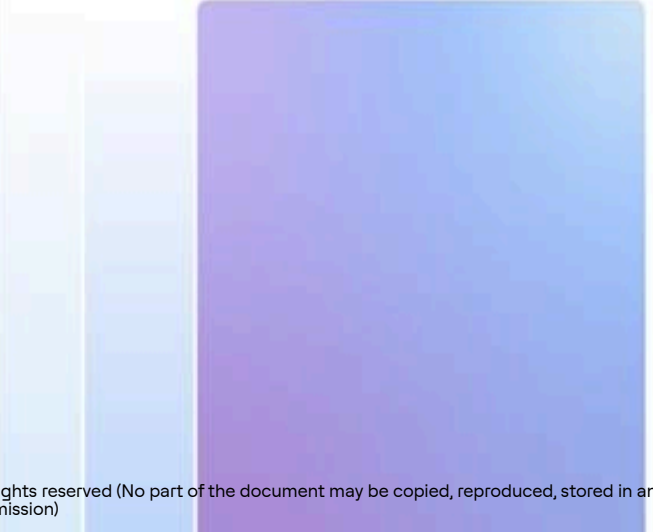
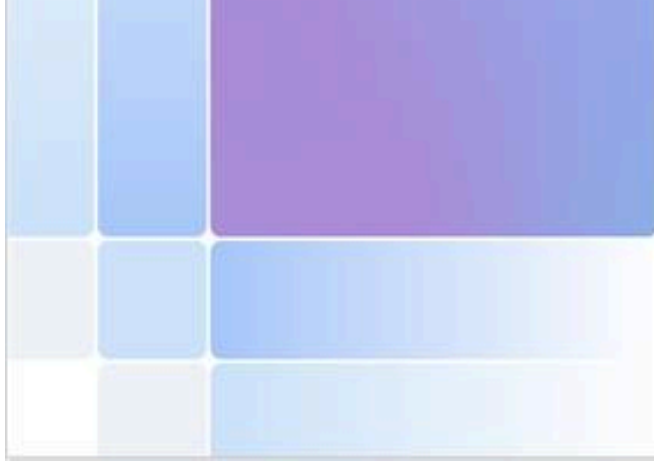


Grievance Redressal Protocol

Latest Updated Date: 9 Jul, 2025





Scope

The Grievance Redressal Protocol is applicable to all employees on the payroll of HCLTech and its subsidiaries in India.

Scope

This policy applies to all employees including all permanent employees, fixed term and temporary contract employees in HCL Insurance BPO Services Limited.

Scope

This policy is applicable for all employees active on the payroll of HCLTech (Ireland) Information Systems Limited and HCL TECHNOLOGIES Limited, Ireland Branch, Dublin.

Scope

The policy is applicable to all Employees on rolls of HCL DPO, Northern Ireland.

Scope

This policy is applicable to all HCLTech employees based in HCLTech Branch - United Kingdom.

Policy Statement

At HCLTech, our operations are guided by fostering trust and transparency in all relationships with directors, employees, customers, partners, stakeholders, and suppliers. This belief shapes our daily practices. Through our Grievance Redressal Protocol, we empower every whisper to catalyse change, ensuring every concern is heard and addressed.

This protocol delineates operational procedures, responsibilities, and protocols for handling:

- Violations of the POSH Act 2013 and Secure Policy of the company
- Violations of the COBEC and ABAC Policy
- Non-compliant acts under the Whistleblower Policy
- Legal Matter handling:

Complaints registered under the POSH Act 2013 & SECURE Initiative

Ensuring a safe and respectful workplace environment, free from all forms of discrimination and harassment, including sexual harassment, is a core commitment.

The “**SECURE**” initiative focuses on preventing and addressing grievances of sexual harassment in the workplace in line with our Prevention and Redressal of Sexual Harassment at Workplace policy. The policy and processes comply with the prevailing laws, specifically the “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” for India-based employees and other relevant regulations of the countries we operate.

If any employee experiences Sexual harassment, they can report the incidents by submitting their grievance to the Global Ethics Helpline.

Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

Employees from **Germanv/Netherlands** shall continue using **the Smart Service Desk for SECURE** complaints/write to secure@hcltech.com.

“The Internal Complaints Committee (ICC) investigates and handles complaints raised via this channel with utmost fairness and confidentiality, ensuring that standard SLAs as per law are met. The SLAs for completing the inquiry and taking action are clearly defined in the Prevention and Redressal of Sexual Harassment at Workplace Policy.”

