Grievance Redressal Policy for External Stakeholders

Version 1.0

Approval and Effectiveness

This Policy was reviewed and approved by the Board of Directors of Saatvik Green Energy Limited during its meeting held on 11th December 2025. The Policy is effective from the same date and shall remain in force until amended or replaced by the Board/ ESG Council of Saatvik.

1. Policy Statement

Saatvik Group is committed to conducting business ethically, transparently, sustainably, and responsibly. We recognize that our operations and supply chain may have impacts, real or perceived, on external stakeholders (vendors, sub-vendors, service providers, customers, affected communities, etc.).

We are committed to providing accessible, fair, and transparent mechanisms for all external stakeholders to raise grievances, request redress or remediation, and ensure that these are addressed promptly, impartially, and without retaliation.

This External Grievance Redressal Policy (the "Policy") aims to fulfill Saatvik's accountability obligations under ESG, human rights, and stakeholder engagement standards and aligns with recognized good practice for operational-level grievance mechanisms and applicable sustainability reporting expectations.

The mechanism is supplementary to, and not a substitute for, judicial or regulatory remedies where stakeholders choose those routes.

Saatvik is committed to delivering high-quality, reliable, and safe solar products and services while ensuring that stakeholder feedback, queries, and grievances are handled with transparency, fairness, and continuous improvement in mind.

2. Objectives

The objectives of this Policy are to:

2.1. Provide a clear, accessible and trusted channel for external stakeholders (vendors, sub-vendors, communities, suppliers, customers, other third parties) to raise concerns, complaints or grievances related to our operations, policies, contractual performance, or any adverse social / environmental impacts. This includes issues connected to human rights, labor rights, ethics, supply-chain practices, products safety and alignment with our ESG commitments.

2.2. Ensure grievances are assessed, investigated, and resolved in a timely, impartial, and transparent manner.

2.3. Prevent recurrence by identifying root causes, systemic risks, and learning from grievances.

2.4. Build stakeholder trust, strengthen relationships and improve our operational and ESG performance.

2.5. Assure that use of this mechanism does not impede access to legal or regulatory recourse and provide an option to escalate unresolved cases to independent forums or oversight bodies where appropriate.

2.6. Address customer grievances and feedback effectively to strengthen product stewardship, improve service quality, and enhance customer satisfaction.

3. Scope and Applicability

This Policy, titled "Grievance Redressal Policy for External Stakeholders", is applicable across operations of Saatvik Green Energy Limited and its subsidiaries (collectively referred to as the "Saatvik Group" or "Saatvik").

3.1. This Policy applies to grievances raised by external stakeholders including:

- Vendors, suppliers, contractors, sub-vendors
- Local communities, affected persons
- NGOs, civil society organizations, other third parties
- Service providers, consultants, business partners
- Customers

3.2. Types of grievances may include, but are not limited to:

- Contractual performance disputes, delays or non-fulfilment
- Product quality or performance issues
- Delays in delivery or response
- Payment issues, pricing, non-compliance with terms
- Environmental or social issues (pollution, disturbance, safety, worker welfare)
- Human rights or labor rights concerns in supply chain
- Discrimination, harassment, or unfair treatment by our agents / third parties
- Breach of laws, ethics, codes of conduct

- Health or safety risks associated with the use of solar modules or systems
- Misrepresentation or inadequate information regarding products or services
- Any adverse impact or risk perceived to arise from our operations
- ESG-related concerns (e.g., carbon footprint, climate risk, biodiversity impact, supply chain transparency, product stewardship, data privacy & security)
- Concerns related to conflict mineral issues including mineral extraction, trade, handling and export in conflict-affected areas.

3.3. Exceptions / Exclusions

- Internal employee grievances (these should be addressed under the internal HR grievance mechanism)
- Grievances already resolved via a different legal or arbitration process, unless specifically submitted here
- Frivolous, malicious or duplicate grievances (after due screening)
- Grievances outside our jurisdictional/regional footprint or beyond the scope of our influence
- Grievances that lack sufficient detail for investigation

It is important to note that this system is not a substitute for existing legal processes or commercial contracts that contain their own dispute resolution clauses. This policy does not cover matters already under litigation or arbitration. In addition, grievances related to violations of human rights, labor rights, or ethical practices within Saatvik's operations and supply chain may also be raised under this system.

