



Grievance Redressal Mechanism

Document No. SEIT-HR-POL-GRC-007-15072024

Document Classification: Internal Circulation



Table of Contents

1	Introduction	2
2	Version Control	2
3	Custodian	2
4	Confidentiality Clause	2
5	Scope	2
6	Definitions	3
7	Types of Grievances	4
7.1	Internal (indicative list)	4
7.2	External (indicative list)	4
8	Exclusions	4
9	Non-Retaliation	5
10	GRM Communication	5
11	Grievance Redressal Committee	5
12	Submission procedure	6
13	Redressal process	6
14	Reporting	6
15	Training and Awareness	7
16	Review of the Guidelines	7

1 Introduction

SEIT / Companies (as defined hereinafter below) wishes to provide an equitable platform to all its stakeholders for registering any form of complaints and grievances, with an assurance that the grievances would be addressed by the Company in a structured and time-bound manner. Grievances may include specific complaints or general concerns about activities at our offices, our assets or our business in general. The purpose of this Grievance Redressal Mechanism (hereinafter referred to as “GRM”) is to provide a forum to internal and external stakeholders to voice / lodge their concerns, queries and issues with the Company. Such a mechanism is expected to provide stakeholders with an official channel through which their queries/ concerns would be addressed by the Company in a time-bound manner while at the same time enabling the Company to assess if there are any systemic issues that need to be addressed in the interest of sustainability of the business. This GRM is applicable to grievances raised by both external stakeholders and internal stakeholders (both as defined hereinafter below).

Any term not defined herein shall have the same meaning or definition as contained in the Company’s DoA, Policies, Guidelines / Codes (*in the same order*).

2 Version Control

#	Version	Date of issue	Prepared by	Reviewed by	Approved by
1	1.0	27/03/2024	Head – HR	GC & CCO	CEO
2	2.0	15/07/2024	Company Secretary	GC & CCO	CEO

3 Custodian

The CS department is the custodian of this document and is responsible for ensuring compliance and regular monitoring of the process laid down by this document.

4 Confidentiality Clause

This is a confidential document specific to SEIT. The contents of this document cannot be altered or copied or reproduced except for reference during the normal course of business associated with SEIT. Reproduction, publishing or copying this document for any other purpose shall require the approval of the Corporate Controller.

5 Scope

This guideline is applicable to

- Sustainable Energy Infra Trust (referred to as "SEIT" or the "Trust"),
- the Investment Manager to SEIT (the “IM”),
- the Project Manager to SEIT (the “PM”)
- all the Special Purpose Vehicles that are subsidiaries of the Trust housing the renewable energy assets (the “SPVs”), and
- subsidiaries / associates / affiliates of SEIT

as adopted by them (hereinafter individually referred to as the “Company” and collectively referred to as the “Companies”)

6 Definitions

- "**Complaint**" means a minor issue that can be resolved directly and by means of simple actions and includes an unaddressed Concern.
- "**Concern**" means questions and requests for information, or general perceptions unrelated to a specific impact or incident. If not addressed to the satisfaction of the complainant, Concerns may become Complaints.
- "**Contractor**" means any third-party individual or entity engaged by the Company to carry out work or offer services to the Company under a contract with or without deployment of Contract Workers.
- "**Contract Workers**" means individuals employed or engaged by any Contractor or his sub-contractor to carry out work for the Company and includes inter-state migrant workers.
- "**External Stakeholders**" means stakeholders other than employees of the Company and the Board of the Company including workers (including migrant workers) engaged by the Company through its contractor and sub-contractors, individuals or groups outside the Company's business who are not directly employed or contracted by the Company but are impacted by the Company's activities during operations such as local community or Vulnerable Groups; or individuals or groups who have an interest or influence in the Company or may be impacted by decisions of the Company, the Company's investors, and other interested persons including governments, contractual counter-parties, etc.
- "**Frivolous Complaint**" means any Concern, or Grievance, or Complaint which is registered or attempted to be registered under this document with no evidence or on hearsay basis or with mala fide intentions, arising out of false or bogus allegations.
- "**Grievance**" means any discontent or dissatisfaction that may arise due to the Company's operational activities including the behavior of its workforce. Grievances may also include adverse economic, environmental, and social Concerns.
- "**Grievance Coordinator**" means an individual designated by the Company who is responsible for receiving, recording, escalating, and reporting grievances. Unless otherwise specified in writing by the CEO, the Company Secretary of the IM will be the designated Grievance Coordinator for the Companies.
- "**Grievance Redressal Committee**" means a committee constituted under this Grievance Redressal Mechanism.
- "**Grievance Redressal Mechanism**" means this mechanism, which is formalized to receive, assess, resolve, escalate and resolve Concerns, Complaints and Grievances concerning Internal Stakeholders and External Stakeholders.
- "**Internal Stakeholders**" means the individuals employed by the Company and include the Company's Board of Directors
- "**Site In-charge**" means an officer nominated by the Company at an asset location to be the designated Manager under the provisions of the Factories Act.
- "**Vulnerable Groups**" means individuals or groups who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to ethnicity, gender, language, religion, political views, dependence on natural resources, sickness or disability or other factors.

