COTTON CONNECT

REIMAGINING THE FUTURE FOR SUPPLY CHAINS

HR POLICY

POLICY NAME: GRIEVANCE AND COMPLAINTS POLICY

REFERENCE NO.: HR/CCSA/GP/09/2024

POLICY VERSION: HR/GP/002

W.E.F: 2ND SEPTEMBER 2024

Date	Policy Version No.	Approved By
1st March 2024	HR/GP/001	Abhishek Nambiar (Chief People Officer)
2nd September 2024	HR/GP/002	Abhishek Nambiar (Chief People Officer)

TABLE OF CONTENT		
S. No.	**Policy Content**	**Page No.**
I	**Introduction**	**3**
II	**Objectives**	**3**
III	**Scope**	**3**
IV	**Policy Statement**	
V	**Grievance & Complaints Policy**	**3**
1.	**Definitions and Meaning**	**3-4**
2.	**Complaint and Grievance Redressal Systems**	**4**
3.	**Kinds of Grievance/complaint**	**5-7**
4.	**Mode of Filing Informal Complaint or Formal Grievance**	**7**
5.	**Redressal Process**	**7-10**
6.	**Rights of the Parties**	**10-11**
7.	**Confidentiality**	**11**

I. INTRODUCTION

This Grievance & Complaints Policy ("**Policy**") is made available to all the Stakeholders (*defined below*) of CottonConnect South Asia Private Limited (hereinafter referred to as the "**Company**" or "**CottonConnect**" or "**We**" or "**Us**" or "**Our**").

CottonConnect recognizes the importance of providing a supportive environment where Stakeholders feel empowered to address grievances and complaints related to unjust treatment, harassment, and health and safety in the workplace. In line with our commitment to fostering a fair, ethical and inclusive workplace culture, this Policy has been developed to establish a structured framework for addressing the grievances and complaints of Stakeholders effectively.

We aim to ensure that every Stakeholder's voice is heard and that all individuals working with CottonConnect are treated with dignity, respect, and equality throughout the redressal process.

If you have difficulty at any stage of this policy because of a disability or because English is not your first language, you should discuss the situation with your manager or the HR team as soon as possible.

II. OBJECTIVES

The objective of this Policy is to:

(a) explain the scope and definition of grievances and complaints;

(b) define the Company's confidentiality measures;

(c) provide for a clear redressal process;

(d) explain the rights of Complainant and Respondent; and

(e) address Stakeholder concerns effectively in the shortest possible time.

III. SCOPE

This Policy applies to all individuals affiliated with the Company, including consultants (both full-time & part-time), farmers, seasonal workers, local partners, customers and other stakeholders associated with CottonConnect as may be identified by CottonConnect from time to time (hereinafter individually referred to as "**Stakeholder**" and collectively referred to as the "**Stakeholders**"). This policy can also apply to employees across all positions and locations. The Company reserves the right to use alternative grievance procedures as applicable to the employment relationship and legalities in the countries in which we operate and as most suitable to the employee concerns.

IV. POLICY STATEMENT

At Cotton Connect, we are committed to fostering an ethical working environment where all Stakeholders feel respected, valued, and supported. Our principles guide us in creating a workplace culture that prioritizes fairness, transparency, and collaboration.

It is the responsibility of all Stakeholders to carefully review this Policy and familiarize themselves with the redressal process in order to ensure effective conflict resolution and uphold our values.

Resolving grievances and complaints purposefully not only benefits the organization and its people but also reinforces the harmony and rapport among all Stakeholders. Therefore, it is imperative to address such matters assertively, tactfully, and empathetically to maintain a healthy work environment.

This Policy is designed to establish an efficient process for resolving serious issues wherever feasible, ensuring that it aligns with the resources and boundaries of the Company. By adhering to this Policy, we aim to instil a disciplined approach that guarantees consistent and fair treatment of all Stakeholders.

It is the responsibility of each Stakeholder of CottonConnect to extend assistance, cooperation and support in the implementation of this Policy. This support may include guiding colleagues towards the policy or appropriate person to help them address concerns; providing evidence as part of an investigation and reporting unacceptable behaviour promptly and confidentially, in alignment with our commitment to ethical conduct and a supportive work environment.

V. GRIEVANCE AND COMPLAINTS POLICY

1. Definitions and Meaning

1.1. "**Grievance**" refers to a legitimate written grievance raised by a Stakeholder which is a serious allegation or concern or any such issue which remains unresolved under Informal Complaint Management System, relating to matters outlined under this Policy.

