor | Excessive use of telephone/mobile for personal calls during duty without approval             |
| Use of Resources                     | Minor | Unauthorized use of office stationery for personal purposes                                   |
| Use of Resources                     | Minor | Unauthorized use of company's vehicle/property for personal purposes                          |
| Use of Resources                     | Minor | Allowing unauthorized persons to operate company equipment or vehicles without permission     |
| Appearance & Discipline              | Minor | Indecent attire or untidy appearance                                                          |
| Appearance & Discipline              | Minor | Trespassing into restricted sections/functions                                                |
| Appearance & Discipline              | Minor | Failure to achieve service and delivery norms published by the company                        |
| Attendance & Unauthorized Activities | Gross | Unauthorized absence from duty                                                                |
| Attendance & Unauthorized Activities | Gross | Engaging in private trade/employment without written permission of the CMD/Board of Directors |
| Attendance & Unauthorized Activities | Gross | Willful slowing down of work or turning out unsatisfactory work                               |
| Attendance & Unauthorized Activities | Gross | Repeated minor misconducts despite written warnings                                           |
| Insubordination & Negligence         | Gross | Willful insubordination or disobedience of lawful instructions                                |
| Insubordination & Negligence         | Gross | Negligence, carelessness, or unsafe acts causing injury, damage, or financial loss            |
| Insubordination & Negligence         | Gross | Consistent failure to achieve productivity norms                                              |
| Insubordination & Negligence         | Gross | Refusal to carry out assigned duties                                                          |
| Fraud, Theft & Dishonesty            | Gross | Theft, misappropriation, fraud, dishonesty involving company property or others' property     |

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*Priya Dasgupta*

*[Signature]*

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|                                     |       |                                                                                              |
|-------------------------------------|-------|----------------------------------------------------------------------------------------------|
| Fraud, Theft & Dishonesty           | Gross | Forgery, falsification, or tampering with records/documents                                  |
| Fraud, Theft & Dishonesty           | Gross | Giving false information at joining or thereafter                                            |
| Fraud, Theft & Dishonesty           | Gross | Withholding or misreporting critical information                                             |
| Fraud, Theft & Dishonesty           | Gross | Securing undue advantage by misrepresentation                                                |
| Fraud, Theft & Dishonesty           | Gross | Failure to report known theft/fraud within the company                                       |
| Corruption & Bribery                | Gross | Accepting or giving bribes, illegal gratification, or unauthorized gifts                     |
| Corruption & Bribery                | Gross | Abuse of authority for personal benefit                                                      |
| Workplace Behavior & Harassment     | Gross | Quarrelling with force/violence                                                              |
| Workplace Behavior & Harassment     | Gross | Physical or verbal attack on colleagues or superiors                                         |
| Workplace Behavior & Harassment     | Gross | Harassment of employees, customers, suppliers, or visitors (including sexual harassment)     |
| Workplace Behavior & Harassment     | Gross | Gossiping, spreading rumors, or giving false information that harms the company's reputation |
| Workplace Behavior & Harassment     | Gross | Writing anonymous or pseudonymous letters criticizing management or colleagues               |
| Substance Abuse & Safety Violations | Gross | Possession or consumption of alcohol, drugs, narcotics in company premises                   |
| Substance Abuse & Safety Violations | Gross | Reporting to work under influence of alcohol/drugs                                           |
| Substance Abuse & Safety Violations | Gross | Smoking in prohibited areas                                                                  |
| Substance Abuse & Safety Violations | Gross | Breach of health, safety, fire, sanitation, or security rules                                |

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*Pooja Dushini, B*

*[Signature]*

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|                                     |       |                                                                                              |
|-------------------------------------|-------|----------------------------------------------------------------------------------------------|
| Substance Abuse & Safety Violations | Gross | Possession of weapons or firearms in company premises/accommodation                          |
| Security & Confidentiality          | Gross | Disclosure of confidential, technical, commercial, or financial information to third parties |
| Security & Confidentiality          | Gross | Breach of Company Non-Disclosure Agreements, SOPs, or Zero Tolerance policies                |
| Security & Confidentiality          | Gross | Misuse or sharing of system passwords                                                        |
| Security & Confidentiality          | Gross | Non-cooperation during company-approved security searches                                    |
| Unethical & Reputational Risks      | Gross | Participating in political or religious arguments in workplace                               |
| Unethical & Reputational Risks      | Gross | Misguiding customers on policies, products, or processes                                     |
| Unethical & Reputational Risks      | Gross | Conduct tarnishing the company's image or values                                             |
| Unethical & Reputational Risks      | Gross | Acceding authority beyond defined limits                                                     |
| Unethical & Reputational Risks      | Gross | Any activity that violates the company's Code of Conduct                                     |
| Criminal & Legal Offences           | Gross | Criminal offence, misdemeanor, or conviction by a court of law                               |
| Criminal & Legal Offences           | Gross | Nondisclosure of past criminal involvement                                                   |
| Criminal & Legal Offences           | Gross | Practicing improper conduct such as assaulting customers                                     |

## 6. TIMEFRAME

The timeframe for resolving the complaint will be 60 days, however, if for some reason there is delay of another 30 days, the same shall be communicated to the aggrieved party.

