

DOC# JKSMML/Policies/HR/006

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JK SUGAR MILLS PVT LTD UNIT-1



GRIEVANCE MECHANISM

Table of Contents

1. INTRODUCTION	2
2. SCOPE	2
3. TERMS/DEFINITIONS	2
4. GRIEVANCE REPORTING CHANNELS	2
5. ROLES AND RESPONSIBILITIES	3
6. GRIEVANCE MECHANISM PROCESS	3
6.1 Receive Grievance	5
6.2 Record	5
6.3 Screen	5
6.4 Acknowledge	5
6.5 Investigate	7
6.6 Act	7
6.7 Follow up and close out	7
7. APPEAL	7
8. REPORTING	7
9. STORING OF GRIEVANCES	7

1. INTRODUCTION

The purpose of this document is to formalize the management of grievances from JK-1 stakeholders to minimize risks to the business. The grievance process outlined in this document provides an avenue for stakeholders to voice their concerns and ensures transparency in how grievances will be managed.

The grievance mechanism shall be based on the effectiveness criteria of the United Nations Guiding Principles (UNGP) on Business and Human Rights, ensuring it is legitimate, accessible, transparent, rights-compatible and a source of continuous learning.

2. SCOPE

The grievance mechanism procedure applies to all internal, external and vulnerable stakeholders identified for mill and registered Agri farms.

3. TERMS/DEFINITIONS

Grievance: An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the company in a formal manner.

Grievance Mechanism: A formalized way to accept, assess, and resolve stake holders complaints, concerning performance or behavior of the company, its contractors, or employees, includes adverse supply chain, environmental and social impacts.

Internal Stakeholders: Groups or individuals within a business who work directly within the business, such as employees.

External Stakeholders: Groups or individuals outside a business who are not directly employed or contracted by the business but are affected in some way from the decisions of the business, such as customers, suppliers, community and the government.

Vulnerable Stakeholders: Stakeholders who are at a higher risk of being negatively affected by the actions or decisions of an organization, industry, or project due to their lack of power or resources such as Religious Minorities, Women, Indigenous people and Disable persons.

4. GRIEVANCE REPORTING CHANNELS

JK-1 will communicate this procedure to its internal and external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external and internal stakeholders to voice their grievances include:

For Mill Site:

- Telephone: Stakeholders can contact to officers as follows
 - PA to General Manager Plant: at +923377808397 ext. 97; or
 - Dy General Manager Admin: at +923377808397 ext. 97; or mill ext no: 230
- Email: Grievances can be sent to raheel@jksugarmills.com
- Complaint Box: Stakeholders can complete a grievance form and put in complaint box fixed at different places in mill.

For Agri. Side

- Complainants can contact to grievance officers as follows
- Office Superintendent Cane department: 03006904278
- Office Superintendent Cane department: 03017201619
- Complaint Box: Stakeholders can complete a grievance form and put in complaint box fixed at different places in cane department and Yard.

5. ROLES AND RESPONSIBILITIES

Roles	Responsibilities
Stakeholder Contact Officer	<ul style="list-style-type: none"> • Receive grievances and assign a grievance owner. • Ensure the grievance mechanism procedure is being followed correctly. • Liaise with the external and internal stakeholder(s). • Maintains grievance register and monitor any correspondence. • Monitor grievances and report findings to General Manager. • Raise internal awareness of the grievance mechanism among employees and contractors. • Fully aware and trained about Grievance mechanism • Should be aware about grievance confidentiality
Grievance Owner (GM Plant GM(Cane) Grievance Committee (GM, HODs)	<ul style="list-style-type: none"> • Investigating the grievance and liaising with the stakeholder contact officer. • Developing resolutions and actions to rectify any issues. • Follow up and track progress of grievance
Head Office Grievance Committee This committee need in case any stake holder haven't satisfy with the investigation of Plant Grievance Committee or if committee member have any grievance. In above both cases head office form a committee and solve grievance.	<ul style="list-style-type: none"> • Investigating the grievance and liaising with the stakeholder or with committee members. • Developing resolutions and actions to rectify any issues. • Follow up and track progress of grievance.

6. GRIEVANCE MECHANISM PROCESS Aligned with UNGPs business and Human rights

For grievances of a more serious or sustained nature, a formal grievance handling process may need to be accessed. When a formal grievance handling process is determined as required by the JK-1, it is characterized by the following features:

- **Confidentiality** – The issue is only discussed with those that have a genuine need to know. These individuals may include the parties directly involved in the incident, witnesses, those who make a decision on potential disciplinary action and those involved in the investigation.
- **Fairness** – Grievances will be fairly and impartially investigated with the view of a fair outcome for all parties.
- **Sensitivity** – Certain grievances may involve particularly personal information about the individuals involved. These revelations will be dealt with in a sensitive manner.