7 Types of Grievances

7.1 Internal (indicative list)

- *Grievance related to working conditions:* Examples include poor physical condition at the workplace, non-availability of proper tools and machines, frequent unwarranted and unplanned changes in schedules and procedures, etc.
- *Grievance related to the Company's policies:* Examples include terms of employment (like job responsibilities, dress code, benefits such as insurance and retirement plans not provided or fulfilled as part of the contract of employment or as per Company policy), workload, training, settlement of terminal benefits, lack of opportunities for career growth amongst others.
- *Interpersonal grievances at the workplace:* Examples include discrimination of any form (except discrimination on account of disability, sexual orientation or LGBTQIA+ or HIV-affected status or other nature which may have been addressed under other specific policies/codes/ guidelines or for which any other redressal mechanism has been created by the Company), poor relationship with supervisor, gender bias, unethical behaviour, harassment (except sexual harassment as it has been addressed under the PoSH Code), abuse of any other form, etc.

7.2 External (indicative list)

Grievances may include:

- Concerns over terms of employment (including payment of applicable wages and overtime compensation and benefits) by their respective Contractor, any dissatisfaction with working practices or conditions, Concerns over health and safety, or any form of bullying or harassment, etc.
- Grievances pertaining to the Contractor's internal policies, any conflicts with respect to the style of working of the Contract Workers and gap in expectations of the Contractor, etc.
- Concerns related to the Company policies as may be applicable to individuals other than employees.
- Grievances pertaining to any adverse impacts from the Company's operations on community assets or resources or on Vulnerable Groups such as impact on the community's water supply system, damage to crops and livestock, or damage to any private property or village structures from movement of vehicles, amongst others.
- The conflict between any employees or Contract Workers engaged during the Company's operations and the local community.
- Behaviour or unethical practices of an Internal Stakeholder.
- Any other issues relevant to the Company's routine operations.

8 Exclusions

Grievance pertaining to or arising out of the following shall not come under the purview of this document:

- Matters related to salary, allowances, hours of work and other benefits, hours of employment, overtime, and incentive-related issues;
- Matters related to disciplinary procedures;
- Conflicts outside Company premises that are personal in nature between Company's employees and local communities or an External Stakeholder;
- Company's decision on transfers, promotion, demotion, and discharge on disciplinary grounds (as the same can be taken up and resolved with the employee's line manager);
- Annual performance appraisal (to be taken up and resolved with the employee's line manager);
- Any Grievance arising out of the removal or dismissal of an employee;

- Any matter relating to terms and conditions of appointment settled prior to joining or appointment;
- Matters covered by the Anti-Bribery and Anti-Corruption Policy, Anti-Money Laundering/ Combating the Financing of Terrorism Policy, Vigil Mechanism and Whistleblower Policy, POSH or any other policies of the Company;
- Criminal and violent activities (*to be dealt with as per Applicable Laws*);
- Commercial Disputes (*to be dealt with as per the dispute resolution mechanism under the respective contracts*); and
- any other matter as may be decided by the Company in its sole discretion.

9 Non-Retaliation

The Company prohibits retaliation and does not allow reprisals of any kind against anyone who reports a Grievance, Concern or Complaint in good faith. The Company through this GRM undertakes that Internal or External Stakeholders will not be penalized or be subject to any form of harassment or discrimination formally or informally for voicing a genuine Grievance, Concern or Complaint with the Company in a reasonable, business-like manner or for voicing their Concern, Complaint or Grievance through this Grievance Redressal Mechanism. Retaliation in any form against any stakeholder utilizing this Grievance Redressal Mechanism is not considered to be an acceptable practice by the Company and will be subject to appropriate disciplinary action.

10 GRM Communication

The Company will ensure that this GRM is made available to all Internal Stakeholders by saving the same in the Company's SharePoint. Every new employee will be introduced to all the codes and policies of the Company including this GRM as part of their induction. In addition, to enable External Stakeholders to have access to the GRM and seek redressal under the same, the Company will also display the GRM on its notice board across all offices and asset locations.

11 Grievance Redressal Committee

The Company has constituted a Grievance Redressal Committee (hereafter referred to as "GRC") to review, assess, investigate, redress and advise the Grievance Coordinator on the conclusion on behalf of the Company to enable the Grievance Coordinator to complete the closure formalities stipulated under this GRM.