HR Representative:

- HR representatives must familiarize themselves with and adhere to the “Prevention and Redressal of Sexual Harassment at Workplace Policy”.
- It's important for HR representatives not to conduct investigations themselves; instead, they should promptly **forward any such matters to Secure@hcltech.com** for further review. For **any queries or clarifications**, please feel free to **contact Secure@hcltech.com**.”

Acts which violate COBEC and ABAC policy of the company

Acts that contravene the company's **COBEC and ABAC** policies are addressed through the HEAR channel. HEAR is a direct line to the Ombudsman's desk, redirecting employee grievances to the relevant individuals for investigation. If these grievances are not adequately addressed through SSD responses or engagement with the leadership team, HR, and/or Internal Audit team, employees can report them via the **Global Ethics Helpline**.

Path: MyHCLTech >>Top Ribbon (Main Menu)>> Ethics Helpline

Employees from **Germany/Netherlands** shall continue using the **Smart Service Desk** for **SECURE** complaints/write to secure@hcltech.com.

The Hear Cell: Empowering Employee Voice and Resolution

- Provides employees with a platform to express their concerns
- Serves as a centralized hub for receiving all employee grievances, including those related to HR matters from whistleblowers
- The HEAR program team directs grievances to the relevant HR department, ensuring timely responses with appropriate attention and care
- Offers support in identifying solutions for managing or resolving concerns
- Facilitates communication between conflicting parties
- Offers conflict resolution skills training
- Provides upward feedback to management regarding conflict trends, pressing issues, and other significant organizational matters

Note:

In case any candidate is charged any recruitment fees during the recruitment process, they can raise a concern by submitting their grievance as stated above.

Direct grievances to the HEAR team will be referred back to HR for investigation and to address appropriately.

Legal Matters Handling

- Please forward any grievances/issues related to below at hear@hcltech.com:
- Government related authorities
- Court related representations
- Labor Office-related matters
- Matters related to Police and other agencies
- Any other forum

The "Hear" team collaborates with the Company's legal department to address these issues. HR teams can be approached for necessary support.

Acts under Whistle Blower policy of the company:

Whistleblower Policy: Promoting Transparency and Accountability

At HCLTech, we prioritize Trust through Transparency and Accountability. This Policy has been established to ensure the company's adherence to ethical and legal standards.

Email: whistleblower@hcltech.com

- Provide a platform for reporting unethical behavior, fraud, or violations of the company's code of conduct
- Encourage timely and open reporting of alleged wrongdoings
- Ensure consistent and timely responses to reports
- Ensure proper reporting of whistleblower investigations
- Promote ethical and lawful conduct
- Safeguard against victimization

1. Reporting Procedure

Reports of suspected unethical activities should be made in writing to ensure clarity. Reports should contain specific factual information to facilitate proper assessment of the nature, extent and urgency of preliminary investigative procedures. The whistleblower does not need to prove the concern but must provide sufficient grounds for raising it. Reports can be made anonymously, but further action will be at the discretion of the Whistleblower Committee based on the disclosure provided.

2. Investigation Procedure

All complaints received by the Ombudsman are categorized into two main groups:

- Complaints against CEO / CFO / CPO / President / Corporate Officers (referred to as "C" Level officers)
- Complaints against others:-

Complaints against "C" level officers are handled by the Company's Chairman's Office and can be directed to chairman@hcltech.com

The Ombudsperson Function conducts preliminary investigations for complaints against employees other than "C" level officers. Based on the preliminary investigation report, the Ethics Committee decides on further investigation and next steps.

The Audit Committee team handles whistleblower complaints, while the Employee Relations team acts as a facilitator in the process.

The list of malpractices can be referred from the Annexure section.

Team Structure (Subject to change):

- Employee Relations Lead: Ranganathan V (Associate Director, Employee Relations)
- India and Onsite: Annie S (Consultant, Employee Relations)

Policy Statement

Objective

HCLTechIBS (the Company) is committed to appropriately addressing grievances raised by employees regarding all employment matters and aims to find ways of resolving grievances to the satisfaction of all parties involved. The Company encourages the use of informal resolution, where appropriate, before referral to the formal grievance procedure, in an attempt to create a harmonious working environment.

The procedures outlined within this document will refer to all manner of grievances, whether the employee's complaint is about their working environment or about another individual.

Despite precautionary measures, it is possible that employees may experience difficulties with their jobs, their working conditions or colleagues.

If an employee experiences such difficulties and wishes to raise them, they should first discuss matters with their Manager to find a way in which the problems can be resolved informally. The Manager will retain notes of these informal discussions. However, if the problem concerns the employee's Manager or cannot be resolved informally then the employee can utilise the standard procedure set out below.

