

FORMAL GRIEVANCES MECHANISM/COMPLAINTS HANDLING SYSTEM - PIPING SYSTEM PTE. LTD.

1. Introduction

Piping System Pte. Ltd. (hereinafter referred to as "the Company") is committed to maintaining the highest standards of integrity, fairness, and accountability in all its operations. A robust and transparent formal grievances mechanism and complaints handling system is essential to address concerns raised by stakeholders promptly and equitably. This document outlines the structured process for receiving, investigating, resolving, and documenting grievances and complaints, ensuring that all parties are treated with respect and that issues are addressed in a timely manner.

2. Purpose and Objectives

The primary purpose of this system is to provide a fair, confidential, and efficient process for stakeholders to voice their concerns related to the Company's operations, policies, or practices. The key objectives are:

- To encourage open communication of grievances without fear of retaliation.
- To ensure all complaints are handled impartially and resolved promptly.
- To identify root causes of issues and implement corrective actions to prevent recurrence.
- To maintain trust and confidence among stakeholders, including employees, customers, suppliers, communities, and shareholders.
- To demonstrate compliance with legal and regulatory requirements related to dispute resolution and stakeholder rights.

3. Scope of Application

This grievances mechanism applies to all stakeholders interacting with the Company, including but not limited to:

- Employees (permanent, temporary, contract, and part-time).
- Customers and clients.
- Suppliers, contractors, and subcontractors.
- Community members residing near Company facilities or affected by Company operations.
- Shareholders and investors.
- Visitors to Company premises.

The system covers all types of grievances and complaints, such as:

- Violations of Company policies (e.g., anti-corruption, labor, health and safety, environmental).
- Unethical behavior, discrimination, harassment, or unfair treatment.
- Concerns related to environmental impact (e.g., pollution, waste management).
- Issues with product quality, service delivery, or contractual obligations.
- Misconduct by employees, managers, or representatives of the Company.
- Any other matter that may affect the Company's reputation, operations, or stakeholder relationships.

4. Principles Guiding the System

All aspects of the grievances mechanism are governed by the following principles:

- **Confidentiality:** Information related to grievances is treated as confidential, with access restricted to those directly involved in the handling process, unless disclosure is required by law or with the consent of the complainant.
- **Impartiality:** Investigations and resolutions are conducted without bias, ensuring that all parties are given a fair opportunity to present their views.
- **Timeliness:** Grievances are addressed promptly, with clear timelines for each stage of the process.
- **Accessibility:** Multiple channels are provided for submitting grievances, ensuring ease of access for all stakeholders.
- **Non-Retaliation:** The Company strictly prohibits any form of retaliation against individuals who submit a good-faith grievance. Retaliatory actions will result in disciplinary measures, including potential termination of employment or contracts.
- **Transparency:** The process and outcomes of grievances are communicated to the complainant in a clear and understandable manner, while maintaining confidentiality where necessary.

5. Submission Channels for Grievances

Stakeholders may submit grievances through the following channels, ensuring flexibility and accessibility:

5.1 Direct Reporting (Employees)

Employees may report grievances directly to:

- Their immediate supervisor or manager, provided the supervisor is not involved in the issue.
- The Human Resources (HR) Department.
- The Company's Compliance Officer.

- Members of the CSR Committee.

5.2 Anonymous Hotline

A toll-free, 24/7 anonymous hotline ([Phone Number]) is available for all stakeholders to submit complaints without disclosing their identity. Calls are handled by a third-party service provider to ensure confidentiality.

5.3 Email

A dedicated, secure email address ([Email Address]) is monitored by the Compliance Officer. Grievances submitted via email should include relevant details such as the nature of the issue, date, time, location, and any supporting evidence.

5.4 Postal Mail

Physical complaints can be sent to:

Compliance Officer

Piping System Pte. Ltd.

[Company Address]

Marked "Confidential—Grievance Handling"

5.5 Online Portal

A secure, password-protected online form is available on the Company's website ([URL]). The portal allows stakeholders to submit grievances electronically, upload supporting documents, and track the status of their complaint.

5.6 In-Person

Stakeholders may visit the Company's main office during business hours and meet with the Compliance Officer or a designated representative to submit a grievance in person. Appointments can be scheduled by calling [Phone Number].

6. Handling Process

The grievances handling process consists of the following stages:

6.1 Acknowledgment

- Upon receipt of a grievance, the Company will acknowledge it in writing (via email, letter, or portal notification) within 3 business days.
- The acknowledgment will include a unique reference number for tracking the grievance, the name of the assigned handler (if applicable), and an outline of the next steps.

6.2 Initial Assessment

- The Compliance Officer or designated investigator will conduct an initial assessment within 5 business days of acknowledgment to determine:
 - The nature and severity of the grievance.
 - Whether the grievance falls within the scope of this system.
 - The appropriate resources and expertise required for investigation.
 - Whether the issue requires immediate action to prevent harm (e.g., safety concerns).