4. Basic Principles and Governance

This Policy has been developed in accordance with the following guiding frameworks, principles, and governance standards that underpin Saatvik's approach to ethical and responsible business conduct:

4.1. Business Responsibility and Sustainability Reporting (BRSR)

4.2. IFC Performance Standards (particularly PS1 on Assessment and Management of Environmental and Social Risks and Impacts),

4.3. UN Guiding Principles on Business and Human Rights (UNGPs),

4.4. ISO 26000 Guidance on Social Responsibility.

5. Guiding Principles

The grievance mechanism shall adhere to the following principles:

5.1. **Accessibility:** Multiple channels for lodging grievances (written, email, phone, in-person, web portal) in relevant local languages; low to no cost to complainants.

5.2. **Legitimacy / Impartiality:** The process should be seen as fair and independent, minimizing bias or conflicts of interest.

5.3. **Transparency & Predictability:** Clear procedures, timelines, communications, status updates.

5.4. **Confidentiality & Anonymity:** Stakeholders can lodge grievances anonymously or request confidentiality; their identity and information is protected.

5.5. **Non-retaliation:** No person raising grievance shall suffer retaliation, retribution or discrimination for doing so. This commitment applies equally to suppliers' and contractors' workers.

5.6. **Equitable & Proportionate:** Remedies should be in proportion to harm/impact, and fair to parties.

5.7. **Dialogue & Participation:** Engage the complainant in dialogue, hearing their side, offering opportunity to be heard or accompanied.

5.8. **Remedy & Closure:** Provide appropriate remedies (apology, compensation, corrective actions, changes in practices) and formally close grievances with agreement and documentation.

5.9. **Continuous Learning:** Capture trends, root causes and systemic issues and reflect learnings in policies and procedures.

5.10. **Right to appeal:** Not prevent complainants from using legal or regulatory avenues if not satisfied with outcomes.

6. Roles and Responsibility

Role	Responsibility
Chief Finance Officer (CFO) & Chief Human Resource Officer (CHRO)	Joint custodians of this Policy; oversight and alignment with governance.
Heads of Departments (HODs)	For grievances related to their functional area (e.g. operations, procurement, environment, legal), HODs will be part of the investigation, resolution, and follow-up process.
Grievance Redressal Committee (GRC)	A cross-functional committee (see section 6) that reviews serious/complex grievances, gives oversight, ensures fairness and final decisions.
Grievance Officer / Secretariat	A designated person or team responsible for intake, registration, tracking, coordination of investigations, communication with complainants.
Investigation Team / Subject Matter Experts	Experts from relevant departments (Procurement, Legal, Sustainability, Operations) who examine and propose resolution.
Internal Audit / Compliance / ESG Oversight	Periodically review the grievance mechanism's functioning, audit sample cases, provide recommendations.
All Employees, Vendors, Contractors	Must cooperate with grievance investigations, provide necessary information, support resolution.

7. Grievance Redressal Committee (GRC)

7.1. To enhance impartiality and oversight, a Grievance Redressal Committee (GRC) is constituted:

- Chair: CFO or CHRO (On rotation every year)
- Members: Heads of key functions (Procurement, Legal, Operations, ESG / Sustainability, Compliance, others)
- Secretary: Grievance Officer

7.2. Mandate of GRC:

- Review and approve (or reject) proposed resolution for significant, sensitive or escalated grievances
- Ensure decisions are consistent, fair, and align with policy principles
- Monitor systemic trends, root-cause analyses, recommend policy changes
- Oversee appeals and escalation
- Report (at periodic intervals) to executive leadership / board on grievance performance, unresolved issues, lessons learned.

7.3. GRC shall have a clear quorum, decision-making rules, and timelines defined. Quorum must include at least one independent member (internal audit / ESG advisor) for decisions on human rights or ESG-related grievances.