Throughout the procedure the principle applies that both the Company and its employees should act consistently, should raise and deal with issues promptly and should not unreasonably delay meetings, decisions, or confirmation of those decisions.

This policy and procedure is non-contractual and may be amended or withdrawn at HCLTechIBS' discretion.

Purpose

The purpose of this policy is:

- To encourage free communication between employees and the Company
- To ensure that questions and problems arising during the course of employment can be aired and, where possible, resolved quickly and to the satisfaction of all concerned.

Policy Details

Responsibilities

Directors and Senior Management

To ensure that managers adhere to the terms of the Company grievance procedures, apply them in a consistent manner and ensure that managers receive support to implement the procedures including relevant training.

Line Managers

All Company managers are responsible for following the Company's Grievance Procedures, communicating the procedures to their line reports and team and acting in a professional manner when dealing with grievances and addressing the relevant issues.

Employees

All employees are responsible for raising any grievances that they may have in line with the terms of the procedures and for ensuring that they act in a professional manner when raising grievances.

Procedure:

Identifying a Grievance

- Prior to the meeting please make sure that the Company has all the information it needs to carry out any investigation relating to the grievance and to have a reasonable opportunity to consider the information in advance of the meeting.
- A preliminary investigation may be undertaken where it is deemed appropriate by HR management. An investigatory officer will be appointed.
- Sometimes further investigation will be necessary after the meeting.
- If the matter was raised informally, HR will obtain the Manager's record of the grievance, will record any additional information and will reconsider the matter following the meeting.

If the employee is concerned as to the appropriate way in which to raise a concern that they may have about any aspect of their employment with HCLTechIBS then they can discuss this with HR.

Grievance Procedure

Where a grievance cannot be resolved informally, the following stages will apply:

Grievance meeting– An employee should raise the issue with his/her immediate line manager (or his/her nominee) in writing. The letter must set out the nature of the grievance. All grievances should normally be lodged within five working days of the issue complained of arising.

If it is necessary, a meeting will be scheduled with the employee to discuss the grievance without unreasonable delay. The employee and their companion should make every effort to attend the meeting.

If the employee remains dissatisfied, they have the right to appeal to the next stage within five working days of receiving the decision.

Appeal – The employee may appeal against the decision by referring the matter in writing within 5 working days of receiving confirmation of the outcome of the grievance. The Company will arrange for the grievance appeal to be heard by a relevant manager within 10 working days. All appeals must set out in writing the grounds on which the employee is making the appeal.

The employee will be invited to the appeal meeting and informed of their right to be accompanied. The employee and their companion should make every effort to attend this meeting. The employee should notify those dealing with the matter of any difficulties in respect of attendance as soon as possible.

The manager hearing the appeal will hear representations from the employee and their chosen companion (if any) before giving a decision. The decision will be final and will be confirmed to the employee in writing without unreasonable delay. In relation to any grievance, the decision taken at the appeal stage of this Procedure will be final and no further appeal may be made.

Every effort will be made to resolve the issue as quickly as possible at each stage, and within the agreed time-scales.

HCLTechIBS will look unfavorably upon any employee who manufactures a grievance for their own personal gain and disciplinary action may be taken in any such situations.

Emphasis is placed on putting forward concerns in a clear and objective manner understanding that these will be shared with other people involved and that the employee's purpose in pursuing the grievance procedure should be to highlight their concerns not with the aim of disciplinary action being taken against any other employee.

The grievance procedure should be followed if the employee has a grievance arising from their employment, except where the matter relates to disciplinary action or constitutes an appeal against a disciplinary decision. In these cases, the grievance should be raised in the context of the Company's separate Disciplinary Policy. If a grievance is raised by an employee during a disciplinary meeting, the grievance can, in most circumstances, be dealt with at any subsequent disciplinary appeal hearing. In these circumstances there is no need for the Company or the employee to follow this Grievance Policy.

Exceptions to the Grievance Procedure

Exceptions to the key stages in the grievance procedure may include:

- Where an employee believes it is not appropriate to talk to their immediate Line Manager, they should contact their Human Resources Department.
- Any collective grievance raised by a group of employees brought to the attention of an Employee Forum representative. This procedure shall not apply in these circumstances.
- Where there may be a conflict of opinion, either on the grievance matter, or relations more generally, between the employee and the Manager hearing the grievance, in such instances, an alternative Manager may be appointed to hear the grievance.
- Depending on the seniority of the employee raising the grievance, there may be a need to vary the appeal lines and band levels from those identified in the key stages of this procedure.
- If the employee has already left the Company's employment, a different procedure may apply.