Unless otherwise amended, the GRC will comprise of the following members:

- General Counsel & Chief Compliance officer of the IM
- Legal Counsel of the IM
- Corporate Controller of the IM
- Company Secretary of the IM

At least three members are required to constitute a quorum. In case the Grievance or Complaint or Concern is against or involves any of the members above, such members will recuse themselves from participating in the proceedings involving such member(s). In case more than one member needs to recuse themselves, the CEO and CFO of the IM will replace the members recusing themselves from the meeting. Additional members of the team across Companies may be invited by the GRC to join the meetings to aid the assessment. For e.g.: on an HR matter, the Head-HR (so long as the individual is not conflicted) may be requested by the GRC to join the meeting to enable the GRC to assess the case in hand.

12 Submission procedure

A Grievance or Complaint or Concern shall always be required to be submitted in writing except under exceptional circumstances whereby specifically at an asset location a stakeholder may communicate the same verbally to the Site In-Charge and the same may in turn be recorded in writing and reported by the Site In-charge. The submissions are generally not expected to be anonymous (again except under exceptional circumstances owing to specific sensitivities) to ensure that the Grievance Coordinator is able to circle back on the Company's view and action taken, if any, upon the GRC concluding their assessment.

The submission could be made through four modes: 1) Complaint box available at a pre-designated location in each of the asset locations as well as at Company's offices; 2) email: grievance@seit.co.in; 3) Facility for calling on a toll-free helpline may also be provided by the Company, details of which will be published on the Company's website; 4) Courier or snail mail addressed to: The Company Secretary, Sustainable Energy Infra Investment managers Pvt. Ltd. Winchester, Cowrks, Hiranandani Gardens, Downtown Powai, Mumbai – 400 076.

The submissions made at the asset location Complaint box shall be collated by the Site In-charge and shared with the Grievance Coordinator at least once every month while the submissions in the Mumbai Complaint box will be collected by the Grievance Coordinator directly along with the Corporate Controller. Apart from the Grievance Coordinator no other person shall have access to the keys of the Complaint box in the Mumbai office while in case of asset locations only the Site In-charge shall have access to the keys. The Grievance Coordinator will acknowledge receipt of the submission in writing in cases where the submission has not been made on an anonymous basis.

13 Redressal process

The Grievance Coordinator shall collate all the submissions and call for a meeting and present the same to the GRC at least once every month. Depending on the seriousness of the submission or number of submissions, the Grievance Coordinator may call for a meeting and present the submissions at shorter intervals.

On receipt of the submission, the GRC will conduct the following steps, as applicable:

- i. Evaluate if the submission is a Grievance, Complaint, Concern or a Frivolous Complaint.
- ii. If the submission is evaluated by the GRC to be a Frivolous Complaint, the same shall be recorded accordingly. Disciplinary actions, where applicable, may be taken against stakeholders submitting Frivolous Complaints.
- iii. The GRC at its discretion may decide to adjudicate the submission on its own or decide to have the matter investigated further including through an external agency of repute depending on the nature of the submission.
- iv. All decisions of the GRC shall be recorded in writing and a record of the same shall be maintained by the Grievance Coordinator. Subject to Applicable Laws to the contrary, the decision of the GRC shall be final.
- v. The Grievance Coordinator will circle back to the person who has made the submission with the final decision of the GRC. The same shall be communicated in writing.

14 Reporting

The Grievance Coordinator in his capacity as Company Secretary to the IM and a Secretary to the EHS Committee (as defined in the ESG Policy of the Company) shall present a summary of material Grievances received under this code on a no name basis along with the decision of the GRC to the EHS Committee at the committee's scheduled meeting. This will ensure that the Company and its management have insights into issues impacting stakeholders thereby necessitating initiation of requisite steps to address systemic issues that could impact the sustainability of the business. While the MOM of the EHS Committee will be shared with the Board of the IM as per the requirements of the ESG Policy, the Company Secretary will ensure that material issues will also be presented to the Audit Committee

thus ensuring that systemic or material issues are reviewed at multiple levels including the GRC, EHS Committee, Audit Committee and the Board.

15 Training and Awareness

The Company shall provide trainings and create awareness through the training sessions as specified in the Environment & Social Management System implemented by the Company. The Company may also undertake other initiatives as and when it may deem appropriate.

16 Review of the Guidelines

The Company reserves the right to review, amend and cancel these guidelines at any time. Any exception/deviation or amendment to these guidelines requires endorsement of Corporate Controller, review by the General Counsel & Chief Compliance Officer and approval of the CEO.

Certified True Copy

Authorised Signatory

Name: Devjeet Ghosh

Designation: General Counsel and Chief Compliance Officer





Winchester, Ground floor, Cowrks, Hiranandani Gardens, Powai, Mumbai 400 076
www.seit.co.in