8. Grievance Redressal Mechanism / Process

8.1. Submission

- Stakeholder submits grievance via one or more channels (e.g. web form, email, postal mail, phone, in-person at designated offices). Official email id is grievance.ext@saatvikgroup.com where anyone can submit their grievance.
- Provide minimum information: complainant name/contact (or indicate anonymity), date, description of grievance, how/when it occurred, parties involved, evidence, expectation / desired remedy

8.2. Registration & Acknowledgement

- Grievance Officer logs the grievance in a secure grievance registry (assign unique reference number, date of receipt, categorization)
- Acknowledgment sent to complainant within a defined period including reference number, expected timeline for response

8.3. Preliminary Screening / Eligibility Assessment

- Determine whether grievance is admissible (within scope, not frivolous, not duplicative)
- If inadmissible, send explanation to complainant and close the case (with documented reason)
- If admissible, classify the severity / priority (e.g. low / medium / high)

8.4. Investigation & Fact Finding

- Convene subject matter experts, collect relevant documents, interview complainant, involved parties, witnesses
- If needed, site visits or third-party verification
- Maintain confidentiality, impartiality, opportunity for parties to present their perspective
- For grievances relating to communities, investigations will follow culturally appropriate engagement protocols (as per IFC PS1).

8.5. Propose Resolution / Remedy

- Based on investigation, draft a proposed resolution (corrective actions, compensation, process changes, apology, monitoring)
- For high or complex cases, escalate proposal to GRC for review and approval
- Seek feedback from complainant on whether remedy is acceptable

8.6. Decision & Communication

- Final decision (accepted, partially accepted, or rejected) is documented
- Communicate the decision to complainant (within prescribed timeline) along with reasoning, action plan, timeframes, and (if allowed) option to appeal
- Implementation / Follow-up
- Ensure implementation of corrective actions, monitor the outcomes
- Maintain dialogue with complainant during implementation
- If the complainant is not satisfied, further review / escalation or appeal may be initiated

8.7. Closure & Feedback

- Once agreed remedy is implemented and accepted, formally close the grievance
- Seek feedback from complainant (satisfaction, process feedback) through service calls
- Document closure and lessons learned

8.8. Monitoring, Reporting & Review

- Periodic reporting (quarterly, annually) on number, types, status and outcomes of grievances
- Analysis of trends, root causes, systemic issues
- Internal audit / compliance review, and periodic review of the grievance mechanism itself (to assess effectiveness)
- Update policy / procedures as needed

8.9. Timeline

- Acknowledgement: within 5–7 business days
- Eligibility determination: within 10 business days
- Investigation completed and proposed resolution: within 30 days
- Final decision and communication: within 45 days
- For complex cases, extension permissible with notification to complainant (with reasons)
- These timeline benchmarks mirror good practice in project-level grievance systems

9. Handling of Records & Data

All grievances will be documented and maintained in a standardized format to ensure consistency, transparency, and traceability. Each grievance will be assigned a unique reference number, and a record will be maintained (refer Annexure A).

9.1. Evidence must be collected and maintained in digital/hard copy formats, including emails, documents, photographs, meeting notes, and interview transcripts recorded during the investigation process.

9.2. Records will be updated at every stage of the grievance lifecycle (submission, review, investigation, resolution, and closure).

9.3. All records must be stored securely to maintain confidentiality while ensuring accessibility for authorized personnel.

10. Quantitative Commitments

10.1. Saatvik aims to achieve and maintain a complaint resolution rate of 100% within the committed timelines and reduce repeat complaints by 5% annually through corrective and preventive measures.

10.2. Ensure that 100% of external stakeholders are informed about the grievance redressal mechanism by FY 2027 through contractual communication, vendor onboarding, and customer touchpoints.

11. Review and Amendments:

This Policy shall be reviewed annually, or in the event of significant regulatory or operational changes, to ensure its continued alignment with best practices, stakeholder expectations, and legal requirements. Any amendments to this Policy shall be made in writing and will become effective upon approval of ESG Council of Saatvik.

Annexure A

Grievance ID	Date Received	Complainant Name / Organization	Contact Information	Stakeholder Type	Category of Grievance	Description of Grievance	Supporting Evidence	Department Concerned	Assigned To	Severity / Priority	Acknowledgement Date	Status	Resolution Proposed	Resolution Approved By	Final Decision Date	Complainant Feedback	Follow Up Actions	Closure Date	Remarks