Grievance Meeting

If a formal grievance meeting needs to be convened:

Before the meeting the employee:

Will be given notice to attend a grievance meeting and advised of their right to be accompanied by a work colleague, full time or lay trade union officer will be provided with copies of any relevant documentation.

During the meeting:

The employee will have an opportunity to discuss their grievance in detail and how they propose this should be resolved.

After the meeting:

A decision will be provided in writing, if possible, within 5 working days and the employee will be informed of their right to appeal the line manager's decision will be confirmed in writing.

Right to be accompanied

An employee has the right to be accompanied at any grievance meeting (which includes any appeal hearing) by a companion of their choice (unless the request is unreasonable) who is either:

1. a work colleague; or
2. a full time official employed by a trade union; or
3. a lay official, provided they have been certified in writing by their union as having experience of, or as having received training in, acting as a worker's companion at grievance hearings.

Solicitors and other external legal advisors are not permitted as employee companions.

In making their choice, employees should bear in mind that it may not be appropriate to insist on being accompanied by a colleague whose presence might prejudice the hearing or who might have a conflict of interest.

There is no duty on a fellow worker to accept a request to accompany an employee and no pressure should be brought to bear on a person if they do not wish to act as a companion.

It is the employee's decision as to whether or not they choose to have a companion accompany them.

The employee will need to inform the Company in advance who their chosen companion is.

The role of an employee's companion at a grievance meeting

An employee's companion may:

- address the hearing
- make submissions on behalf of the employee
- ask questions of the line manager hearing the grievance or any witnesses called to the meeting

- call for the production of any relevant documentation
- confer with the employee
- summarise the employee's case or make any final submissions at the end of the hearing before a decision is made

An employee's representative is not allowed to:

- answer questions put to the employee
- talk to the line manager hearing the grievance in confidence
- disrupt the hearing.

It is the responsibility of the employee raising the grievance to provide his/her companion with copies of any documents used during the grievance procedure, including copies of any letters issued to the employee prior to or as a result of a grievance meeting. In certain circumstances, HCL IBS reserves the right to withhold information, for example to protect a witness.

Policy Statement

Objective:

The purpose of the grievance policy is to enable fair and efficient resolution of any grievance or issue an employee may have relating to his or her employment. The policy provides a mechanism to ensure that grievances can be raised in a structured manner and thereby addressed and resolved without undue delay.

Policy Details:

General Principles

The Company recognises that grievances may occur in any organisation or workplace, hence the importance of robust processes to facilitate resolutions. This policy is applied fairly and consistently to all employees.

Provided that the grievance is not maliciously motivated, an employee who raises a grievance in good faith will not suffer adverse treatment, even if the grievance is not substantiated.

Every effort will be made to resolve the grievance at the earliest stage possible.

Management will ensure that a full investigation of the facts is carried out. This may involve meetings with third parties as appropriate.

Employees are entitled to be accompanied by a fellow employee during the grievance process for support. External representatives are not permitted (e.g. spouse, partner, legal representative) with the exception of trade union representatives. The employee must inform the Company of the identity of his or her chosen representative in advance. The Company accepts any reasonable representative as proposed by the employee. The representative is for support purposes only (ie they may discuss matters with the employee, requesting an adjournment if appropriate, however this does not extend to speaking on behalf of the employee).

Where an employee's chosen representative is not available to attend on the date or at the time at which a grievance meeting is scheduled, the Company will allow one re-scheduling of that meeting. The non-availability of the representative will not be grounds for a further postponement of the meeting. In such circumstances, the employee will be required to nominate an alternative support representative.

A written record of each meeting will be maintained.

The date/time of grievance meetings will be proposed by management. The employee is responsible for informing management immediately if the proposed date/time is not suitable for him/her. At all stages, proceedings will be completed as quickly as is possible having regard to the need to ensure that justice is done. Copies of correspondence and written records relating to the grievance will be kept in the employee's personnel file.

All stages of the grievance process will be treated confidentially, subject to the Company's legal requirements and such internal communications as are necessitated by the proper conduct of the process in question. Discussions with individuals other than the employee, his or her representative and management will take place only if required for the investigation or resolution of the grievance. The burden of confidentiality lies on all participants in the process, including management, the employee, his or her representative and all other persons involved.

During all stages of the grievance policy, normal working conditions and deliverables must continue, under protest if necessary.

