



## **SARDA ENERGY & MINERALS LIMITED**

Regd. Off: 73-A, Central Avenue, Nagpur (MH.) 440018  
Ph: +91-712-2722407; Fax: +91-712-2722107 Email: [cs@seml.co.in](mailto:cs@seml.co.in)  
URL: [www.seml.co.in](http://www.seml.co.in) CIN: L27100MH1973PLC016617

### **Grievance Redressal Policy**

#### **1. Preamble**

SEML ("the Company") is committed to conducting its business in a fair, transparent, and responsible manner. An effective grievance redressal mechanism is integral to maintaining trust with employees, communities, and other stakeholders, and to upholding the principles of ethical conduct, accountability, and respect for human rights.

This Policy establishes a structured framework for receiving, reviewing, and resolving grievances raised by both internal stakeholders (employees) and external stakeholders (communities and others affected by operations) in a timely, impartial, and confidential manner.

#### **2 Objectives**

The objectives of this Policy are to:

- i) Provide accessible and credible channels for raising grievances;
- ii) Ensure grievances are addressed fairly, consistently, and within defined timelines;
- iii) Promote early identification and resolution of concerns before escalation;
- iv) Protect individuals from retaliation for raising genuine grievances; and
- v) Strengthen stakeholder trust and organisational accountability

#### **3 Scope and Applicability**

This Policy applies to grievances raised by:

- i) Internal Stakeholders
  - a) Permanent, temporary, probationary, and contractual employees of the Company
- ii) External Stakeholders
  - a) Communities residing in and around SEML's operational areas;
  - b) Individuals or groups impacted directly or indirectly by SEML's operations;
  - c) Other external stakeholders, excluding customers and vendors in routine commercial matters

This Policy does not replace or override statutory mechanisms such as POSH, Whistle Blower, or disciplinary proceedings, which are governed by separate policies.

#### **4 Effective Date**

This Policy comes into effect from 23.05.2026.

#### **5 Definition of Grievance**

A grievance refers to any concern, complaint, or dissatisfaction arising from perceived unfair treatment, adverse impact, or violation of rights, whether actual or perceived, related to the Company's operations, workplace practices, or conduct.

#### **6 Guiding Principles**

Grievance redressal at SEML shall be guided by the following principles:

SEML: Grievance Redressal Policy



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- i) Fairness and impartiality
- ii) Confidentiality and sensitivity
- iii) Timeliness and responsiveness
- iv) Non-retaliation
- v) Transparency and accountability

**7 Grievance Redressal Framework**

SEML follows a dual-track grievance mechanism, depending on the stakeholder category.

**i) Employee Grievance Redressal Mechanism**

**a) Coverage**

Employee grievances may relate to, inter alia:

- i) Working conditions and supervision;
- ii) Policies, processes, and welfare measures;
- ii) Learning and development;
- iv) Compensation-related errors or discrepancies;
- v) Interpersonal or workplace issues.

Matters related to performance appraisals, promotions, disciplinary actions, sexual harassment, and whistleblowing are governed under separate policies.

**b) Process**

- i) Employees may raise grievances through designated internal channels communicated by the Human Resources department.
- ii) Grievances shall be acknowledged, reviewed, and investigated by a designated Grievance Redressal Committee (GRC) or authorised personnel.
- iii) Resolution shall be communicated within a reasonable and defined timeframe.
- iv) Employees dissatisfied with the outcome may seek escalation through an appellate mechanism as notified internally.

**c) Protection and Confidentiality**

- i) The identity of the complainant shall be protected
- ii) Retaliation against any employee for raising a grievance in good faith is strictly prohibited

**ii) Community & External Stakeholder Grievance Mechanism**

**a) Coverage**

This mechanism applies to grievances relating to:

- i) Social, environmental, or economic impacts of SEML's operations;
- ii) Community concerns arising from project activities;
- iii) Issues affecting local livelihoods, safety, or well-being

**b) Approach**

SEML's community grievance mechanism is aligned with the National Guidelines on Responsible Business Conduct (NGRBC) and emphasises dialogue, participation, and



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early conflict resolution.

Grievances may be raised:

- i) Verbally or in writing;
  - ii) Individually or collectively; and
  - iii) Through community representatives or designated Company personnel.
- c) Redressal Process
- i) Grievances shall be recorded, reviewed, and assessed for severity and impact
  - ii) Appropriate corrective or preventive actions shall be identified in consultation with relevant internal teams
  - iii) Where necessary, coordination with local authorities or community institutions may be undertaken
  - iv) Closure shall be communicated to the grievant, and feedback may be sought

**8 Roles & Responsibilities**

- i) Board: Overall oversight of grievance governance
- ii) Human Resources: Administration of employee grievance mechanisms
- iii) CSR / Site Teams: Management of community and external grievances
- iv) Managers and Department Heads: Supporting timely resolution and implementation of corrective actions
- v) Employees: Raising concerns responsibly and in good faith

**9 Escalation and Appeal**

Where a grievant is dissatisfied with the resolution:

- i) An escalation may be made to a higher authority or designated appellate forum within the Company
- ii) Appeals shall be reviewed independently and decided in a fair and time-bound manner

**10 Monitoring, Reporting and Review**

- i) Grievance data shall be periodically reviewed to identify trends and systemic issues
- ii) Insights from grievances may be used to improve policies, processes, and stakeholder engagement
- iii) This Policy shall be reviewed periodically and updated as required

**11 Non-Retaliation & Misuse**

SEML prohibits retaliation against any individual raising a grievance in good faith.

However, grievances found to be intentionally false, malicious, or made with ulterior motives may attract appropriate action under applicable Company policies.