6.3 Investigation

- A dedicated investigator will be assigned to the case. The investigator will be independent of the issue and parties involved to ensure impartiality.
- The investigation will include:
 - Reviewing relevant documents, records, and evidence.
 - Interviewing the complainant, alleged parties, and any witnesses.
 - Consulting with relevant departments (e.g., HR, Legal, Operations) as needed.
 - Engaging external experts or auditors for complex cases (e.g., environmental violations, financial misconduct).
- The investigation will be completed within 30 business days of acknowledgment. If an extension is necessary due to complexity, the complainant will be notified in writing with a revised timeline (not exceeding an additional 15 business days).

6.4 Resolution and Decision-Making

- After completing the investigation, the investigator will prepare a report outlining findings, conclusions, and recommended actions.
- The report will be reviewed by the Compliance Officer and relevant stakeholders (e.g., HR Director for employee-related issues, CSR Committee for community concerns).
- A decision on the appropriate resolution will be made within 10 business days of the investigation's completion. Possible resolutions include:
 - Corrective actions (e.g., policy revisions, training, process improvements).
 - Disciplinary measures (e.g., warnings, suspension, termination) in accordance with Company policies.
 - Remediation for affected parties (e.g., compensation, apology, service recovery).
 - Referral to external authorities if criminal activity is suspected.

6.5 Communication of Outcome

- The complainant will be informed of the outcome in writing within 5 business days of the decision.
- The communication will include:
 - A summary of the findings.
 - Details of the actions taken or to be taken.
 - Information on the appeal process, if applicable.
- Confidentiality will be maintained regarding sensitive details that could identify other parties.

6.6 Implementation of Actions

- The Company will implement the approved resolution within the specified timeframe (typically 15–30 business days, depending on the nature of the action).
- The Compliance Officer will monitor the implementation to ensure effectiveness.

7. Appeal Process

If the complainant is dissatisfied with the resolution, they may file an appeal within 15 business days of receiving the outcome. The appeal process involves:

- Submitting a written request for appeal, including the reasons for dissatisfaction and any additional evidence.
- Review by an Appeal Panel consisting of senior management not involved in the initial investigation (e.g., Chief Executive Officer, Chief Operating Officer, independent director).
- The Panel will conduct a review of the case, which may include re-interviewing parties or examining new evidence.
- A final decision will be communicated to the complainant within 20 business days of receiving the appeal. The decision of the Appeal Panel is binding.

8. Record-Keeping and Documentation

- All records related to grievances, including submissions, acknowledgments, investigation notes, reports, resolutions, and appeals, will be stored securely in electronic or physical format.
- Records will be retained for a minimum of 5 years from the date of resolution, in compliance with legal and regulatory requirements.
- Aggregate data (without identifying information) will be analyzed to identify trends, recurring issues, and areas for improvement in Company policies and practices.

9. Training and Awareness

- All employees, particularly managers, supervisors, and those involved in handling grievances, will receive regular training on the grievances mechanism, including:
 - How to recognize and respond to grievances.
 - Maintaining confidentiality and impartiality.
 - Following the investigation process.
 - Preventing retaliation.
- The Company will raise awareness of the grievances mechanism among all stakeholders through:
 - Inclusion in employee handbooks, supplier contracts, and community outreach materials.
 - Posters in Company premises with information on submission channels.
 - Announcements on the Company website and social media platforms.

10. Monitoring and Review


- The effectiveness of the grievances mechanism will be monitored regularly by the CSR Committee, using metrics such as:
 - Number of grievances received, by type and stakeholder group.
 - Average time to resolve grievances.
 - Resolution rate (percentage of grievances resolved to the complainant's satisfaction).
 - Number of appeals and their outcomes.
 - Implementation rate of corrective actions.
- The system will be reviewed annually to assess its efficiency, fairness, and compliance with legal requirements. Revisions will be made as necessary to improve the process, based on stakeholder feedback and emerging best practices.

11. Responsibility and Accountability

- The Compliance Officer is responsible for overseeing the day-to-day operation of the grievances mechanism, ensuring adherence to the process, and reporting to the CSR Committee and Board of Directors.
- Managers and supervisors are accountable for promptly escalating grievances to the appropriate channels and cooperating with investigations.
- Failure to comply with this system, including retaliation against complainants or mishandling of grievances, will result in disciplinary action, up to and including termination of employment or contracts.

12. Conclusion

Piping System Pte. Ltd. is committed to maintaining a fair and effective formal grievances mechanism that upholds the rights of all stakeholders. By ensuring that concerns are addressed promptly, impartially, and transparently, the Company aims to foster a culture of trust, accountability, and continuous improvement.

Approved by: 

Date: 9th July , 2024

Piping System Pte. Ltd.