1.2. "**Informal Complaint**" refers to a concern raised by a Stakeholder concerning an action, treatment, behaviour, or condition perceived by a Stakeholder in relation to CottonConnect, as unfair or inappropriate, typically informal in nature and serves as a reason for dissatisfaction;

1.3. "**Complainant**" refers to any Stakeholder who raises a Grievance or Informal Complaint under this Policy;

1.4. "**Respondent**" refers to any individual against whom allegations have been made following the raising of a Grievance or Informal Complaint;

2. Complaint and Grievance Redressal Systems

An Informal Complaint and a Grievance are both forms of expressing dissatisfaction within the workplace, but they differ in their formality, scope and redressal. In this regard, we have created a dual redressal system and framework to address the disputes of Stakeholders effectively.

2.1. Initial assessment and investigation:

Upon receipt of any information from the Stakeholder, an initial assessment upon the veracity, facts and parties involved is undertaken by CottonConnect. This assessment will be conducted by a senior HR representative and may involve further informal investigation with the Stakeholder. Based on the result of such assessment, the charge levelled by a Stakeholder is designated either under the Informal Complaint Management System or Grievance Redressal Management System. The decision of CottonConnect in this regard shall be final and binding on the Stakeholders.

2.2. Informal Complaint Management System:

Any Informal Complaint shall be treated under the Informal Complaint Management System by CottonConnect wherein the Complainant and Respondent in the presence of an authorized official of CottonConnect shall be given an opportunity to amicably resolve the Informal Complaint amongst themselves.

An Informal Complaint Management System is designed to provide a platform for Complainants to address their concerns and disputes in a swift and amicable manner. This system allows individuals to bring forward their complaints through informal channels, such as discussions with supervisors or managers, with the aim of resolving issues promptly and effectively. The system operates within a 30 biz days timeline to ensure timely resolution of complaints.

However, if a dispute remains unresolved to the satisfaction of the complainant within this timeframe, it will be referred back to the senior HR representative who can determine either the closure of the issue, an alternative redress or escalation to the formal Grievance Redressal Management System. This ensures that unresolved grievances receive proper attention and are handled through a structured process to achieve fair and equitable outcomes.

2.3. **Grievance Redressal Management System:**

Under the Grievance Management System established by CottonConnect, any complaint escalated from the Informal Complaint Management System or directly submitted/accepted as a Grievance shall be addressed.

Having determined in the initial assessment that there are substantial matters to address, the Senior HR representative will expand their informal investigation into a thorough and impartial formal investigation, ensuring the involvement of relevant parties and gathering necessary evidence. There may be occasions when the HR representative assigns the investigation to a local manager or representative who is better placed to meet with the relevant individuals. The investigation shall be completed within a reasonable timeframe, and the outcome will be communicated to the Complainant, along with recommendations on the next appropriate step (see below for the further process) which is most likely to be a grievance meeting.

3. **Kinds of Grievance**

For the purpose of the Policy, the following Grievances are covered by the Company's Grievance Redressal Mechanism aimed at fostering equal opportunity, safe, and ethical work practices:

3.1. Team Related Grievances:

1) Conflict of interest;
2) Instances of misbehaviour or inappropriate behaviour in the workplace;
3) Any form of discrimination, racism or harassment;
4) Complaints under anti-bribery and corruption; and
5) Complaints under safeguarding protocols.

3.2. Employment-related Grievances

1) Issues concerning pay and working conditions;
2) Terms of employment and workplace rules & regulations;
3) Disputes or disagreements with co-workers; and
4) Allegations of unfair treatment at work.

3.3. Farmers

1) Matters concerning farmers' training information;
2) Misbehaviour by team members from CottonConnect or local partners;

3) Instances of providing misleading information to farmers, unrelated to the project;
4) Conflicts of interest in business and financial matters; and
5) Complaints under safeguarding protocols.

3.4. Local Partners and their Teams:

1) Complaints related to POSH;
2) Issues regarding minimum wage and salary;
3) HR-related concerns;
4) Instances of child labour and forced labour;
5) Misbehaviour by team members; and
6) Complaints under safeguarding protocols.

3.5. Customers:

1) Business and misleading information;
2) Misbehaviour by CottonConnect team members;
3) Complaints related to POSH;
4) Complaints under safeguarding protocols; and
5) Instances of financial misappropriation.

3.6. Other Stakeholders (Third Party and Vendors):

1) Cases of financial misappropriation;
2) Requests for bribes (under Anti-Bribery and Corruption policy);
3) Demands for gifts and favors;
4) Complaints related to POSH; and
5) Complaints related to health, safety, and security.

