



Employee Grievance Management Policy

Adani Airport Holdings Limited (AAHL)

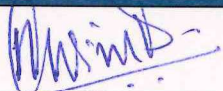

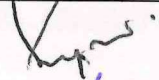

*The AAHL Grievance Management Policy is in alignment with the Group's Grievance Management Policy

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
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Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

1. POLICY STATEMENT

Adani Group has been on a tremendous growth trajectory during the past few years. We have become a diversified conglomerate with global repute and presence. With the growth of our group businesses and the employee strength, it becomes critical to have in place a unified policy, process and system that could address and resolve the grievances of our employees in a fair and time-bound manner.

Going forward, there will be an increased focus towards growth and diversification of our businesses. This will result in growth in both the scope and scale of our business leading to the creation of unmatched value for all our stakeholders. At Adani Group, our focus today is to build businesses, practices and processes that are not only sustainable but also the best in class. While pursuing and fulfilling various business imperatives, the group emphasizes and stands committed to implementing policies and process that uphold ethics and integrity along with Adani Values.

Effective and timely management of employee grievances is one of the most critical aspects of Employee/Industrial Relations. Grievances are the sign of an employee's discontent with his/her working conditions, processes, policies, welfare measures, opportunities for growth, supervision etc. Thus, it is imperative for us to have in place a formalized Grievance Management Process that will provide our employees with a platform for voicing their concerns and getting them addressed in a fair manner.

The group therefore expects all its employees to raise genuine grievances or concerns which they have about matters pertaining to:

- Error in Salary Payment
- Learning and Development
- Supervision
- General Working Conditions
- Process & Policies
- Welfare Measures
- Miscellaneous (Grievances which involve multiple categories mentioned above)

Any employee raising a genuine grievance/concern would be fully protected. The identity of the person raising a grievance would be treated in utmost confidence.

Any person raising a grievance/concern if found to be untrue or with an ulterior motive on investigation, is liable for suitable disciplinary action.

2. APPLICABILITY

This policy applies to all on-roll/regular employees of Adani Airport Business Unit.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

3. OBJECTIVE

'Grievance' may be any genuine or imaginary feeling of dissatisfaction or injustice which an employee experiences about his job and its nature, about the management policies and procedures.

The objective of the online grievance redressal mechanism is to provide a simple and easy access to all our employees for raising grievances and getting them addressed in a timebound manner.

The following are the key objectives of the Grievance Management System hereinafter referred to as 'SPEAK UP':

- To provide employees a fair and objective system to raise issues and complaints without any bias.
- To have in place a formal grievance procedure that supports employees to raise their concerns/ grievances without the fear of any negative repercussions.
- To instill within our employees the belief that their concerns will be taken seriously and handled fairly and transparently. This will in turn help to bolster staff morale and maintain levels of productivity.
- To aid the management in identifying any unacceptable or unlawful gaps in the current system of working.
- To help the management in identification and resolution of minor disagreements before they turn into major disputes.

4. SCOPE

The grievances raised by Adani employees can be categorized into the following key areas and the scope of the grievance redressal and resolution will be limited to the grievance areas that are defined in the table below.

Any other grievance raised shall be categorized as miscellaneous and will be dealt accordingly. It is important to note that grievance redressal for supervision, will have to be handled in an anonymous manner and that process is detailed below.

The table below indicates the various grievance types and grievance areas that will be considering for resolution under each type:

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

Grievance Type	Key Grievance Area
Error in Salary Payment	Non communicated deductions
	Mistakes in wage calculations. These issues to be raised in the SPEAK UP only if raised earlier to HRSSC and employee is not satisfied with the reply. Employees to produce proof of having raised with HRSSC.
Learning & Development	Matters related to Learning & Development wherever committed as a part of IDP.
Supervision	Misbehaviour, Unfair Treatment, Lack of Guidance and Work harassment etc.
General Working Conditions	Working Environment
	Leaves and Attendance Related
	Interpersonal Relationships in Department
Process & Policies	Non-Implementation of Applicable Policy
Welfare Policies	Transportation Facility (Wherever such facility is provided)
	Canteen Facility
	Township Management
	Welfare Measures

Note: Please note that this system categorically excludes matters relating to performance appraisals, merit increments, wage & compensation including incentive, upgradation or promotion, medical insurance, issues related to disciplinary actions taken by the management, Whistle Blower and Sexual Harassment (Separate process exists for addressing issues pertaining to Whistle Blower and Sexual Harassment).

