

GoApptiv Private Limited

External Grievance Redressal Policy

Policy Name	Version	Effective Date
External Grievance Redressal	1.0	01 April 2025

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Introduction:

GoApptiv Private Limited's (hereinafter referred as 'GoApptiv / Company') External Grievance Redressal Policy responds to grievances and concerns raised by individuals, communities and organisations negatively affected or potentially negatively affected by GoApptiv's activities.

We recognize that our business impacts not just employees but also the communities and stakeholders we engage with. The grievance process outlined in this document provides an avenue for stakeholders to voice their concerns and offers transparency on how external grievances will be managed and aims to reduce conflicts and strengthens the relationship between the Company and its stakeholders.

The Company is committed to strengthen relationships with its stakeholders by effectively addressing any grievances in a timely and effective manner.

Scope

The External Grievance Redressal Policy is applicable to external stakeholders viz. Investors, customers, locally affected communities, pharmaceutical industries, Government and Regulatory authorities.

Definitions

Grievance: A concern or an issue that the external stakeholder who are affected by the business operations and/or conduct of business, wants to address the Company.

External Stakeholder: Individuals or groups outside the Company who are not directly employed by the Company but are affected in some way by the decisions of the business such as Investors & Board members, Promoters and government & regulatory authorities (not applicable to contractors).

Responsibilities

The Ethics and Grievances Committee (EGC) shall bear the overall responsibility for addressing and resolving external grievances. The EGC shall be duly constituted and composed of employees of the Company. The ultimate accountability for grievance resolution shall rest with the EGC and the Management Board.

Grievance Reporting Channel

- The grievance or concern should be lodged through the GoApptiv's website, whereby online registration of grievances or concerns can be made through our website <https://www.goapptiv.com/#>.
- Any grievance or concern can also be emailed to grievances@goapptiv.com. This can be done using the form provided in Annexure 1.

Grievance Redressal Mechanism

Acknowledgement of Grievance:

- Every grievance will be acknowledged within 3 working days via email sent to the email provided in the Grievance Reporting Channel section.
- The acknowledgment will include the unique Grievance ID, estimated resolution timeline, and contact details for follow-ups.

Investigation and Resolution of Complaints:

- All grievances shall be classified into the following three categories:
 - Minor Complaints: These include grievances that are incomplete, lack sufficient evidence, or require additional clarification before further processing.
 - Major Complaints: This category includes cases of harassment, whether physical, verbal, sexual, or any other form of misconduct that affects the dignity and safety of an individual.
 - Critical Complaints: Complaints falling under this category pertain to financial fraud, conflicts of interest, bribery, kickbacks, any form of financial misconduct, or misappropriation of assets.
- The EGC will assess the complaint, gather necessary information, and propose corrective actions within 7-20 working days depending the category of the case.
 - Minor complaints: 20 working days
 - Major complaints: 10 working days
 - Critical complaints: 7 working days
- If required, discussions with the aggrieved may be conducted to clarify the issue. An emergency can also be convened depending on the severity and criticality of the grievance/issue reported.
- Post investigation, a formal resolution plan will be developed, and an update will be provided to the complainant within the next 15 working days. If additional time is required, an interim response will be communicated, explaining the reason for the delay and expected resolution timeline.
- The implementation of corrective actions will be monitored, and periodic updates will be shared with the complainant until closure.

Escalation and Review Process:

- If the complainant is dissatisfied with the resolution provided, they may escalate the grievance within 10 working days of receiving the response.
- The EGC will re-evaluate the complaint and provide a final resolution within 15 working days from the receipt of escalation.
- If unresolved, the matter will be escalated to the Management Board i.e. Managing Director, Whole-time director and the Compliance Officer for final review.

Appeal Process:

- If the complainant is not satisfied with the final resolution, they may formally appeal to the Management Board who will review the grievance independently and make a binding decision within 15 working days.
- The complainant shall have the right to file an appeal within 30 days from the date of receipt of the resolution. The appeal must be substantiated with a new set of evidence not previously considered. Upon review the case will be re-evaluated, and if warranted, appropriate corrective actions including policy amendments and additional trainings, if required, shall be implemented for final resolution and closure.
- The final decision will be communicated to the complainant along with reasons for the conclusion.

Confidentiality and Data protection

GoApptiv owes a duty of confidentiality to the aggrieved. No communication and procedural steps towards remediation will disclose any sensitive or personal information. The aggrieved's personal details will only be made available to GoApptiv's employees or committee involved in the grievance process.

Amendment

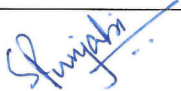


The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the directors, employees, and stakeholders unless the same is notified to the Directors and Employees in writing and displayed on the website in case of stakeholders.

Review

This policy is effective as of 01 April 2025. The policy will be reviewed and updated annually or as required to ensure compliance with applicable regulations and to reflect any changes in organizational practices or industry standards by the designated Ethics & Grievance Committee of the company. This will remain in effect until the latest version is released.

Violation

Any employee who believes a conflict arises between the language of the policy and the laws, customs, and practices of the place where he or she works, or who has questions about this policy, should raise those questions and concerns with Compliance Department of the Company. Employees can also report suspected policy violations.

	Drafted by	Reviewed by	Approved by
Signature			
Name	Shreya Punjabi	Srikanth Dahagam	Sreeram Venkitaraman
Designation	Compliance Manager	Chief Human Resource Officer (CHRO)	Chief Purpose Officer (CPO)

Annexure 1:

Grievance Reporting Form

External Grievance Reporting Form

Name:

Organisation:

Contact Number:

Email Address:

Preferred Mode of

Communication:

Date of Grievance Submission:

Grievance ID (For Office Use

Only):

Details of the Grievance (Please
provide a clear and detailed
description of the issue, including
dates, locations, individuals
involved, and any relevant
documents or evidence):

Have you previously reported this
grievance? (Yes/No)

If yes, provide details of previous
submission and response
received:

Annexure 2:

Grievance Tracking Template (for Internal Reporting)

Grievance ID	Date Reported	Grievant	Issue	Resolution / Action Required	Status	Date Resolved	Remarks if any
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To be submitted on quarterly basis to Board of Directors of the company.