## 7. INFORMAL RESOLUTION

- Employees are encouraged to first raise concerns or grievances with their immediate supervisor or manager.

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- The employee should explain the situation calmly and respectfully, while the supervisor/manager will listen, counsel, and attempt to reach a mutually acceptable solution.
- Cases of minor misconduct may be dealt with informally through counselling.
- Where the evidence on record (e.g., late coming, unauthorized absence) is clear and requires no further investigation, the Function Head/Manager may:
  - Counsel the employee informally.
  - Maintain a record of such counselling in an Improvement Plan.
  - Provide clear instructions regarding expected levels of behavior/performance.
  - Notify the HCM function about the incident.
- If the employee does not improve within the agreed timeframe, the Function Head may recommend a formal warning letter through the HCM team.
- Repeated instances of misconduct shall be handled through the formal resolution process.

## 8. FORMAL RESOLUTION

- If an employee is unable to resolve a grievance informally, or feels uncomfortable raising it with their supervisor/manager, they may submit a formal grievance by email to the Grievance Redressal Committee (GRC).
- The GRC shall:
  - Review the grievance in detail.
  - Conduct necessary inquiry or deliberations.
  - Arrive at findings and recommendations.
- The final decision of the GRC will be communicated to the concerned employee in a transparent and timely manner.

## 9. CONFIDENTIALITY

- All formal grievances shall be **registered and tracked**.
- Records will be maintained by Zonal/Corporate HCM.
- Grievances and related investigations shall be treated with the **utmost confidentiality**.
- Information shall be shared strictly on a need-to-know basis with individuals directly involved in the investigation and its outcome.
- **No Retaliation:** Employees raising grievances or participating in the process shall not face retaliation. Any act of retaliation is strictly prohibited and subject to disciplinary action.

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## 10. GENERAL PROVISIONS FOR DISCIPLINARY ACTION

- The organization is committed to values of **good governance, integrity, transparency, and compliance** in all operations.
- This policy provides guidelines to address **non-compliance, negligence, or misconduct** at the workplace and supplements the **Code of Conduct**.
- The objective is to maintain a workplace that is **safe, respectful, and free from misconduct**.
- During the enquiry process:
  - **Performance bonus** shall be kept on hold.
  - **Increments** shall be kept on hold.
  - **Final payout** shall be released with arrears only upon proof of innocence.

## 11. DISCIPLINARY ACTION

- Any employee alleged to have committed misconduct may be issued a **Verbal Warning, Memo, or Show Cause Notice**, depending on the severity, as determined by the HOD/HCM head.
- The employee will be given **3 working days** to submit a written response.
- The Company reserves the right to initiate a **Departmental Enquiry** by appointing an internal or external **Enquiry Officer/Panel**.
- The Enquiry Officer/Panel shall:
  - Collect evidence.
  - Interview concerned parties.
  - Conduct a fair and unbiased investigation.
  - Submit a comprehensive report with findings and conclusions.
- Based on the enquiry, the Company will decide if the employee is guilty of misconduct.
- Disciplinary actions may include (based on severity):
  - Denial of increments, promotions, or other non-statutory benefits for a defined period.
  - Demotion in grade.
  - Dismissal/termination from service.
  - Initiation of criminal/legal proceedings as applicable.
  - Any other action deemed fit by the Company within the provisions of law.
- Repeated misconduct may lead to **termination of services**.
- All enquiry-related correspondence and findings will be recorded in the employee's **personal file**.

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## 12. IMPROPRIETY FOR EMPLOYEES

Non-compliance to established policies, processes and procedures is likely to vary in nature, severity, and frequency. Therefore, all efforts shall be made to review and resolve such incidents on case-to-case basis depending upon their nature, severity, and frequency.

The procedure to deal with any incidence of non-compliance, based on its occurrence, is detailed below -

### First Occurrence

- Employee may be given a **verbal warning**.
- If severity is high (as determined by HCM head and the **Disciplinary Action Committee – DAC**), direct termination may be recommended.
- A report shall be placed in the employee's personal file.
- The reporting manager shall counsel the employee to prevent recurrence.

### Second Occurrence:

- If repeated, the reporting manager shall escalate the matter to HOD and HCM head.
- The employee shall be issued a **written warning**.
- The DAC may recommend disciplinary action, including:
  - Stoppage of increment or performance bonus.
  - Termination, depending on severity.
- Employee receiving a second written warning shall be **ineligible for promotion for 2 years**.
- A copy of the report will be placed in the personal file.

### Third Occurrence:

- If the employee shows no improvement and repeats misconduct, the only recourse is **separation from the organization**.
- Termination must be reviewed and approved by the **Disciplinary Action Committee**.