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

5. GRIEVANCE REDRESSAL EXCEPTIONS:

A system can be considered as fully functional when all the minute details are accounted for. There may be certain grievances that can be raised against the members of the GRC. In such cases, the usual mechanism of grievance redressal will not suffice. Thus, SPEAK UP has a separate mechanism for redressal of grievances against the members of GRC.

As a part of our endeavor to provide our employees a fully transparent and fair system that allows them to raise any grievance against any individuals without having the fear of any negative repercussions. In such cases, the employee can directly write an email to the BU HR Head seeking the resolution of grievance. There is no need for an employee to raise a grievance ticket for these exception cases. The timeline for resolution of exception cases will be 14 working days which is the same as any normal grievance. The decision of the BU HR-Head shall be final and binding on the employee.

In case BU HR-Head is the member of BU GRC and a grievance is raised against him/her, then the decision of the BU CHRO shall be final and binding on all parties.

6. ROLES & RESPONSIBILITIES OF KEY STAKEHOLDERS

There are various stakeholders who are involved in the process of grievance redressal. The roles and responsibilities of all the key stakeholders in SPEAK UP are mentioned below:

A. Grievance Redressal Committee (GRC):

The Grievance Redressal Committee (GRC) is the first point of contact in SPEAK UP. The Grievance Redressal Committee (GRC) is primarily responsible for heeding employee grievances and resolving them as and when the grievance is raised by the employee.

B. Role of GRC Secretary

The Success of the Grievance Redressal system depends on the initiative and capability demonstrated by the GRC Secretary. A GRC Secretary is the central enabler of grievance management system at Adani. The Role of the GRC Secretary is pivotal to the success of the grievance redressal process as he/she plays the role of a mediator between the GRC Members and Investigator (Enabler). The GRC Secretary is the fulcrum of the entire process as he/she directs a grievance from initiation to the closure phase.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

C. Responsibilities of GRC Secretary

The Responsibilities of the GRC Secretary can be divided into four major areas:

i. Preliminary Investigation & GRC Operations

- Acknowledge a grievance inside 3 days of receiving it from the user and acknowledge
- Conduct Preliminary investigation prior to tabling grievance before GRC
- Pivotal role in Day-to-day GRC communication and appointment of Investigator • Interfacing with Investigator, GRC & Employee

ii. Tracking & Monitoring Grievances

- GRC Secretary is the only member who has the system access on the ORACLE tool.
- The Grievance Lifecycle Management from acknowledgement to investigation to closure of the grievance lies with GRC Secretary

iii. System & Operational Tasks

- Acknowledging the employee grievance on oracle
- Investigating the grievance by himself/herself or assigning an investigator when needed
- Tabling the results of the investigation along with outcomes/action undertaken by investigator before the Grievance Redressal Committee
- Communicating the decision of the GRC to User
- Resolution i.e., closure of the grievance on Oracle

iv. Communication & Partnering

- Communicating with the User (Employee) to apprise him/her the status of the grievance
- Coordinate amongst the members of the GRC to arrive at decision and gain consensus of GRC Members for ensuring smooth resolution
- Partner with Investigators from within and outside the GRC i.e., Site/BU HR, HRSSC & other stakeholders

D. Constitution of the Grievance Redressal Committee (GRC):

The Grievance Redressal Committee's shall consist of the following representatives for every establishment with 20 or more on roll employees:

- CXO's from the BU (one representative ideally)
- Site Heads/Nominated representatives of the Site Head

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

- Human Resources Heads (Site/BU)
- Heads of BU IT/HSE/Corporate Affairs/Security
- Employee Representatives (representatives from various depts. below DGM)

The GRC formation shall be undertaken BU HR-Head who shall identify and nominate members to BU GRC. The following are the Checkpoints for GRC Formation:

- Always ensure that equal no. of management and employee representatives are included in a BU's GRC.
- It is better to have 2 or more HR People in the GRC to ensure that employees grievances can be addressed in a speedy manner.
- The GRC Secretary must have HR/ER background
- No BU GRC shall have more than 10 nominated members

Once the GRC is formed, the same shall be notified to all the applicable employees with the relevant contact details.