This policy has been drafted having regard to the Code of Practice on Grievance and Disciplinary Procedures S.I. 146 2000 and to best practice in general.

Process:

A: Informal Action

Employees must make every effort to resolve all grievances or issues informally through the normal course of work directly with the person/people concerned and/or his or her direct manager as appropriate. Grievances or issues should be raised by the employee as they arise. This is regarded as the most effective and efficient way to resolve matters.

B: Formal Action

The formal stage of the grievance process will be invoked if the above mentioned informal actions are inappropriate, ineffective or deemed unsuitable. HR will support the fair application of the grievance process and will facilitate the resolution of disputes where reasonably possible.

Stage 1 – Grievance meeting

The complainant must raise the grievance or issue with his or her direct manager or with HR. If the grievance in question concerns his or her direct manager, it may be raised with the next level of management (up to and including the Board of Directors).

All grievances must be submitted in writing, clearly setting out the substance of the grievance and making it clear that the formal grievance process is being invoked. Grievances must be submitted within four (4) working weeks of the most recent occurrence of the incident/conduct which is the subject of the grievance.

The manager or Director [supported by HR] will investigate the grievance, commencing this process as soon as is feasible, normally within ten (10) days of receipt of the written grievance. Meetings are arranged as necessary with the employee and any relevant third parties to discuss and investigate the grievance.

An employee's failure to attend a grievance meeting without giving both reasonable notice and a reasonable explanation may be considered to be a disciplinary issue. Furthermore, the outcome of the grievance investigation will be determined without that employee's input.

Deliberations following grievance meetings are concluded as quickly as possible, whereby the individual timeline reflects the gravity and complexity of the issue in order to ensure fair consideration of all details. Timelines for a decision will normally be agreed during the initial grievance hearing.

A written record of grievance investigations and meetings is maintained. The employee may be asked to sign such records. The grievance decision will be confirmed in writing.

Every effort must be made by both parties to resolve the grievance at stage 1.

Stage 2 – Appeal

The employee who raised the grievance may appeal the grievance decision in writing within five (5) working days. The written appeal must be lodged with [HR] and must clearly state the basis on which the appeal is being made.

The identity of the person who will hear the appeal is confirmed to the employee as soon as that person is identified. This person will differ from case to case. Every effort will be made to ensure the appeal is heard by someone not previously involved in the grievance process. A representative [from HR] is present at appeal hearings.

The appeal is heard as soon as is feasible, normally within 10 working days of receiving notification of the appeal. If this timeframe is unreasonable due to the nature of the appeal, availability of relevant individuals or the volume of material for review, a revised timeframe is communicated to the employee.

The person hearing the appeal may nominate an appropriate internal or external individual to conduct an investigation, clarify any matters arising from the original grievance decision or provide additional support (see below). The appeal is subject to standard obligations regarding written records, timelines etc. as above.

The appeal decision is communicated in writing, is final and binding on all parties.

Employees have the right to utilise the normal dispute resolution machinery of the State, including the reference of disputes to conciliation, the Rights Commissioner service and the Courts, as appropriate.

Additional support – External advisors

A member of the management team or the Board of Directors may hear the grievance and/or the appeal. At any stage of the process, he or she may decide, at his or her discretion depending on the circumstances of the issue, to draw on specialist advisor(s), normally an external arbitrator, who may be present at and participate in any meetings.

Spurious Grievances

Any grievance raised which is determined by the Company to have been maliciously or spuriously motivated will be grounds for disciplinary action, up to and including dismissal.

Policy Statement

GENERAL PRINCIPLE

The purpose of this policy is to set out the Company's procedure and rules for the handling of grievance related matters.

The arrangements for raising and dealing with problems which affect the Employees at work are as described below.

It is a normal line management responsibility to listen and respond to any work related problems raised by individual team members. Many can be solved without the use of any formal grievance procedure, and the immediate first approach will normally be that the Employee to talks to his/her Line Manager about the problem.

The Company will endeavor to ensure that

- All steps under the procedure will be followed without unreasonable delay

- The timing and location of all meetings are reasonable. Throughout the grievance procedure it is ensured that the grievances are dealt with in a timely and sensitive manner, also there needs to be flexibility to enable the grievance to be thoroughly investigated. Timescales can be reasonably extended depending on the merits of individual cases. If timescales need to be extended, individuals will be kept informed.
- Meetings are conducted in a manner which enables employees to explain his/her case
- As far as is reasonably practicable, a manager more senior than the manager who took the decision, which is being appealed, will conduct appeal meetings. This does not apply where the most senior manager attended the meeting at which the decision being appealed was taken.
- Employees have the right to be accompanied to any meetings by a fellow worker or accredited trade union representative. If Employees' companion cannot attend the scheduled meeting, Employee must propose another date and time that is no more than 5 days after the original meeting.
- Records shall be kept detailing the nature of the grievance raised, HCLTech's response, any action taken, the reasons for it and other information relevant to the process. These records shall be kept confidential.
- Any employee who has a grievance must exhaust each stage of the procedure before proceeding to the next stage. The matter shall not be progressed unless and until the appropriate procedural stages are complied with.