## 13. POINT OF CONTACT

In case of any questions or clarifications regarding this policy, please reach out to [hr@sumadhuragroup.in](mailto:hr@sumadhuragroup.in)

## 14. MAJOR TIMELINES

| Stage / Action       | Timeline                                | Responsible Party | Notes                                                                                                                                  |
|----------------------|-----------------------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| Complaint Submission | Immediate / As soon as grievance arises | Employee          | Complaint must be submitted in prescribed template to <a href="mailto:grievances@sumadhuragroup.com">grievances@sumadhuragroup.com</a> |

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*Pooja Dashtin*

*[Signature]*

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|                                                    |                                                               |                                      |                                                                            |
|----------------------------------------------------|---------------------------------------------------------------|--------------------------------------|----------------------------------------------------------------------------|
| <b>Committee Meeting with Complainant</b>          | Within 15 days of receiving complaint (no later than 21 days) | Grievance Redressal Committee (GRC)  | First hearing; allegations recorded; supporting material can be submitted  |
| <b>Deposition of Respondent (Accused Employee)</b> | After Complainant's hearing (no fixed days)                   | GRC                                  | Respondent given full opportunity to present explanation (Natural Justice) |
| <b>Overall Complaint Resolution</b>                | 60 days from date of complaint                                | GRC                                  | Final resolution to be communicated to parties                             |
| <b>Extension (if delay occurs)</b>                 | +30 days (max 90 days total)                                  | GRC (must inform aggrieved employee) | Extension requires communication of reason for delay                       |
| <b>Employee Response to Show-Cause / Memo</b>      | 3 working days                                                | Employee (Respondent)                | Written reply to HR required                                               |
| <b>Improvement Plan (Informal Resolution)</b>      | Case-specific                                                 | Manager / Function Head              | Counseling monitored; HR notified; escalation if no improvement            |
| <b>First Occurrence of Impropriety</b>             | Immediate action                                              | Reporting Manager + HCM              | Verbal warning + counseling; record placed in personal file                |
| <b>Second Occurrence of Impropriety</b>            | Immediate action                                              | HOD + HCM + DAC (if severity high)   | Written warning; No promotion eligibility for 2 years                      |
| <b>Third Occurrence of Impropriety</b>             | Immediate action                                              | DAC approval required                | Termination / separation from company                                      |
| <b>During Enquiry (Disciplinary Cases)</b>         | Throughout enquiry                                            | HCM / DAC                            | Bonus, increments, payouts kept on hold until conclusion                   |
| <b>Final Decision Communication</b>                | Timely after enquiry report                                   | GRC / Company                        | Decision binding; copy placed in personal file                             |

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## Grievance Complaint Form:

Employee Name: \_\_\_\_\_

Employee ID: \_\_\_\_\_

Department: \_\_\_\_\_

Contact Information: \_\_\_\_\_

Date of Incident: \_\_\_\_\_

Location of Incident: \_\_\_\_\_

Parties Involved:

\_\_\_\_\_

\_\_\_\_\_

Description of Complaint:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Resolution Sought:

\_\_\_\_\_

\_\_\_\_\_

Additional Comments:

\_\_\_\_\_

\_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*Pooja Dasgupta*

*[Signature]*

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## Employee Improvement Plan (EIP) – Informal Grievance Resolution

### Employee Details

Name: \_\_\_\_\_  
 Employee ID: \_\_\_\_\_  
 Department: \_\_\_\_\_  
 Designation: \_\_\_\_\_  
 Reporting Manager: \_\_\_\_\_  
 Date of Discussion: \_\_\_\_\_

### 1. Background

Brief summary of grievance/concern raised and context of the informal resolution process.

### 2. Areas Identified for Improvement

Observed issues, concerns, or behaviors that need attention.

### 3. Agreed Action Plan

| Focus Area | Agreed Action/Commitment by Employee | Support from Manager/HCM | Timeline |
|------------|--------------------------------------|--------------------------|----------|
| _____      | _____                                | _____                    | _____    |
| _____      | _____                                | _____                    | _____    |
| _____      | _____                                | _____                    | _____    |

### 4. Expected Outcomes

\_\_\_\_\_  
 \_\_\_\_\_

### 5. Review & Follow-Up

Review Date: \_\_\_\_\_

Reviewed By (Manager/HCM): \_\_\_\_\_

Progress will be reviewed at the agreed intervals. Further escalation may occur if improvements are not observed.

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*Preraj Doshi*

*[Signature]*

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## Acknowledgment

I, \_\_\_\_\_ (Employee Name), agree to the above improvement plan discussed on \_\_\_\_\_ (date) and commit to working towards the stated outcomes.

Employee Signature: \_\_\_\_\_

Manager Signature: \_\_\_\_\_

HCM Representative Signature: \_\_\_\_\_

*Pooja Dashin. B*

*[Signature]*

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