

GRIEVANCE REDRESSAL POLICY

Grievance means any kind of discontent or dissatisfaction, whether valid or not arising out of anything connected to the business interests of Capital Trust Limited (hereafter “CTL”) that all stakeholders (employee, customers & community) think, believe or even feel, is unfair, unjust or inequitable.

There are various types of grievances and these can be classified as follows:

- Employees’ concerns relating to the work environment, interpersonal relationships, discipline and/or conduct of subordinate /supervisor
- Concerns related to terms of services, benefits and their interpretation
- Customers’ concerns related to the Pre & Post lending processes
- Community concerns towards E&S issues arising from any of the investment made by CTL

CTL encourages all stakeholders to express their grievances and suggestions through proper channels. CTL will ensure finding appropriate ways to handle suggestions, grievances & complaints and address them in an effective and time bound manner so as to ensure harmonious relationships with all stakeholders as well as the effective functioning of the organisation.

The Grievance redressal framework is defined by CTL described as follows:

- Grievances will be registered and logged regardless of whether they were received through any mode of communication e.g. in writing (letter, emails etc) or verbal (Phone helpline etc).
- The complainant should receive an acknowledgement of the receipt of the complaint within a prescribed and reasonable timeframe, preferably in writing.
- Complaints will be reviewed as soon as they are received and prioritized for resolution.
- CTL will make sure that grievances are not dismissed on grounds of an administrative formality and/or procedure.
- A database will be maintained to manage and monitor grievances. CTL will maintain a log of all grievances, even recurrent ones or grievances that will eventually be dismissed as unreasonable.
- Periodic grievance monitoring reports will be maintained. These reports will include the following indicators to ensure the effectiveness of the grievance handling system:
 - Number of grievances during the reporting period: Opened, resolved and closed

- Categorization of grievances e.g. noise/compensation/bad smell/ safety etc.
- trend in time e.g. number or category of complaints compared with previous reporting periods
- The following indicative timeframe shall be used as a guideline both for workers' and communities' grievances: ☐
 - If that grievance can be solved at the HRD level then that will be solved within 72 hours of receiving the complaints. If then also it is not solved then an appropriate panel of senior team is formed to address the issue.
 - Proposed resolution: within 30 days of receiving the grievance.
- CTL will ensure that all arrangements are in place for maintaining confidentiality, reviewing and resolving grievances, ☐
- Regarding community grievances, CTL will designate a point of contact within the admin department to which grievances should be addressed. Once the grievance has been received and acknowledged, CTL will allocate trained staff for its resolution depending on the scope of the grievance.
- CTL will ensure that stakeholders/ potential complainants are well informed about the grievance redressal mechanism and they can submit their grievances through all possible communication mediums e.g. Leaflets, website links, posters in offices or complaint boxes at strategic locations to raise their grievances.
- CTL will communicate the complainant in writing/verbally/through mail about the status of grievance at each timeline.