

## **1. Objective & Scope**

- 1.1 The purpose of this document is to ensure that the grievances/complaints of the employees must be redressed fairly and consistently.
- 1.2 This document is intended only as a statement of policy and management guidelines. It does not form part of individual employment contracts or have contractual or other legal effect. The Company reserves the right not to follow this Procedure where it considers it appropriate.
- 1.3 This policy applies to all employees and stakeholders in The Thal Industries Corporation Limited.
- 1.4 This policy is applicable for both the Mill and Agri sections.

## **2. Responsibility**

- 2.1 Site Head
- 2.2 Head HR
- 2.3 Grievance Handling Committee
- 2.4 Employees
- 2.5 Stakeholders
- 2.6 Office Superintendent
- 2.7 Site Agri Head

## **3. Grievance Handling Committee**

- 3.1 At the site, a grievance handling committee is formulated under the supervision of the Site Head. The formation of the committee is as follows:
  - Site Head – Committee Chairman
  - Head of Finance
  - Head of Administration
  - A representative from CBA (workers representation)
- 3.2 The Grievance Committee shall be responsible for ensuring that grievances are dealt with effectively by the Grievance Procedures set out for the implementation of this Policy. In doing so, the Committee shall adhere to the following principles

- Ensure that the system is effectively communicated to and understood by the affected parties, including illiterate parties or workers who speak a different native language.
- Take grievances seriously on board because the employee feels aggrieved, unhappy, or dissatisfied,
- Investigate the facts and surrounding circumstances, and show the employees that this has been done thoroughly and sensitively,
- Actively look for a solution that will satisfy the employee, where practical, without causing disproportionate difficulty for the organization or the Employee's colleagues,
- Ensure the anonymity of complainants, where requested by them, protecting them from risk of reprisal or intimidation. It also safeguards against non-disclosure rules set by the company.
- Provide feedback to the employee about what can, and cannot be done to resolve the grievance,
- Take necessary follow-up action
- Keep parties to a grievance informed of its progress, timeframe, and outcomes

#### **4. Grievance Handling Procedure**

##### **4.1 Complaint Boxes**

- 4.1.1 It is envisaged that the majority of routine grievances can be resolved on an informal basis. Therefore, the grievance should first be discussed with the employee's immediate manager who will investigate the matter in an attempt to resolve the issue on an informal basis.
- 4.1.2 If it is not appropriate to raise the matter informally, or if the employee does not receive a satisfactory outcome, the grievance should be made in writing to the Site Head setting out full details and put in the Complaint Boxes installed at different locations.
- 4.1.3 The Personal Assistant of the Site Head will open the complaints box on a fortnightly basis and collect all the complaints.
- 4.1.4 He will write down all particulars in the Grievances / Complaints Register (FRM/HR/030) and present it to the Site Head along with complaints.

- 4.1.5 The Site Head will make arrangements for the proper investigation of the grievance/complaint and hearing to be conducted by a concerned HOD or assigned manager or the case will be referred to the Grievance Handling Committee.
- 4.1.6 The hearing will normally be held within ten working days of receipt of the written grievance, although this may need to be extended depending on the length of the investigation and the availability of the appropriate manager.
- 4.1.7 Employees must take all reasonable steps to attend disciplinary meetings. However, the employee must notify the Company forthwith if they are unable to attend a meeting and a re-scheduled meeting will be arranged within (usually) 5 days of the date originally proposed for the meeting.
- 4.1.8 During the hearing, the person accompanying the employee may consult with the employee, and address the hearing, but may not answer questions on the employee's behalf.
- 4.1.9 Following the hearing, a written response will be given to the employee, normally within five working days.
- 4.1.10 If the employee is unsatisfied with the response, he may appeal in writing to the Site Head setting out full details. The Site Head will arrange for a further hearing to be conducted by a more senior manager than the manager responsible for the original decision or send it to the Head of HR in Head Office. Their decision will be final and there is no further appeal from this decision.
- 4.1.11 Following the hearing, a written response will be given to the employee, normally within five working days.
- 4.1.12 If the employee wishes to lodge a grievance after their employment has ended, the Company and the employee may either go through the hearing and appeals part of the Procedure, or the parties can agree to deal with matters based on a written grievance and response (without a hearing). The parties will discuss whichever option is easiest at the time.
- 4.2 Complaint Through Telephone/Message/WhatsApp**
- 4.2.1 Apart from complaint boxes, a mobile number is displayed at different site locations for logging a grievance/complaint.
- 4.2.2 The employee can call or drop SMS / WhatsApp on the given number with his name, designation, department, site, and details of the grievance/complaint.

- 4.2.3 All the complaints will be logged on the Grievances / Complaints Register (FRM/HR/030) and allocated to site heads for further investigation.
- 4.2.4 The site heads will direct the grievance to the concerned HOD or Grievance Handling Committee according to the nature of the grievance/complaint.
- 4.2.5 After investigation, the response will be shared with the complainant.
- 4.3 Grievances / Complaints from External Stakeholders (Customer/ Farmers/ Technical Suppliers, etc.)**
- 4.3.1 In case farmers have any grievance with mills regarding the price of sugar cane, fertilizer provision, services, mill staff behavior, etc. they can voluntarily register their complaint on the help desk number, provided at each farmer location.
- 4.3.2 The Mills Office superintendent or any person designated by the Head of AGRI, logs farmer complaints on the Grievances / Complaints Register (FRM/HR/030).
- 4.3.3 If the severity of the complaint is low and can be resolved through discussion with the farmer by the Agri field officer or relevant Agri Manager, then it will be marked to the designated officer for resolution as the majority of routine grievances can be resolved on an informal basis.
- 4.3.4 If the nature of the grievance/dispute is high and needs the involvement of the Agri head, such complaints will be sent to the respective Site Agri Head for further investigation and resolution.
- 4.3.5 If the nature of the complaint is critical or Agri department is a party or there is a conflict of interest, such complaint will be handled through the Grievance Handling Committee, which comprises the following members:
- (a) Head of Finance or designate
  - (b) Head of Internal Audit
  - (c) Head of Administration
  - (d) Designated person from the Agri Department
- 4.3.6 The designated person/committee will evaluate the root cause of the assigned complaint and take appropriate corrective action.
- 4.3.7 The Office Superintendent or designated person by the Head of Agri will note the suggested root cause and corrective action on the Grievances / Complaints Register (FRM/HR/030).

4.3.8 The Office Superintendent will be responsible for collecting the Complainant's feedback about satisfaction/dissatisfaction

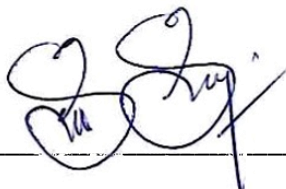
#### 4.4 **Right of Appeal for Unresolved Grievances/ Complaints**

4.4.1 If the Complainant/ Respondent is not satisfied by the actions taken by the Grievances Handling Committee(s), they have the right to appeal for access to independent legal or technical advice, or choose individuals or groups to support them and/or act as observers, as well as the option of a third-party mediator for proper resolution of the matter.

#### 4.5 **Confidentiality**

4.5.1 All the investigations and proceedings of the grievance handling will remain confidential.

4.5.2 All members of the Grievance Committee and those assigned for record-keeping, as well as any staff member questioned about an issue at hand, are bound to keep confidentiality at all times and hold in confidence, all documentation and information exchanged in the process.



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**SALMAN SHEHRYAR**  
CHIEF OPERATING OFFICER