

KFIN TECHNOLOGIES LIMITED

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Grievance Redressal Policy

Document Revision History

Version	Date of Release / Revision	Prepared / Revised By	Reviewed & Approved By		Reasons for revisions
			Name	Date	
1.0	2 nd Apr 2019	Raja Sulaxana Rani D	Sumanth Rao Thanam	1 st Apr 2019	Initial version
1.1	12 th Dec 2019	Raja Sulaxana Rani D	Sumanth Rao Thanam	11 th Dec 2019	Change of Logo and Name from Karvy Fintech Private Limited to KFin Technologies Private Limited
1.2	20 th Nov 2020	HR Team	HR Head	19 th Nov 2020	Changes made in the committee
1.2	19 th Nov 2021	HR Team	HR Head	18 th Nov 2021	Reviewed and no changes
1.3	11 th Feb 2022	HR Team	HR Head	10 th Feb 2022	Changes made in the committee
2.0	11 th Apr 2022	HR Team	HR Head	8 th Apr 2022	"KFin Technologies Private Limited" has been replaced with "KFin Technologies Limited (Previously known as KFin Technologies Private Limited)" and "KFPL", "KCPL" is replaced with "KFintech"
3.0	1 st May 2023	Neelima Bheemagari	Kiran Aidhi	1 st May 2023	Added Level of Grievances
4.0	October 05, 2023	HR Team	Board of Directors	October 05, 2023	N.A

Distribution

This document has been distributed to:

Version No.	Board of Directors Approval and Distribution Audience
V4.0	This procedure document is reviewed and approved by KFintech Board of Directors and is distributed to all Employees of KFintech, External users & Management of KFintech

Grievance Redressal Policy

1. Purpose

- 1.1 KFin Technologies Limited (the "**Company**") is an equal opportunity employer. It expects that all its employees shall without exception observe and exhibit a high degree of professional ethics, fairness & transparency in conducting themselves in the discharge of their duties and responsibilities in line with the Company's Code of Conduct including all other organizational policies and the laws in force in this regard.
- 1.2 The purpose of the Grievance Redressal Policy (the "**Policy**") is to enable the employees who feel aggrieved by unfair treatment met by him/her in the Company to approach the grievance redressal committee (the "**Committee**") for seeking remedial measures.
- 1.3 This Policy, as amended from time to time, shall be made available at Human Resource Information System ("**HRIS**") portal.

2. Scope

- 2.1 This Policy applies to all the employees of the Company. Any employee may raise an issue against ill treatment, unfair treatment, bias and victimization of any kind by any other employee or group of employees (the "**Grievances**"). The Committee shall resolve any issue arising out of the Grievances defined in this Policy.
- 2.2 This Policy may not be used as a defense by any employee against whom an adverse personnel action has been taken for legitimate reasons or cause under Company's rules and policies. It shall not be a violation of this Policy to take a disciplinary action against an employee whose conduct or performance warrants such action, separate and apart from that employee making a disclosure.

3. Raising a Grievance

- 3.1 For the purpose of this Policy, Grievance by an employee is defined as, "*expression of complaint against perceived unfair treatment, ill treatment, bias or favoritism by an employee or a group of employees.*"

4. Grievance Redressal Committee

- 4.1 The Committee shall consist of 3 (three) members constituted for effective functioning of this Policy having the following roles and responsibilities:
 - a) To receive and take cognizance of the complaint so made by the aggrieved employee (the "**Complainant**").
 - b) To give an opportunity to the Complainant with or without witnesses to raise Grievances to ascertain the allegations and the facts therein.
 - c) To investigate the complaint so made by the Complainant upon, interrogating the accused and witnesses, and verify such records (online or offline) that may be necessary under the circumstances to ascertain the facts of the Grievances.
 - d) If it may so deem fit and necessary under the circumstances, the Committee may investigate the complaint by appointing an investigator (internal or external) to arrive at the facts and merits of the complaint and submits investigation report to it.
 - e) To arrive at an investigation report, deliberate on it and take appropriate remedial action.

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4.2 The Committee shall report to the Director and CEO of the Company. The Committee presently consists of the following:

Name	Designation and Contact Information
Mario Sylvester Roche	COO
Kiran Aidhi	CPO
Vivek Mathur	CFO

5. False Complaint(s)

5.1 An employee who knowingly makes false allegation to the Committee shall be subject to disciplinary action as per Company's Code of Conduct and terms of employment which may include the following:

- a) Written apology
- b) Warning
- c) Reprimand or censure
- d) Withholding promotion
- e) Withholding pay rise or increments
- f) Suspension during the investigation
- g) Termination from service without notice and compensation
- h) Undergoing counseling session
- i) Carrying out community service for such period as the Committee may specify

5.2 This Policy may not be used as a defense by an employee against whom a departmental action has been taken as per Company's code of conduct & terms of employment.

6. Reporting and investigation process

6.1 Any employee, who has a Grievance against another employee or group of employees, should approach the Committee with detailed complaint in writing on www.convercent.com/report / Toll free number 000- 8001-004-175 / 000-8001-003-428.

6.2 The Committee shall acknowledge the receipt of the complaint within 48 (forty eight) hours of the receipt of such complaint.

6.3 The Committee shall appropriately and expeditiously investigate the complaint, call for information and examine the same as it may deem fit and necessary under the circumstances.

6.4 If required, depending upon seriousness of the issue, the Committee shall have the right to outline detailed procedure for an investigation.

6.5 The Committee shall have a right to call for any information/document and examination of any employee of the Company or other person(s), as they may deem appropriate for the purpose of conducting investigation under this Policy.

6.6 The Committee shall share investigation report and recommend the necessary remedial steps, measures and actions to the Director and CEO of the Company to redress the grievances of the Complainant.

6.7 All information regarding the Grievance, investigation etc. has to be kept highly confidential by all the parties

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involved in the redressal cycle including the Complainant.

7. Appeal/Escalation

- 7.1 In case the Complainant is not satisfied with the action taken by the Committee, he / she may prefer an appeal to the Director and CEO ("**Appellate Authority**") by writing to him directly. The appeal shall be disposed by the Appellate Authority within 30 (thirty) days of receipt of such appeal. The direction so passed by the Appellate Authority shall be final and binding.
- 7.2 In case the Committee does not acknowledge the Complaint so made by the Complainant within 7 (seven) working days, he / she may escalate the complaint to the Appellate Authority. In case of such escalation, the Appellate Authority shall remand the complaint to the Committee to attend to it immediately and report its closure to the Appellate Authority.

8. Quarterly Report

- 8.1 The Committee shall prepare a quarterly report at the end of every quarter ("**Report**") and submit such Report to the Board of Directors.
- 8.2 The Report shall contain the following details:
- a) Number of complaints or Grievances received in the quarter;
 - b) Number of complaints or Grievances disposed-off during the quarter with details of action taken; and
 - c) Number of cases pending for more than 90 (ninety) days.

9. Level of Grievances

Level 1:

- a) Wherein the aggrieved employee can communicate with his/her immediate supervisor with all the required details such as name, designation, employee id
- b) The supervisor should acknowledge the receipt of the grievance, if possible
- c) immediately. The supervisor should redress the grievance within a period of two
- d) working days.

Level 2: If the concerned employee is not satisfied with the above response from his/

- e) her immediate supervisor he/she can submit the grievance along with the reply
- f) to the HOD. She/he would hear out the grievances of individuals and counsel them.

Level 3:

- g) If the grievance still persists, a formal grievance would be lodged and forwarded to the Grievances Redressal Committee that consists of COO, CPO and CFO.