Policy Details

Informal Procedure

In the event of an Employee having any grievance relating to their employment, the Employee should first report the grievance to his/her line manager with a view to resolve the grievance by an informal discussion.

The Company does recognize that it may not be possible or appropriate to resolve every grievance informally. Where this is the case, Employee should use the formal grievance procedure set out below.

If the matter concerns Employees line manager, he/she can raise it with HR who will try to help resolve the matter.

Formal Grievance Procedure

If a grievance cannot be settled informally or if Employee prefers a formal approach, he/she should raise it formally with HR. This should be in writing without unreasonable delay addressed to the HR Manager.

If Employee has concerns about harassment or bullying, please see the Dignity at Work Policy which gives you guidance on what to do.

Policy Statement

Policy Details

To resolve any grievance relating to the employment, the procedure outlined below should be followed. This procedure is designed to resolve problems as soon as possible.

General Principles

Informal Grievance Discussion

- In the event of an employee having any grievance relating to their employment, the employee should first report the grievance to their line manager with a view to resolve the grievance by an informal discussion.

Formal Grievance Procedure

- If the employee is dissatisfied with the decision, or the grievance is not resolved within a reasonable time by informal discussion, the employee should refer the matter to their line manager formally in writing, and provide details of the grievance.
- An appropriate manager (Panel of investigation manager /s appointed by Head HR) will invite the employee to a meeting to discuss the grievance. A meeting will be held, if possible, within five working days of receipt of the written grievance. At the meeting, the employee will have an opportunity to explain the complaint in full.
- The employee can make a request for being accompanied by a representative/companion of its choice, which can either be a fellow employee or an employee forum representative or a trade union representative or an official employed by the trade union. It is the discretion of the Company to accept this request keeping in view the reasonableness of the request.
- An appropriate manager shall investigate the grievance and its background. The manager shall take any steps necessary to resolve the matters raised and shall give a written decision to the Head - HR, if possible within ten working days of the meeting referred to above.
- On receiving the written decision the Head - HR will notify the employee that they have a right of appeal against this decision if the employee is not satisfied with it.

Appeal

- Any appeal against the outcome of the grievance procedure must be submitted in writing within five working days of the notification of the company's decision. The appeal must be addressed to the Head - HR department and copy to the manager who investigated and must state the grounds upon

which the employee objects to the decision.

- An appropriate manager, who will not have been previously involved in the employee's case, will invite the employee to an appeal meeting. The appeal meeting will also be attended by an HR representative if possible.
- The manager shall consider additional information from the employee and shall take steps to resolve the matters raised
- The appeal decision will be communicated to the employee after the appeal hearing in writing and the decision of the manager shall be final and binding.

Modified Procedure

- A modified grievance procedure may apply where the employee's contract has terminated. This modified procedure will apply if the company was unaware of the employee's grievance before the employment ceased or the standard grievance procedure above was not commenced or completed prior to the end of the employee's employment.
- Where the modified grievance procedure applies, the employee must set out in writing their grievance and the details of it and send this to the HR department. The company will then set out its response in writing to the employee.
- There will be no meeting between the company and employee under the modified procedure. The decision of the senior manager/director who considers the grievance shall be final and binding.
- There will be no right of appeal.

Process

Smart Service Desk (SSD) Mechanism

- SSDs serve as a centralized system for tracking all employee grievances within HCLTech and monitoring the actions taken on them
- Employees can raise grievances via the MyHCLTech web or mobile application and track updates on raised SSDs
- The SSD system is open to all employees
- It includes an "On Behalf" functionality, allowing HR to raise requests with concerned processes/stakeholders on behalf of employees, enabling tracking of HR-handled grievances
- The system facilitates close monitoring of the HEAR and SECURE cases
- It centralizes all case-related evidence for improved tracking and audit purposes
- Reports can be generated based on various parameters such as Line of Business, Geography, Job Band, Category, Gender, and Account levels

Efforts are underway to ensure that future reports include details of actions taken, including the significance of each case

SSD Mechanism is:

- Open to all employees.
- Categories available for selecting grievance types.
- Online tracking of investigation status.
- Closure details updated by the PMO
- Report generation and analysis

SSD Link: <https://unifiedplatform.myhcltech.com/USP/Myrequest>

Please refer to the "Annexure" section of the Policy to refer to the SSD Raising mechanism.

