

NALWA SONS INVESTMENTS LIMITED

CIN:L65993DL1970PLC146414

Corporate Office: Jindal Centre, 12, Bhikaiji Cama Place, New Delhi – 110066

Registered Office: 28, Najafgarh Road, Moti Nagar, Industrial Area, New Delhi-110015

Branch Office: O.P. Jindal Marg, Hisar-125005, Haryana

T: +91 11 45021854, 45021812 E: investorcare@nalwasons.com

Website: www.nalwasons.com

STAKEHOLDER GRIEVANCE POLICY

(Approved by the Board of Directors on May 30, 2023)

1. Objective

Nalwa Sons Investments Limited (hereinafter referred to as "NSIL" or "the Company") has adopted this policy to strengthen relationship with stakeholders by effectively addressing any grievances in a timely manner.

2. Scope and Applicability

Stakeholder grievance redressal policy is applicable to external stakeholders viz. suppliers, business partners, customers, communities and NGOs (hereinafter the "Stakeholder(s)").

For shareholder / debenture holders/ investor grievances, refer Investor Grievance Policy.

Internal stakeholders (such as employees & workers) should submit any grievance through internal grievance mechanism.

3. Definition

- **Grievance:** An issue or concern, that an affected individual or a group wants to be addressed by the Company.
- **Internal Stakeholders:** Individuals or groups who work directly within the business, such as employees and workers.
- **External Stakeholders:** Individuals or groups outside a business who are not directly employed by the business but are affected in some way from the decisions of the business, such as customers, suppliers, business partners, communities and NGOs.

4. Grievance Reporting Channel

Stakeholders may register their grievance / complaints at investorcare@nalwasons.com.

5. Grievance Handling Mechanism

Grievance handling mechanism is defined based on the principles of legitimacy, accessibility, predictability, equitability, and transparency.

Each Grievance will be treated according to the following procedure:



- Upon receipt of grievance, acknowledgement will be sent to the relevant stakeholder and where required additional preliminary information will be sought from the stakeholder.
- The grievance would be forwarded to the relevant department to receive necessary information and documents related to the grievance. Investigation would be undertaken to analyse the root cause of the grievance and potential corrective action plan.
- Following the investigation, the findings will be used to create an action plan outlining steps to be taken to resolve the grievance.

- Once the actions have been implemented and the team believes the grievance has been resolved, the resolution would be communicated to the stakeholder.

6. Roles and Responsibilities

Role/ Position Title	Responsibility
Grievance Officer	<p>The Grievance Officer shall be entrusted with the following responsibilities which inter-alia includes:</p> <ul style="list-style-type: none"> • Investigating the grievance • Developing actions and a resolution to resolve issue. • Responsible for assigning actions, monitoring actions undertaken and ensuring the timelines are met.
Stakeholder Relationship Manager for every department	<ul style="list-style-type: none"> • An employee that manages communication related to the grievance with the stakeholder and is responsible for keeping the stakeholder informed during the process. • The Stakeholder Relationship Manager would liaise with internal stakeholder to monitor progress of investigation and resolution.
Employees	<ul style="list-style-type: none"> • Provide requisite details to the Grievance Officer. • Provide additional information to support the investigation and close out of grievance where needed. • Embed preventive action plan into business processes, where required

7. Appeal

If the external stakeholder is not satisfied with the resolution or does not agree with the proposed actions, then the Stakeholder Relationship Manager needs to escalate the matter to the respective functional head. The Grievance Officer will review the grievance & all documentation gathered throughout the investigation and determines whether further actions are required to resolve the grievance.

8. Transparency and Disclosure

In line with the commitment to transparency and to maintain stakeholder confidence, NSIL publicly disclose the information about the stakeholder grievances in the Annual Report and Business Responsibility and Sustainability Report (BRSR).

9. Review

The policy will be periodically reviewed by the Company keeping in view the statutory requirement & need of the organization and recommend it to the Board for approval.