E. Roles and Responsibilities of the GRC:

I. Roles and Responsibilities of the GRC:

GRC is the central stake holder for the employee grievance redressal mechanism at Adani. The role of the GRC would be as follows: -

1. To assess the concern /issues raised by the employees.
2. To allocate the grievances to an investigation officer for investigating every employee grievance without any bias and to also maintain a transparent approach toward resolution of grievance.
3. To arrive at an appropriate decision in consultation with the investigating officer after looking into all the facts and evidence presented before them relating to the grievance.
4. To assist the stake holders and the appellate authority in all relevant matters so that employee grievances are resolved to the best extent within the scheduled timelines.

II. Responsibilities of GRC:

1. Acknowledgement of grievance.
2. Get a thorough investigation conducted on the grievance raised.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

3. The GRC members shall nominate a chairman for a period of 1 year who shall head the GRC and look into the day-to-day functioning. The GRC Secretary nominated shall coordinate with all GRC members for taking their opinion/ suggestion pertaining to the grievance.
4. The GRC shall nominate an investigating officer who can be one of the committee members or any other to investigate the grievance and apprise the GRC on the facts and evidence pertaining to the grievance. The investigating officer shall document the case and provide his/her concluding remarks, for aiding the GRC in its decision making.
5. Interacting on a periodic basis for resolution of grievances.
6. Adhering to the timelines of 14 working days for resolution of grievances.
7. Maintaining the records of grievances along with the details of investigation.
8. Guiding the stakeholders in resolving the issues and validation of the solution provided.

F. Action by Grievance Redressal Committee (GRC):

The following cited are the stakeholder involved in the grievance redressal process.

- HRSSC
- Investigating Officer
- Reporting Manager
- GRC Secretary
- BU HR
- BU Head-HR
- Appellate Authority

I. Role of HRSSC:

HRSSC shall understand the issue and resolve any employee queries pertaining to error in salary payment within the stipulated timeline of 14 working days from the date and time of receipt of the grievance ticket by GRC Secretary. All necessary investigations must be carried out and necessary actions should be taken to resolve the grievance.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

II. Responsibilities of HRSSC:

1. HRSSC as a key stakeholder will be responsible for investigating and providing solutions for any grievances raised under the grievance category of "Errors in Salary Payment".
 - a. Non-Communicated deductions.
 - b. Mistakes in wage calculations
2. The HRSSC shall verify and validate the genuineness of the raised concerns and then undertake appropriate actions for grievance resolution.
3. The HRSSC shall investigate and present the details of the grievance to the GRC Secretary and arrive at appropriate decision. The HRSSC representative shall present his solution in the investigation report with necessary proofs to GRC Secretary for final closure of the grievance.
4. The GRC Secretary shall put the findings of the investigation and solution offered in front of the GRC Committee, to arrive at a decision with more than half the members in agreement.
5. The GRC Secretary shall further inform the user on the solution offered and close the grievance after informing the GRC Members.
6. The HRSSC representative and GRC Secretary must ensure the closure of the grievance before 14 working days.

G. Role of Reporting Manager:

Reporting Manager shall aid in the investigation and resolution of employee queries pertaining to grievance categories of 'Learning & Development' and 'General Working Conditions'. Reporting Managers must not be consulted in any other grievances than the ones mentioned above.

i. Responsibilities of Reporting Manager:

1. The Reporting Manager shall verify and validate the genuineness of the raised concerned based on the clarifications sought by Investigation officer.
2. The Reporting Manager shall provide all necessary support when a grievance is raised pertaining to the aforementioned categories of grievances.
3. The Reporting Manager **must not try to influence** the outcomes of the investigation and shall **ensure the confidentiality** of the matters pertaining to the grievance raised by his/her reportee.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

ii. **Role of BU-HR:**

The BU-HR is the most critical stakeholder as they responsible for investigation and resolution of queries pertaining to almost all grievance categories either directly or indirectly by engaging with the BU GRC Secretary. The BU-HR shall investigate and resolve any employee queries pertaining to the categories of Learning & Development, Supervision, General Working Conditions, Process & Policies, Welfare Polices and Miscellaneous within the stipulated timeline of 14 working days from the date and time of receipt of the grievance ticket by GRC Secretary.