3. Grievance Resolution

- Assess the complaint
- Determine investigation nature
- Gather evidence
- Apply appropriate standards of proof
- Create investigation reports
- Send investigation report to the council
- Record and store information appropriately
- Publish monthly tracker/case synopsis to the head of the HEAR cell
- Directly handle grievances raised by employees to the HEAR team or refer them back to respective HR Partners for investigation and resolution
- Address grievances from external sources or senior leadership directly
- Immediately escalate grievances qualifying as discrimination (e.g., gender, religion, ethnicity) to the HEAR cell
- If an employee is unsatisfied with HR's response and escalates to senior management via email, HR can raise SSD on behalf of the employee

Policy Access

To access relevant policies, follow this path: **MyHCLTech >> HR Studio >> Policies Studio**

Step 1- Submission of Grievance

- You must submit a written statement of the grievance setting out the reasons for the grievance to the HR Manager.
- An appropriate manager (Panel of investigation manager(s) appointed by Head HR) will invite the Employee to a meeting to discuss the grievance. This meeting, if possible, within five working days of receipt of the written grievance. At the meeting, the Employee will have an opportunity to explain the complaint in full.

Step 2- Meeting

- Employee will be invited to a meeting to consider the matter. The meeting will be held within 5 working days or as soon as is reasonably practicable following receipt of the formal grievance. Employee has the right to be accompanied to any meetings by a fellow worker or accredited trade union representative.
- After the meeting the manager will respond to the grievance in writing, as soon as reasonably practicable, informing you of the decision on the grievance and advising Employee of his/her right to appeal.

Appeal

- Any appeal against the outcome of the grievance procedure must be submitted in writing within five working days of the notification of the company's decision. The appeal must be addressed to the Head - HR department and copy to the manager who investigated and must state the grounds upon which the employee objects to the decision.
- An appropriate manager, who will not have been previously involved in the employee's case, will invite the employee to an appeal meeting. The appeal meeting will also be attended by an HR representative if possible.
- The manager shall consider additional information from the Employee and shall take steps to resolve the matters raised.
- The appeal decision will be communicated to the employee after the appeal hearing in writing and the decision of the manager shall be final and binding.

Modified Procedure

- Modified grievance procedure may apply where the Employee's contract has terminated. This modified procedure will apply if the Company was unaware of the employee's grievance before the employment ceased or the standard grievance procedure above was not commenced or completed prior to the end of the employee's employment.

- Where the modified grievance procedure applies, the employee must set out in writing their grievance and the details of it and send this to the HR department. The company will then set out its response in writing to the employee.
- The decision of the senior manager/director who considers the grievance shall be final and binding.
- There will be no right of appeal.

Process

Formal Grievance Procedure

- If the employee is dissatisfied with the decision, or the grievance is not resolved within a reasonable time by informal discussion, the employee should refer the matter to their line manager formally in writing, and provide details of the grievance.
- An appropriate manager (Panel of investigation manager /s appointed by Head HR) will invite the employee to a meeting to discuss the grievance. A meeting will be held, if possible, within five working days of receipt of the written grievance. At the meeting, the employee will have an opportunity to explain the complaint in full.
- The employee can make a request for being accompanied by a representative/companion of its choice, which can either be a fellow employee or an employee forum representative or a trade union representative or an official employed by the trade union. It is the discretion of the Company to accept this request keeping in view the reasonableness of the request.
- An appropriate manager shall investigate the grievance and its background. The manager shall take any steps necessary to resolve the matters raised and shall give a written decision to the Head – HR, if possible within ten working days of the meeting referred to above.
- On receiving the written decision the Head – HR will notify the employee that they have a right of appeal against this decision if the employee is not satisfied with it.