[***Note:*** *Please be informed that CottonConnect has established Whistleblower Policy (Ref No.* HR/CCSA/WBP/09/2024*) to enable all Stakeholders to report any concerns they may have regarding the Company. We have also established a POSH (Prevention of Sexual Harassment) committee under the POSH Policy (Reference No.* HR/CCSA/POSH/04/2019*), specifically designed for employees, staff members, third parties associated with the Company to raise complaints related to any form of sexual harassment in the workplace. We strongly encourage all Stakeholders to utilize the resources and procedures outlined in these policies when raising concerns or*

complaints. Your well-being and safety are our top priorities, and we are committed to fostering a safe and respectful work environment for all]

4. **Mode of Filing Informal Complaint or Formal Grievance**

The Complainants can submit their Grievances/Informal Complaints with the help of multiple channels. All the channels for Grievances or Informal Complaints are accessible to all the Stakeholders. Complaints will be received via these channels by the HR team and details will remain confidential.

4.1. **CottonConnect website**: Under the '**Get in touch'** page of the CottonConnect website there is an option for raising a grievance, and the **speakup@cottonconnect.org** email address. This is open and accessible for all the Stakeholders.

4.2. **Direct email:** Grievances can be raised by directly sending an email to **speakup@cottonconnect.org**

4.3. **Letter/courier**: Grievances can also be raised by sending a letter to the respective country address mentioned on CottonConnect website and address mentioned on the educational brochure.

4.4. **Direct Phone Call or what'sapp**: Stakeholders can contact through call or what'sapp at +91 9311837233;

4.5. The Subject line of the Email ID should be <**Formal Grievance Submission:** [Brief Description of Grievance]>; following are some examples of brief descriptions of grievances that may be used for the subject line of the email:

4.5.1. "Harassment Complaint"
4.5.2. "Workplace Discrimination"
4.5.3. "Workplace Safety Concern"
4.5.4. "Breach of Company Policy"
4.5.5. "Conflict with Colleague"
4.5.6. "Managerial Misconduct Claim"
4.5.7. "Unfair Treatment Issue"
4.5.8. "Workload Overload Dispute"
4.5.9. "Payment Discrepancy Complaint"
4.5.10. "Bullying Incident at Workplace"

5. **Redressal Process**

5.1. **Step-1: Dealing with Informal Complaints Amicably**

1) Stakeholders are encouraged to try and resolve minor disagreements and disputes amicably.

2) Minor misunderstandings, differences of opinion, or small-scale conflicts that have little impact on work performance or relationships are some examples of non-critical disputes. These disputes can often be addressed through open communication, cooperation, and mutual understanding among involved parties.

3) However, disputes involving harassment, discrimination, safety concerns, or violations of Company policies should be addressed through the formal grievance process outlined in subsequent steps.

4) If any Stakeholder is unsure about the criticality of a dispute or disagreement, they are encouraged to seek guidance from trusted line managers or the Human Resources department. In cases where discussions with the relevant party do not yield satisfactory results, Stakeholders are welcome to proceed directly to step 2.

5.2. **Step-2: Dealing with Formal Grievances**

1) The Stakeholder should document their grievance in writing and lodge it as per the procedure outlined under para 4 (Mode of Filing Formal Grievance).

2) The Formal Grievance submission should focus on presenting the facts of the Grievance raised with a clear explanation of the Stakeholder's concerns. This should include a brief description of the nature of the complaint, dates and names of individuals involved, including any witnesses. If there is relevant documentation, this should be included. The Complainant must refrain from using insulting or abusive language.

3) The designated person within the HR team shall promptly acknowledge the Formal Grievance email and confirm the next steps for the investigation in writing back to the Stakeholder.

4) The amount of any investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from witnesses and reviewing documents. The investigation will involve hearing from both parties i.e., the Complainant and the Respondent. Stakeholders must co-operate fully and promptly with an investigation.

5) On completion of the investigation, the Complainant and the Respondent will be informed of the outcome and arrangements for a grievance hearing. If the investigation determined that the grievance was not substantiated or

the facts were not forthcoming, they will be informed that the grievance is closed with no further action.

5.3. Step-3 Grievance Hearing

1) The designated person will arrange a grievance meeting with the Complainant, usually within 7 (Seven) working days of the completion of the investigation. The designated person will be a manager, Director or other appropriate Stakeholder who is capable of conducting a grievance procedure. Ideally the same person will see through the entire process from investigation to completion, but this is not always possible. A senior HR representative will support them at the meeting.

2) The minutes of this meeting will be recorded in writing to ensure accurate documentation of the discussions and resolutions proposed.