- **Resolution** – If a formal grievance processed is commenced it will be given the resources required to ensure that it is investigated and resolved in a timely.
 - **No Victimisation** – All parties (i.e. complainant, the person(s) complained about, and any witnesses) to a formal grievance will be advised that any form of victimisation or reprisal against any other party will result in immediate disciplinary action, which may include termination of employment.
 - **Conflict Resolution Mechanism:**
To ensure a fair, transparent, and supportive process for addressing grievances, the following measures are in place:
 - **Independent Legal and Technical Advice:** Complainants should have access to external legal or technical expertise, helping them understand their rights and the technical aspects of the situation, ensuring they are fully informed.
 - **Choice of Support Individuals or Groups:** Complainants are free to select individuals or groups to support them throughout the grievance process. This could include a trusted colleague, union representative, or community organization.
 - **Third-Party Mediator:** A neutral third party can act as a mediator if needed, facilitating discussions and helping both sides reach a fair resolution.
 - **Anonymity:** If a grievance is received anonymously, the Grievance owner will promptly address it after thorough verification in accordance with the established procedure, by ensuring that the anonymity is respected throughout the process. Any act of reprisal or intimidation against a complainant (requesting anonymity or otherwise) will be treated as misconduct and violation of human rights which may lead to disciplinary action against the person responsible.
 - **Language Accessibility:** All stakeholders will be informed of the grievance mechanism in their local language. Communication during the grievance process will also be conducted in languages understood by the stakeholders to ensure clarity and inclusiveness.
- Non-Retaliation and Impartiality:** JK Mill ensures that employees, growers, or other stakeholders who raise a grievance will not face any adverse effects on their promotion, work assignments, duties, working hours, or other aspects of their role. This commitment applies regardless of whether the grievance is directed at a senior, head of department (HOD), or farm owner. The organization is dedicated to maintaining an impartial and retaliation-free environment to encourage transparent and open communication.
- **Legitimacy:** The grievance mechanism is structured to enable trust and accountability, ensuring fair handling and impartial resolutions. Roles and responsibilities are clearly defined, with grievance owners held accountable for fair and ethical conduct throughout the grievance process.
 - **Predictability:** A transparent, clear procedure is outlined with indicative time frames for each stage, from receiving to resolving grievances. This predictability helps set clear expectations for stakeholders on how their grievances will be managed.
 - **Equitability:** The mechanism ensures that aggrieved parties have reasonable access to information, advice, and expertise necessary to participate in the grievance process. For example, complainants may seek independent legal or technical advice and select support individuals or groups to assist them.
 - **Rights Compatibility:** Outcomes and remedies will align with internationally recognized human rights standards. This ensures that resolutions address grievances fairly and uphold stakeholders' rights.
 - **Continuous Learning:** Grievances and outcomes are reviewed periodically to

identify patterns, lessons, and areas for improvement in the process. Updates to the grievance mechanism are implemented as necessary to prevent future grievances and enhance its overall effectiveness.

- **Engagement and Dialogue:** The grievance mechanism is designed and periodically reviewed with input from relevant stakeholders. Emphasis is placed on dialogue and open communication to resolve grievances collaboratively.
- **Protection and Anonymity of Whistleblowers**

JK Sugar Mills (Pvt.) Ltd. is committed to fostering a culture of openness and transparency, where individuals feel safe to report concerns about violations of this policy or any unethical behavior without fear of retaliation.