Annexure

 [PF_8285_SSD Raising Mechanism.pdf](#)

Annexure 1 : Illustrative List of Malpractices and Events

- Unethical business practices like bribery taken/given
- Non-financial significant favors, gifts beyond the defined guidelines
- Misuse of company funds, assets, property, facilities etc.
- Negligence causing substantial risk to public health and safety
- Manipulation of company data / records
- Financial irregularities, including fraud, or suspected fraud
- Abuse of authority Criminal offence
- Theft of confidential / proprietary / customer information
- Violation of law / regulation organization wide
- Embezzlement of company funds/assets
- Breach of employee Code of Conduct or
- Any other unethical behavior

Revision History:

Version	From	To	Description	Author	Approved By
1	15 Feb 2019	24 Jan 2022	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
2	25 Jan 2022	14 Jun 2023	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
3	15 Jun 2023	-	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

Version	From	To	Description	Author	Approved By
1	09 Nov 2020	-	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

Version	From	To	Description	Author	Accepted By
1	01 Sep 2016	31 Aug 2016	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head
2	01 Oct 2023	-	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

Version	From	To	Description	Author	Approved By
1	08 Jan 2016	-	First Copy	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Annexure

Version	From	To	Description	Author	Approved By
1	13 Oct 2009	05 Mar 2014	First Copy	-	-
2	06 Mar 2014	31 May 2021	Revision	-	-
3	01 Jun 2021	-	Revision	HR Policy & Compliance CoE	HR Policy & Compliance CoE Head

Glossary

Term	Definition
POSH	Prevention of Sexual Harassment
ABAC	Anti-Bribery and Anti-Corruption Policy of the Company

COBEC	Code of Business Ethics and Conduct
Company	HCLTech Ltd. And its subsidiaries worldwide
Employee	A person on the payrolls of the Company, including expatriates subject to secondment/deputation letter, if any
HR	HR Partner of employee/ representatives of HR Department
Reporting Manager	Any Employee or affiliated company personnel exercising authority or supervision over an Employee
EEO	Equal Employment Opportunity
PMO	Program/Project Management Officer

Glossary

In these terms following definitions shall apply, unless stated otherwise:

- "Company" refers to HCL TECHNOLOGIES UK Ltd.
- "Employee" refers to a person who is on the payrolls of the Company including but not limited to permanent/ part-time/fixed term/ expatriates working on work visa issued by appropriate authority, if any;
- "HR" refers to HR Employee Partner of the Employee / Geo HR for that respective geography;
- "iTime" refers to an internal application that captures daily working hours of Employees.
- "L1 Head" refers to any other Employee of the Company or its affiliates who is authorized by the management to head a line of business;
- "L2 Head" refers to any other Employee of the Company or its subsidiaries who is authorized by the management to head business unit(s), within a particular line of business;
- "L3 Head" refers to any other Employee of the Company or its subsidiaries who is authorized by the management to head business unit(s), under the supervision of L2 Head (if any), within a particular line of business;
- "L4 Head" refers to any other Employee of the Company or its subsidiaries who is authorized by the management to head a one of the business unit within a particular line of business;
- "Reporting Manager/Line Manager" refers to any other Employee of the Company or its affiliated companies, who by nature of his duties, exercises authority or supervision or control over an Employee during the course of this normal duty hours;

- "Grievance" refers to any circumstance regarded as just cause for complaint.
- "Circumstance" refers to a fact or condition connected with or relevant to an event or action.

Glossary

Grievance	A type of problem, concern or complaint related to any aspect of work or the working environment.
ACAS Code	The Advisory, Conciliation and Arbitration Service (ACAS) is a publicly funded agency that provides advice to both employers and employees on industrial relations issues. It offers guidance, conciliation, mediation and arbitration upon request where there is a dispute between a worker, or a union, and an employer. It produces helpful Codes of Guidance on issues such as disciplinary and grievance procedures.
Investigating Manager	The line manager (or more senior manager) who will carry out any investigatory interviews.
Hearing Manager	The manager (or more senior manager) who will conduct the hearing.

Keywords

Grievance Redressal, Protocol, Transparency, Accountability, Employee Well-being, Anonymity, Resolution, Concerns, Swift Action, Inclusivity, Policy, Grievance redressal Protocol, Corporate Governance

Keywords

Grievance redressal, Grievance process

Keywords

Grievance Redressal, Grievance process

Keywords

Grievance Policy, Grievance procedure

Disclaimers

The company reserves the right to alter, append or withdraw this policy either in part or in full based on management's discretion along with Unions or Work Council approval/discussions (as applicable). All procedures as per the law of land to be adhered to prior to policy launch.

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Policy History

Modified Date	Version No.	From	To	Reason for creation / updatation	Author	Approved by
9 Jul, 2025	1	9 Jul, 2025		Launch in Policy Studio	Pankaj Kumar(Ent HR-I&C-I&C-Policy-Policy)	Srinivasan Govindan(Ent HR-I&C-I&C-Policy-Policy)