

TRIVENI ENGINEERING AND INDUSTRIES LTD

GRIEVANCE REDRESSAL POLICY

Background/Preamble:

Triveni Engineering and Industries Limited (hereinafter referred to as 'the Company' and 'TEIL') is committed to developing a conducive workplace where grievances are quickly and fairly adjudicated. The Company's goal is to encourage a strong and positive ecosystem for all its stakeholders by hearing them out, responding to their problems and by resolving them within the stipulated period.

Purpose:

The Company is committed to developing an ethical workplace, maintaining healthy industrial relations, communications, and dialogue, and ensuring that all stakeholders are treated fairly and equally, in principle and practice.

The objective of Grievance Redressal Policy is to provide a reachable mechanism for settlement of Grievances and to adopt such measures in the Company as would ensure swift redressal of Grievances of the stakeholders leading to increased satisfaction at the workplace which has a direct bearing on overall efficiency of the Company.

This policy provides a platform for stakeholders to address their grievances, concerns, or complaints in a systematic and trustful manner. The policy aims to:

- Treat all stakeholders fairly, equally, and without any biases.
- To institute a system to ensure that all complaints are treated promptly and dealt within the allotted time frames.
- Create an effective Grievance Redressal system that will enable fair and equitable resolution of complaints or concerns.

Coverage:

The policy is applicable to all the TEIL stakeholder, except employees and trainees, across all Indian operation.

Exclusion:

Any complaints received from the customers in the ordinary course of business relating to goods supplied, service rendered or project execution will not be covered under this policy as the same needs to be decided/attended to by the concerned business vertical in accordance with the contractual obligations under the contract with the customer.

Definition:

"Policy" means "Grievance Redressal Policy"

"Stakeholders" means Customers, Business partners, Vendors, Regulatory bodies, Shareholders and Investors, Lenders and Rating agencies, Communities, Government Agencies & Local Authorities, Service Providers and Suppliers, Media, and Public at large.

“Grievance” - A grievance is an act of omission or occurrence which a stakeholder feels as injustice that can be established based on facts and figures.

“Grievance Handling Officer (GHO)” – In relation to the shareholders/investors, the Compliance officer of the Company will be responsible for handling Grievances (as detailed in Part B) whereas in respect of other stakeholders, GHO will normally be the Corporate HR Head. The Vice Chairman and Managing Director (VCMD) may nominate any other employee as the GHO, based on the requirements and specific expertise required for a specified period /financial year.

“Complaint” - any communication that expresses dissatisfaction, in respect of the conduct or any act of omission or commission or deficiency of service and in seeking a remedial action but does not include the following -

- Complaints that are incomplete or not specific in nature.
- Communications in offering suggestions.
- Communications seeking guidance or explanation.

Guidelines relating to Grievance Redressal :

- The Policy aims at resolving stakeholder’s (covered under the Policy) Grievances as fairly and as quickly possible.
- Stakeholders may lodge Grievances without fear of oppression.
- All Grievances will be in writing and no verbal Grievance shall be entertained.
- Any intentional Grievance raised to malign the reputation of an individual or false allegation shall be considered as misconduct and shall not be taken into consideration for redressal. The Company reserves the right to take an appropriate action against such grievances
- If the Grievance arises out of an order given by Management, the said order shall be complied with before the concerned stakeholder raises the order as Grievance.
- Grievance shall be treated with utmost confidentiality and sensitivity.
- Grievances from the stakeholders (other than shareholders and investors) will be handled in accordance with Part A whereas Grievances from shareholders and investors will be handled in accordance with Part B.

PART A

Stakeholders Grievance and Redressal Policy (Other than Investors)

Grievance Redressal Process

The following process should be followed for expressing and seeking redressal of Grievances:

- The GHO is assigned to receive and acknowledge the Complaints from stakeholders other than investors.
- Stakeholders can raise their grievances through the dedicated channel by stating all relevant facts, dates and the names of any individual concerned. If not comfortable, the stakeholders can choose to not disclose their identity unless considered necessary by the Company to properly investigate the grievances.

Channels through which the stakeholders can register their complaints

Email Id (in respect of Grievances from stakeholders other than shareholders/Investors:xxx)

- The GHO may determine if it is necessary to make further inquiries and/or investigate the background facts or the allegations made by the stakeholder within 10 working days of receipt of the Complaint.
- The GHO may reject the Grievance outright if additional inquiry reveals it to be frivolous. Accordingly, the stakeholder will be informed
- GHO may delegate investigation of the Grievance to the concerned unit head or a team of concerned HODs. Accordingly, after investigation a report would be submitted to the GHO along with recommendation for further administrative action.
- The Grievances will be resolved within 60 working days of registration and the complainant will be notified of the status of their complaint resolution.
- The GHO shall preserve records pertaining to grievance/complaint received, resolution and closure of the grievance.
- If the complainant is not satisfied with the approach in which his or her issues have been resolved or if the GHO has not addressed the issues appropriately, the Grievance may be escalated to the VCMD by the complainant.