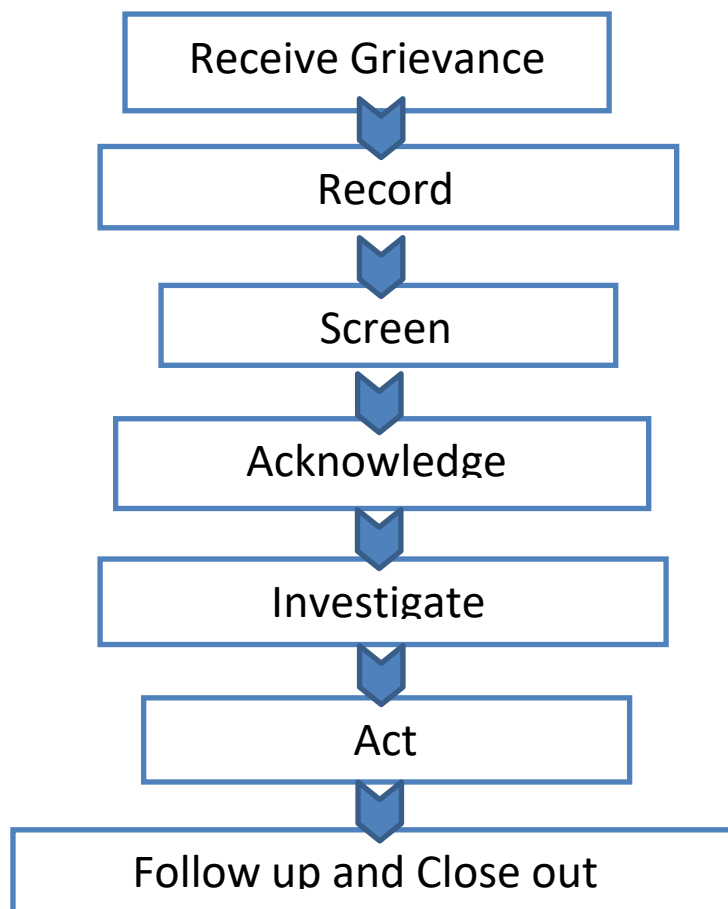
- **1. Protection of Whistleblowers**

- Non-Retaliation: JK Sugar Mills strictly prohibits any form of retaliation against whistleblowers who report concerns in good faith. Retaliatory actions, such as harassment, discrimination or termination, will result in disciplinary measures against those responsible.
- Support Mechanisms: Whistleblowers will have access to support from the Human Resources Department to address any challenges or concerns arising after reporting.

- **2. Anonymity of Whistleblowers**

- Confidential Handling: All reports, whether anonymous or not, will be handled with strict confidentiality. Information about the whistleblower's identity or the details of the report will only be disclosed to authorized personnel on a need-to-know basis for investigation purposes.

The flow chart below describes the grievance mechanism process to resolve any grievances:



6.1 Receive Grievance

Over the phone:

If a grievance is received over the phone, the stakeholder contact officer will complete a Grievance register Form for further processing.

Electronic:

The stakeholder contact officers receive all grievances that come through via email. The stakeholder contact officers will review the grievance form and process the grievance in accordance to this procedure.

Complaint Box:

The stakeholder contact officers receive all grievances that collect from complaint box. The stakeholder contact officers will review the grievance form and process the grievance in accordance to this procedure.

Formal and Informal way:

In formal way we follow the whole procedure mentioned below to solve any issue but in second way you can initially try to solve issue by contacting with other party to discuss problem and try to solve yourself.

6.2 Record

All formal grievances will be logged in the Grievance Register (Grievance register form) for record of correspondence.

6.3 Screen

Grievances will be screened depending on the level of severity in order to determine the grievance owner and how the grievance is approached. See below table categorizing the different levels:

No	Description	Grievance Owner
1	Repeated, extensive and high-profile grievances that may damage JK-1 reputation.	Managing Director/CEO/COO/GM
2	One of grievances that will not affect JK-1 reputation.	GM Plant, GM Cane
3	When an answer can be provided immediately and/or JK-1 are already working on resolution.	HODs, GMs

6.4 Acknowledge

A grievance will be acknowledged by the stakeholder contact officer, within five working days upon receipt of a grievance. Communication will be made either verbally or in written form.

6.5 Investigate

The grievance owner together with the stakeholder contact officer is responsible for investigating the grievance. The investigation may require the grievance owner to make site visits, consult employees, contact external stakeholders and complete other activities.

Records of meeting, discussion and activities need to be recorded during the investigation. Information gathered during the investigation will be analyzed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

6.6 Act

The grievance owner is responsible for assigning actions, monitoring actions undertaken and meets the deadlines. Once all actions have been completed and the grievance owner feels the grievance has been resolved, the grievance owner will then inform the stakeholder contact officer to further advise the external/Internal stakeholder/s via their preferred method of contact.

6.7 Follow up and close out

The stakeholder contact officer will contact the external/internal stakeholder/s four weeks after the grievance is resolved to verify that the outcome was satisfied and also gather any feedback on the grievance process.

If required, the stakeholder contact officer may need to follow up with the stakeholder on numerous occasions to confirm all parties are satisfied.

Categories	Grievances	Closing Time
Priority Level 1	Customers, Top Management, Workers (Mill workers, Religious Minorities, Disable and women workers) and regulatory bodies	2-4 Days
Priority Level 2	Contractors, Growers, Mill Management and surrounding Community	4-8 Days
Priority Level 3	Supplier, transporters	Week- 2 Week

If the number of days increases due to any valid reason the contact officer will inform to all involved stakeholders, provide justification for the delay and communicate the extended timeline for resolving the grievance.

7. APPEAL

If the stakeholder(s) are not satisfying with the resolution and/or does not agree with the proposed actions, then the stakeholder contact officer needs to bring the matter to the attention of the Managing Director who will review the grievance and documents gathered throughout the investigation and determine whether further actions are required to resolve the grievance.

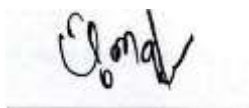
If JK-1 is unable to resolve a complaint or a stakeholder is not satisfied with the outcome, JK-1 may seek advice from other independent parties.

8. REPORTING

Information outlining the number of grievances, resolution time and outcomes of grievances will be reported to Management Representative on a monthly basis. JK-1 will evaluate and update the Grievance Mechanism procedure every years (or when required) to continually improve its stakeholder engagement.

9. STORING OF GRIEVANCES

All records, including grievance forms, investigation notes, and minutes of meetings will be securely stored on JK-1 office with suitable encryption to ensure privacy and confidentiality is maintained for all parties involved.



Prepared By



Approved By

ANNEX II GRIEVANCE REGISTER

