



# NOCIL Limited

## Employee Grievance Redressal Policy

- Approved by the Core committee on Sustainability on 18<sup>th</sup> November, 2025 w.e.f 1<sup>st</sup> December, 2025
- Issued under the hand of the Managing Director on 1<sup>st</sup> December, 2025

FOR NOCIL LTD.

A handwritten signature in blue ink, appearing to read "ANAND V.S.", written over a horizontal line.

ANAND V.S.  
Managing Director



### Introduction

This Policy establishes a fair, transparent, and prompt process for addressing employee grievances within NOCIL Ltd ( hereinafter referred to as NOCIL / the Company)

At NOCIL, we are committed to fostering and maintaining a positive and respectful relationship with our employees. Guided by our core value Respect, we ensure that every employee is heard, valued, and treated with fairness and dignity. We believe that collaborative behaviour and transparent communication are essential to support strong employer-employee relations and contribute to long-term engagement. To uphold these principles, we have established a clear and open grievance procedure that provides employees with a reliable channel to voice and address their concerns.

### The core objectives of this Policy are:

- To ensure that employee grievances can be shared and heard through formal channels and then can be responded to promptly and addressed appropriately.
- To provide employees with a channel for raising concerns without fear of reprisal.
- To ensure all grievances are handled with confidentiality, impartiality, and fairness.
- To foster a positive and harmonious working environment, supporting the Company's commitment to good corporate governance.

### Applicability

All permanent and temporary employees (excluding contracted employees /retainers / workmen covered under Labour legislations) working across all functions and locations of NOCIL in India.

Definition of Grievance	Any dissatisfaction or feeling of injustice, in relation to one's employment, which is brought to the notice of management. This includes issues related to: <ul style="list-style-type: none"><li>• Terms and conditions of employment (e.g., wages, leaves, working hours).</li><li>• Work environment (e.g., safety, hygiene).</li></ul>
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	<ul style="list-style-type: none"><li>• Interpersonal relationships (e.g., harassment, unfair treatment, bias) ;</li><li>• Application of Company policies.</li></ul> <p><u>Examples</u></p> <ul style="list-style-type: none"><li>• Unfair Treatment/Discrimination</li><li>• Workplace Environment (Safety, Facilities) :</li><li>• Pay, Leave, Hours</li><li>• Interpersonal Conflict/Bullying</li></ul>
Exclusions	<p><u>This policy does not cover:</u></p> <ul style="list-style-type: none"><li>• Decisions related to promotions, transfers, or salary revisions that are solely at the Company's discretion, unless the grievance alleges unfair procedure or discrimination ;</li><li>• Matters related to disagreement with company policies and processes. Such feedback or concerns can be shared with manager, skip level manager, HOD, HR or other leadership team members ;</li><li>• Matters covered under specific statutory policies (e.g., Sexual Harassment Policy under the POSH Act).</li></ul>
Guiding Principles	<ul style="list-style-type: none"><li>• <u>Confidentiality:</u> All details of the grievance and the identity of the aggrieved employee will be kept strictly confidential, except where disclosure is necessary for the investigation or required by law ;</li><li>• <u>No Victimization:</u> No employee shall be subjected to any adverse action, punishment, or retaliation for reporting a genuine grievance or assisting in an investigation ;</li></ul>





	<ul style="list-style-type: none"> <li>• <b>Natural Justice:</b> The employee will be given a full and fair opportunity to present their case, and the investigating authority will act without bias ;</li> <li>• <b>Timeliness:</b> All steps must be completed within the specified timelines to ensure prompt resolution ;</li> <li>• <b>Anonymity:</b> The identity of the employee will be kept anonymous. Disclosure of employee identity will occur only if necessary to conduct a fair investigation and only with the employee's prior consent ;</li> </ul>
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**Process Flow / Procedure:- Employee should follow escalation levels outlined below.**

The procedure involves a structured four-level escalation process. The aggrieved employee must first attempt to resolve the issue at the immediate level before escalating.

Level	Authority / Committee	Role / Responsibility	Target Resolution Timeline
Level 1 (Immediate)	Line Manager / Skip Level Manager	<ul style="list-style-type: none"> <li>• The first point of contact for addressing any grievance will be the Line Manager.</li> <li>• If the grievance pertains to the Line Manager, the employee may raise the concern directly with the Skip Level Manager.</li> <li>• If the grievance involves the Skip Level Manager as well, the employee may skip Level 1 and approach the Level 2 point of contact directly.</li> </ul>	Within 10 working days of the last incident of grievance.





Level 2	Site HR	<ul style="list-style-type: none"><li>Any unresolved issues at Level 1 will be escalated to the point of contact at Level 2 for further review and resolution.</li><li>Employee needs to fill the Annexure A and share it with Site HR.</li></ul>	Within 10 working days of escalation.
Level 3	Head of Department / Head HR	Any unresolved issues at Level 2 will be escalated to the point of contact at Level 3 for further review and resolution.	Within 15 working days of escalation.
Level 4	Respective President	Any unresolved issues at Level 3 will be escalated to the point of contact at Level 4 for further review and resolution.	Within 15 working days of escalation

**Note –** Employee needs to fill the grievance redressal form and email the same to relevant level SPOCs.

### Amendments to the Policy

The Core Committee on Sustainability is empowered to carry out suitable modifications / amendments to the Policy

### Record Keeping and reporting

- The HR Department is responsible for maintaining a confidential record of all formal grievances, investigations, and resolutions for a minimum period as prescribed by the **ARCHIVAL POLICY** ;
- The Board of Directors and/or the Audit Committee will be presented with a summary report of grievances and their resolution status **periodically (half-yearly)** to ensure compliance and identify systemic issues.





### Employee Formal Grievance Submission Form

Please complete this form in full. Ensure clarity and factual accuracy. Attach additional sheets if necessary. The written grievance must include:

- Employee Name, Designation and Department.
- Date of occurrence of the event/incident.
- A clear, factual and chronological description of the grievance.
- Details of the steps already taken (Level 1/2)

#### Declaration and Signature

I affirm that the information provided in this form is true and accurate to the best of my knowledge and belief. I understand that this information will be used solely for the purpose of investigating and resolving this grievance in line with the Company's policy.

I confirm that I have read and understood the Company's No Victimization policy.

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

Countersigned by Company Secretary

FOR NOCIL LTD.

ANAND V. S.  
Managing Director