



## GRIEVANCE REDRESSAL POLICY

Birla Cellulose is part of ‘Aditya Birla Group’, India’s first truly multinational corporation with global presence. The group is governed by its strong set of values and has a vision of creating value for its multiple stakeholders through its leadership in sustainable business practices.

Birla Cellulose produces a complete range of MMCF spanning all the three generations of fibres viz. viscose staple fibre (VSF), modal & lyocell.

Birla Cellulose comprises of pulp & fibre manufacturing operations of Grasim Industries Ltd., India; Thai Rayon Public Co. Ltd., Thailand; PT Indo Bharat Rayon, Indonesia; Birla Jingwei Fibres Co. Ltd., China; AV Group NB & AV Terrace Bay, Canada and Domsjo Fabriker AB, Sweden.

### 1. Introduction

The purpose of this document is to formalize the management of grievances from our stakeholders to minimize the social risks to the business. The grievance process, outlined in this document, provides an avenue for stakeholders to voice their concerns and offers transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

### 2. Scope

The grievance mechanism procedure applies to all external stakeholders of our operations. This procedure does not cover grievances raised by internal stakeholders, such as employees, who are to refer to company’s internal grievance process.

### 3. Definitions

| Term                         | Definition  |
|------------------------------|---|
| 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 Handling Mechanism | A way to accept assesses and resolve community complaints concerning the performance or behavior of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts.                       |
| Internal Stakeholders        | Groups or individuals within a business who work directly within the business, such as employees and contractors.   |
| 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, NGOs and the government. |

#### 4. Grievance Reporting Channels

Birla Cellulose will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Key channel for external stakeholders to vocalize their grievance can be done in following way:

##### Email

Please write to us on this email id: [bc.grievance@adityabirla.com](mailto:bc.grievance@adityabirla.com)

#### 5. Roles & Responsibilities

| Role / Position Title   | Responsibility   |
|---|--|
| Grievance Committee<br>(Team comprises of Function Heads of HRM, F&C and Environment) | <ul style="list-style-type: none"> <li>Employee investigating the grievance and liaising with the external stakeholder(s).</li> <li>Developing resolutions and actions to rectify any issues.</li> <li>Follow up and track progress of grievance.</li> </ul>   |
| Stakeholder Contact Officer<br>(Admin & Liaison Officer)                              | <ul style="list-style-type: none"> <li>Receive grievances and forward to Grievance Committee.</li> <li>Makes sure the grievance mechanism procedure is being adhered to and followed correctly.</li> <li>Maintains grievance register and monitor any correspondence.</li> <li>Monitor grievances/trends over time and report findings to the Committee.</li> <li>Document any interactions with external stakeholders.</li> </ul> |
| Employees<br>(Officers of CSR, IR, Admin & Environment)                               | <ul style="list-style-type: none"> <li>Receive grievances in person.</li> <li>Report grievance to the Stakeholder Contact Officer by lodging the Grievance Lodgment Form.</li> <li>May provide information and assistance in developing a response and close out of a grievance.</li> </ul>  |

#### 6. Grievance Redressal Process



##### a. Receive Grievance

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

##### b. Record

All formal grievances will be logged in the Grievance Register and Grievance Lodgment Forms will be saved in record of correspondence.

##### c. Screen

The stakeholder contact officer is responsible to liaise with the external stakeholder/s and work on a resolution. Grievances will be screened depending on the level of severity in order to determine and how the grievance is approached. See below table categorizing the different levels:

| Category | Description  | Grievance Owner           |
|----------|--|---------------------------|
| Level 1  | When an answer can be provided immediately and/or company is already working on a resolution (only formal grievances to be lodged in the External Grievance Register). | FLO / Stakeholder Officer |
| Level 2  | One off grievances that will not affect the reputation of Company.   | Stakeholder Officer       |
| Level 3  | Repeated, extensive and serious grievances that may jeopardize the reputation of Company.  | Grievance committee       |

**d. Acknowledge**

A grievance will be acknowledged, by the grievance owner, within five working days of a grievance being submitted. Communication will be made either verbally or in written form.

The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

**e. Investigate**

The Stakeholder Officer along with the employees is responsible for investigating the grievance. The investigation may require the team to make site visits, consult employees, contact external stakeholders and complete other activities. Records of meetings, discussions and activities all 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.

**f. Act**

Following the investigation, the Stakeholder Officer will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The Stakeholder officer is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to.

Once all actions have been completed and the team feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

**g. Follow up and close out**

The Stakeholder officer will make contact with the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder, the stakeholder officer will verify that the outcome was satisfied and also gather any feedback on the grievance process.

## 7. Appeal

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the Stakeholder Officer needs to escalate the matter to the Grievance Committee. The committee will review the grievance and all documentation gathered throughout the investigation and determines whether further actions are required to resolve the grievance.

Company is fully committed to resolving an external stakeholder's grievance so if Company is unable to resolve a complaint or a stakeholder is unhappy with the outcome, Company may seek advice from other independent parties.

## 8. Storing of Grievances

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed with confidentiality for all parties involved.

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## Annexure A – Grievance Lodgment Form

|   |  |
|---|--|
| <b>Name:</b>  |  |
| <b>Company (if applicable):</b>                                       |  |
| <b>Date:</b>  | <b>Time:</b>                             |
| <b>Preferred Contact Method:</b><br>Telephone / Email /Correspondence | Please provide contact details:<br>_____ |
| <b>Supporting Documents Attached?</b>                                 | Yes _____ No _____ (Tick Mark)           |
| <b>Please provide details of your grievance</b><br>_____<br>_____     |  |
| <b>What outcome are you seeking?</b><br>_____<br>_____                |  |
| <b>Additional Information</b><br>_____                                |  |

### For Office Use Only

|                              |                             |
|------------------------------|-----------------------------|
| <b>Stakeholder Reference</b> |                             |
| NGO                          | Government – State or Local |
| Neighbor communities         | Contractor                  |
| Political Party/Person       | Consultant                  |
| Other                        |                             |
| Comment:                     |                             |

Claimant Signature: ..... Date: .....

Company Signature: ..... Date:.....

**Annexure B – Grievance Register**

| <b>Stakeholder</b> | <b>Date received</b> | <b>Stakeholder Contact Officer</b> | <b>Grievance Level (1, 2, 3)</b> | <b>Grievance Description</b> | <b>Cause of the grievance</b> | <b>Outcome</b> | <b>If a resolution was offered, please indicate 'accepted' or 'not accepted'.</b> | <b>Remarks</b> |
|--------------------|----------------------|------------------------------------|----------------------------------|------------------------------|-------------------------------|----------------|---|----------------|
|                    |                      |                                    |                                  |                              |                               |                |   |                |
|                    |                      |                                    |                                  |                              |                               |                |   |                |
|                    |                      |                                    |                                  |                              |                               |                |   |                |