3) The purpose of a grievance meeting is to enable the Complainant to explain their grievance and assist CottonConnect in reaching a decision based on the available evidence. Both the Complainant and Respondent will have the opportunity to put forward any relevant information at the meeting and may call witnesses.

4) The designated person hearing the grievance and the HR representative will reach a decision based on the evidence whether the grievance is upheld. They will write to the Complainant, usually within seven days, to inform them of the outcome and any further action that will be taken to resolve the issue. They will also remind them of their right to appeal against the outcome if they are not satisfied.

5) They will also reach a decision on any action that is required against the Respondent and the severity of any formal action taken shall be determined

by the outcome of the grievance and the seriousness of any breaches of conduct.

6) Disciplinary action against the Respondent will be conducted under the relevant procedure and with the involvement of the appropriate manager, director or Stakeholder.

7) The designated person shall provide the Complainant with confirmation of a disciplinary decision against the Respondent within 30 (Thirty) days from the conclusion of the grievance process. Disciplinary action is not the only potential outcome and training, or mediation processes may also be applicable and will be confirmed to the Complainant.

5.4. **Step-4 Appeal:**

1) If either the Complainant or Respondent is not satisfied with the decision and wish to appeal against a formal grievance meeting outcome, they must submit the appeal within 15 (fifteen) working days to the Chief People Officer.

2) The Chief People Officer will convene to hear all appeals from both the Complainant and the Respondent and will subsequently provide recommendations.

3) In cases deemed appropriate or of significant severity, the Chief People Officer may opt to consult with the C.E.O/C.O.O before making a final decision.

4) The decision made by the Chief People Officer will be communicated in writing to both the Complainant and Respondent, and it will be considered final.
5) If the Respondent wishes to appeal against a disciplinary penalty, then they will have the right to appeal under that procedure.

6) Please note that the appeal request should clearly specify the grounds for the appeal. The appeal should be raised only under the following grounds:

- The seriousness of the disciplinary action.
- The filing of an unfounded or malicious complaint against the Respondent.
- Allegations of partiality or bias during the grievance process.

6. Rights of the Parties

6.1. Rights of the Complainant

The Complainant in a grievance proceeding is entitled to certain rights to ensure their concerns are addressed effectively and respectfully:

1) **The right to be heard:** The Complainant has the right to have their Grievances heard and considered in a timely and respectful manner.

2) **The right to confidentiality:** The identity of the Complainant and any information provided during the Grievance process shall be treated with strict confidentiality to protect their privacy and prevent retaliation.

3) **The right to protection against retaliation:** The Complainant shall be safeguarded against any form of retaliation or adverse treatment as a result of raising a Grievance in good faith.

4) **The right to support:** The Complainant may seek support and guidance from their manager or the HR team throughout the grievance process.

5) **The right to appeal:** If the complainant is dissatisfied with the outcome of the grievance process, they have the right to appeal the decision within the specified timeframe and in accordance with the established appeals procedure.

6) **The right to a fair and impartial process**: The complainant shall be treated fairly and impartially throughout the grievance process, with due consideration given to their rights and perspectives.

6.2. Rights of Respondent:

The Respondent in a Grievance proceeding is entitled to certain rights to ensure a balanced and impartial resolution process:

1) **The right to be informed:** The Respondent has the right to be informed of any Grievance raised against them, including the nature of the allegations and the specific details of the grievance.

2) **The right to respond:** The Respondent shall have the opportunity to provide their side of the story and present their defense during the grievance hearing process.

3) **The right to representation:** The Respondent may choose to be accompanied by a colleague or manager of their choice during any meetings or hearings related to the Grievance.

4) **The right to appeal:** If the Respondent disagrees with the outcome of the Grievance process, they have the right to appeal the decision within 7 (seven) working days and in accordance with the established appeals procedure under this Policy.

5) **The right to confidentiality:** Any information provided by the Respondent during the Grievance process shall be treated with confidentiality and used only for the purpose of resolving the Grievance.

6) **The right to fair treatment:** The Respondent shall be treated fairly and impartially throughout the Grievance process, with due consideration given to their rights and perspectives.

7. Confidentiality

1) Confidentiality of all the persons involved in the Informal Complaint Management System and Grievance Redressal Management System including those assigned for record-keeping, as well as any Stakeholders questioned in relation to an issue at hand, are bound by the duty of confidentiality at all times and hold in confidence, all documentation and information exchanged in the process.

2) Grievances will be treated with utmost confidentiality and sensitivity.

Reviewed By:	**Approved By:**
	Abhishek Nambiar
HR Department	Chief People Officer