The complainant can contact VCMD through:

Emails: xxx (a new email ID may need to be created for this purpose)
--

Communication of the Policy:

The stakeholders will be made aware of the Policy through various communication channels, meetings or personal interactions. Further, TEIL shall put the Policy on its website for easy accessibility.

Review and monitoring:

The Grievance Handling Officer is responsible to oversee the implementation and compliance of the policy and report any shortcomings or discrepancies to the concerned authority as per the organizational hierarchy.

Vice Chairman & Managing Director is authorized to interpret / clarify, supplement and issue operational guidelines related to this Policy. With the introduction of this policy, all previous policies on Grievance Redressal stand superseded.

PART B

Policy Title	Investors' Grievance and Redressal Policy
Responsibility	Company Secretary & Compliance Officer
Applicability	This Policy is applicable to Investors/Shareholders of Triveni Engineering & Industries Limited
Purpose	<p>The Company is listed on BSE Limited and National Stock Exchange of India Ltd. and is governed by the provisions of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') and the Companies Act, 2013 ('Act'). As per Listing Regulations as amended, including the circulars, notifications issued thereunder from time to time, the Company is required to ensure adequate and timely redressal of all investors/shareholders grievances pertaining to securities of the Company. Accordingly, adequate mechanism is put in place for expeditious redressal of investor complaints.</p> <p>In the event of any conflict between the provisions of this Policy and other applicable laws, the provisions of applicable law shall prevail.</p>
Rights of Shareholders	<p>Subject to and in accordance with applicable laws,</p> <ul style="list-style-type: none"> • access to relevant, sufficient and timely information concerning the investors/shareholders including general meetings, annual reports etc., to enable them to participate in the corporate governance process. • to participate effectively and vote in general shareholder meetings • to obtain effective redressal for violation of their rights as an investor/shareholders
Obligations of the Company	<ul style="list-style-type: none"> • The Company shall ensure that it is registered on the SCORES platform or such other electronic platform or system of the SEBI as shall be mandated from time to time, in order to handle investor complaints electronically in the manner specified by SEBI from time to time. • The Company shall file with the recognized stock exchange(s) on a quarterly basis, within twenty one days from the end of each quarter, a statement giving the number of investor complaints pending at the beginning of the quarter, those received during the quarter, disposed of during the quarter and those remaining unresolved at the end of the quarter. The said statement shall

	<p>also be placed before the Board of Directors of the Company on quarterly basis for their review.</p> <ul style="list-style-type: none"> • The Company shall respect the rights of shareholders that are established by law or through mutual agreements, to the extent applicable. • The Board of Directors of the Company shall maintain high ethical standards and shall take into account the interests of shareholders. • The Company shall maintain a functional website wherein the contents of said website should be updated from time to time and the website shall contain all the relevant information about the Company, including the following: <ul style="list-style-type: none"> ○ Details of its business; ○ Financial information including annual reports ○ Contact information of the designated officials of the Company who are responsible for assisting and handling investor grievances; ○ Information, notices, circulars etc. concerning shareholders; ○ All intimations and announcements made by the Company to stock exchanges; and ○ Any other information which may be relevant for the investors/shareholders.
<p>Grievance Management</p>	<ul style="list-style-type: none"> • In order to comply with the relevant provisions of the Act and Listing Regulations, the Company has constituted a Committee of Directors namely, Stakeholders Relationship Committee ('SRC'), • The terms of reference of the SRC include, inter-alia, to consider and resolve grievances of the investors/shareholders, including complaints related to transfer, transmission of shares, demat and remat of equity shares, non-receipt of annual reports, declared dividends, transfer of shares/ dividend to Investor Education protection fund, and to review the measures/initiatives taken by the Company to improve the investors' complaints redressal mechanism etc. • The Company is currently registered on the SCORES platform of the SEBI and shall deal with investor complaints in the manner specified by the SEBI. • The Company has a separate designated email for redressal of investor complaints i.e. shares@trivenigroup.com

	<p>The Company seeks to redress complaints as expeditiously as possible and endeavor to redress the complaint not later than 10 working days from the date of receipt.</p> <ul style="list-style-type: none"> • The Company has a functional website i.e. www.trivenigroup.com whereat all financial and other relevant information are available. • The Compliance officer of the Company is responsible to oversee the redressal of shareholders/investors complaints.
Role of SRC	<p>The SRC shall periodically review the status of investors' complaints and their redressal undertaken by the Company, but at least once in a year.</p> <p>The SRC is authorized to interpret/clarify, amend, supplement and issue operational guidelines related to this Policy, as and when deem appropriate.</p>

Version History:

Version	Approved By	Approval Date	Effective Date	Clause(s) Modified

**Indicative table*