H. **Responsibilities of BU HR:**

1. BU-HR as a key stakeholder will be responsible for carrying out the investigation of any grievances raised under Learning & Development, Supervision, General Working Conditions, Process & Policies, Welfare Polices and Miscellaneous.
2. The BU-HR shall verify and validate the genuineness of the raised concerned based on the findings of Investigation.
3. In case of HRSSC being the investigator, the BU-HR shall accord all necessary support to BU GRC Secretary in the resolution of grievance.
4. While investigating a grievance for 'Supervision' Category, the BU-HR shall ensure that the employee is protected from all negative repercussions. The BU-HR shall investigate the matter with utmost sensitivity and ensure confidentiality in all matters pertaining to the investigation.
5. The BU-HR shall provide all necessary support when a grievance is raised before the Appellate authority.
6. The BU-HR shall present the details to the GRC Secretary and aid the BU GRC in arriving at an appropriate decision

i. **Role of BU Head-HR:**

The BU Head-HR shall investigate and resolve any employee queries pertaining to policies and process within the stipulated timeline of 14 working days from the date and time of receipt of the grievance ticket by GRC Secretary.

ii. **Responsibilities of BU Head-HR:**

1. The BU Head-HR will be responsible for any grievances raised under "Policies and Process"- Non implementation of applicable policy.
2. The BU Head HR shall verify and validate the genuineness of the raised concerned based on the Investigation Officer reports.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

3. The BU Head-HR shall provide all necessary support when a grievance is raised before the Appellate authority. The BU Head-HR shall reply to the employee with the solution within the stipulated timelines.
4. The HRSSC shall present the details to the GRC and arrive at the appropriate decision and mark a copy of the same to GRC for updating the closure of record.

7. Appellate Authority:

The Appellate Authority is a critical stakeholder in the SPEAK UP. Appellate Authority is primarily responsible for heeding employee grievances which are not resolved to his/her satisfaction by the GRC. The Appellate Authority shall resolve the employee grievance as and when the appeal is raised. For every site/asset location, the BU CEO shall act as the Appellate Authority. The BUCEO shall act as the de facto Appellate Authority.

a. Process of Grievance Resolution- Appellate Authority

Any employee who isn't satisfied with the response or decision of BU GRC shall approach appellate authority within 30 days from the decision by BU GRC.

The following are the steps to be undertaken by the employee:

1. The employee shall write an email to the BU HR-Head detailing the grievance and shall also highlight his/her reasons for dissatisfaction with the outcomes of grievance resolution undertaken by BU GRC.
2. The BU HR-Head shall conduct a preliminary investigation with the help of BU GRC Secretary and BU GRC. Post which, the same should be conveyed to BU CEO (Appellate Authority) and BU CEO shall suggest the course of action to be undertaken for resolution.
3. The BU HR-Head shall inform the employee over a call/video conferencing/face-to-face mode, the outcomes of the decision of the Appellate Authority, to ensure satisfactory closure.
4. The BU HR-Head shall send a formal e-mail reply to the employee informing him/her the outcomes of the decision by Appellate Authority. This mail reply shall also be sent to the BU GRC Members & BU CEO for official records. (To be kept in CC)

b. Role of Appellate Authority:

The role of the Appellate Authority is to review and resolve the employee grievances that are not resolved to the satisfaction of the employee by the BU GRC. Any decision by the Appellate Authority **shall final and binding on all concerned parties.**

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

c. Responsibilities of the Appellate Authority:

The following are the responsibilities of the Appellate Authority:

1. The Appellate Authority shall meet/consult with the GRC Members to understand the nature of grievance and reasons for GRC's decision.
2. The Appellate Authority shall meet/consult with the process stakeholder (investigator) involved in resolution of the grievance raised.
3. The Appellate Authority can launch a fresh investigation if desired by him/her.
4. In consultation with GRC and Process Stakeholder, the Appellate Authority shall respond with his/her decision to the employee within 14 working days from the date and time of receipt of the appeal.
5. Appellate Authority's decision shall be conveyed to the employee by the BU HR-Head in writing and shall be monitored by the BU CEO (Appellate Authority)

8. SPEAK UP- Operating Principles

There are a few key operating principles based upon which the SPEAK UP has been designed:

- Grievance Redressal Committee must complete the proceedings of any grievance within **14 working days** from the receipt of grievance by GRC Secretary on the oracle portal.
- The BU GRC Secretary shall respond to the employee acknowledging the receipt of the grievance within **3 working days** from which it is raised on oracle portal.
- The decision of the GRC on application filed before it is to be made based on majority views of the GRC, i.e. with **at least half of the members** agreeing to the decision.
- The BU GRC Secretary shall allocate and assign the grievance to the concerned stake holders for investigation in consultation with BU GRC Members.
- The BU GRC Secretary shall conduct a preliminary investigation before tabling the case before GRC to speed up the grievance resolution process
- The employee aggrieved by the decision of the GRC or whose grievance is not resolved by the GRC to his/her satisfaction, can appeal to the appellate authority (BU CEO/Station Head) **within 30 days** of the GRC decision.
- The Appellate authority shall consult with the BU HR-Head and BU-GRC Secretary before proceeding further with his/her decision on the grievance. This process should be completed within **14 working days** from the date the employee raises his/her case before the BU-HR Head.
- The decision of the Appellate authority on the matters pertaining to the grievance shall be binding and final on all the parties involved.

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

- In case the raised grievance is against any of the GRC members, the BU HR-Head shall investigate and resolve such grievances. The decision of the BU HR-Head shall be final.

The timeline for resolution shall be within **14 working days**.

9. Grievance Redressal Process and Timelines

The SPEAK UP online grievance management system is configured on the Oracle HCM portal. It provides multiple advantages to the user in terms of ease of access and simplicity of the process. Any User can access the Grievance Management Tool on the Oracle HCM at the web address mentioned below:
eibd.fa.em2.oraclecloud.com/fscmUI/adfAuthentication

a. Steps to Raise a 'Grievance':

1. Click on "A Net" browser and then click on "Oracle PMS" or **alternatively you can use chrome or any other permissible browser** and then **open oracle application** using the link: eibd.fa.em2.oraclecloud.com/fscmUI/adfAuthentication
2. Click on Adani Grievance Management Tool
3. Click on Grievance Service Requests
4. Click on Create Service Request

Please enter the title of your grievance, categorize its severity & criticality. Ensure that fields mentioned below are filled completely.

- Title- Provide a Title for the Grievance in brief
 - Severity- Classify the severity of the grievance from the dropdown
 - Category- Enter you BU Name and select the category of grievance to be selected from dropdown
 - Attachments: In case you need to attach any documents or files as proof please do so by clicking on the "+" Sign
 - Service Request Details: Please describe your grievance
 - Click Save and Close to submit the Grievance
5. After this process is completed, the User would see a Confirmation of Registration of Grievance and list of all grievances raised are displayed on the screen in front of the user.

b. Timeline of Grievance Process

The Lifecycle of a 'Grievance' encompasses the various stages through which a grievance raised passes through before its eventual resolution. The Process starts with

Human Resources	 Policy on Employee Grievance Management	Doc No: HR/PLCY/07
		Revision No: Original Version
		Issue Date: 01-04-2024

a grievance being raised by an employee; Grievance gets acknowledged by the GRC Secretary; Grievance is assigned for investigation; Investigation is concluded, and Grievance findings are reported back to GRC Secretary; Grievance is eventually resolved by GRC Secretary which eventually leads to Grievance Closure/ Resolution.

The following are timelines of the Grievance Resolution Process:

1. In the **first stage**, the User (employee) raises a grievance on the oracle-based grievance management tool. Upon submission of the grievance, the system **automatically** assigns the grievance to GRC Secretary for resolution of the grievance.
2. The GRC Secretary must acknowledge the grievance within **3 working days** of receiving the grievance and inform the user.
3. In the **second stage**, the GRC Secretary reviews the grievance raised and conducts a primary investigation before tabling the grievance in front of the BU GRC Committee. The committee discusses the case and appoints an investigator. The GRC Secretary now assigns the grievance to the 'appointed' investigator on the Oracle HCM Portal.
4. In the **third stage**, investigator conducts the investigation and records the observations pertaining to the grievance. The Investigator reports back these findings to GRC Secretary via the oracle portal and transfers back the flow of the grievance to GRC Secretary.
5. In **fourth and final stage** of the grievance flow process, GRC Secretary tables the findings of the investigation conducted before the BU-GRC Committee to arrive at a resolution of the grievance.
6. Based on the final decision of all the GRC Members, the GRC Secretary conveys the decision to the user with the details of the resolution of grievance. Then, the GRC Secretary closes the grievance thereby marking the closure of grievance.

The total working time provided for the resolution of grievance from raising the grievance to its closure is **14 working days**. It is the responsibility of the BU GRC Secretary and the BU GRC to ensure the closure of any grievance.

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