

Apollo Tyres Ltd.

Work Instruction for Grievance Redressal

Introduction

Sustainability has been identified as one of the drivers of growth for enabling excellence. Driven by its pillars of sustainability and its vision, Apollo Tyres Ltd. (ATL) has committed to associate with its supply chain partners who act responsibly towards environment and society. It works towards a sustainable growth and sustainable sourcing to minimize its impact on environment and society while making its procurement decisions.

ATL has adopted ISO 20400 guidance standard on Sustainable Procurement and integrated into its procurement practices and decision-making processes. In-line with the guidance standard's requirement, Supplier Code of Conducts have been rolled out to suppliers to share the requirements and expectations. Apollo Sustainable Natural Rubber Policy (ASNRP), the Code of Conduct for Natural Rubber Suppliers, was released in 2021, and built around GPSNR (Global platform for Sustainable Natural Rubber) Policy Framework. Apollo Tyres Sustainable Procurement Policy (ATSP), a revised version of Apollo Partnership Pact, is applicable to all raw material suppliers other than natural rubber and was released in May 2022.

Apollo Tyres considers its stakeholders an important part of its supply chain and aims to resolve any grievance in a fair, unbiased and timebound manner. This procedure is defined as a supplement to ASNRP and ATSP to handle any grievances that are reported by its stakeholders in the supply chain. Grievances can be raised, anonymously or otherwise, to report any non-conformance related to the supplier code of conducts.

This Grievance redressal mechanism is a non-judicial grievance mechanism which is aligned to United Nations Guiding Principle Effectiveness criteria 31. The mechanism is legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue

Objective and Scope:

This procedure is applicable to its internal and external stakeholders including all raw material suppliers (Tier-1 and Sub-Tier Suppliers) of ATL for reporting any violation with reference to the supplier code of conducts – ASNRP and ATSP. Grievances logged under this policy will be addressed in a timely manner and investigation outcomes will be shared with relevant parties transparently.



Grievance Redressal Mechanism

Grievance Reporting:

Grievances can be reported by any stakeholders (Grievance Raiser) in relation to any violation of requirements mentioned in the Supplier Code of Conducts. The grievance can be reported in one of the following ways –

Email : Email to compliance.officer@apolloytyres.com

Direct Post :

- For Natural Rubber: 9 Temasek Boulevard, #42-01, Suntec Tower-2, Singapore 038989
- For Other RM Category: Apollo Tyres Ltd, 7 Institutional Area, Gurugram, Haryana, 122001 India

Fax : +65 6238 6262

The grievance reporting should include the following details –

- First Name, Last Name
- Name of the Organization
- Associated Function
- Organization Address
- Email Address
- Detailed description of Grievance
- Evidence to support grievance

Grievances can be made anonymously also. However, this could constraint the effort to further understand, clarify and initiate any follow-ups with respect to the issue being reported. The default and preferred language for any grievance reporting will be English.

Grievances reported will be assessed by the internal Grievance Resolution Panel for its admissibility and all concerned parties will be apprised about the outcome by the Complaint Redressal Officer (CRO).



Roles and Responsibilities

A **Complaint Redressal Officer (CRO)** will be identified within Apollo Tyres to manage the grievance redressal through the defined process. The complaint redressal Officer will serve as the contact point for Reporting Party, Respondent, Third party/Mediation Party and the Grievance Resolution Panel

A **Grievance Resolution Panel** may be formed comprising of cross functional team (CFT), with relevant experience, as required on a case-to-case basis, by the Group Head of Corporate Procurement function.

The CFT, headed by Corporate Sustainability and CSR / Internal Audit Team, shall comprise of the following function / representatives drawn from at least three of the following functions...

1. Corporate Sustainability and CSR Team
2. Internal Audit Team
3. Legal/Secretarial
4. Procurement
5. R&D
6. Accounts & Finance
7. HR
8. Corporate Communications

This committee will assist towards resolution of the grievance raised, while considering the scope of the issue registered, requirements of mediation or any other third party, etc.

The communication to grievance raiser and respondent will be through the CRO.

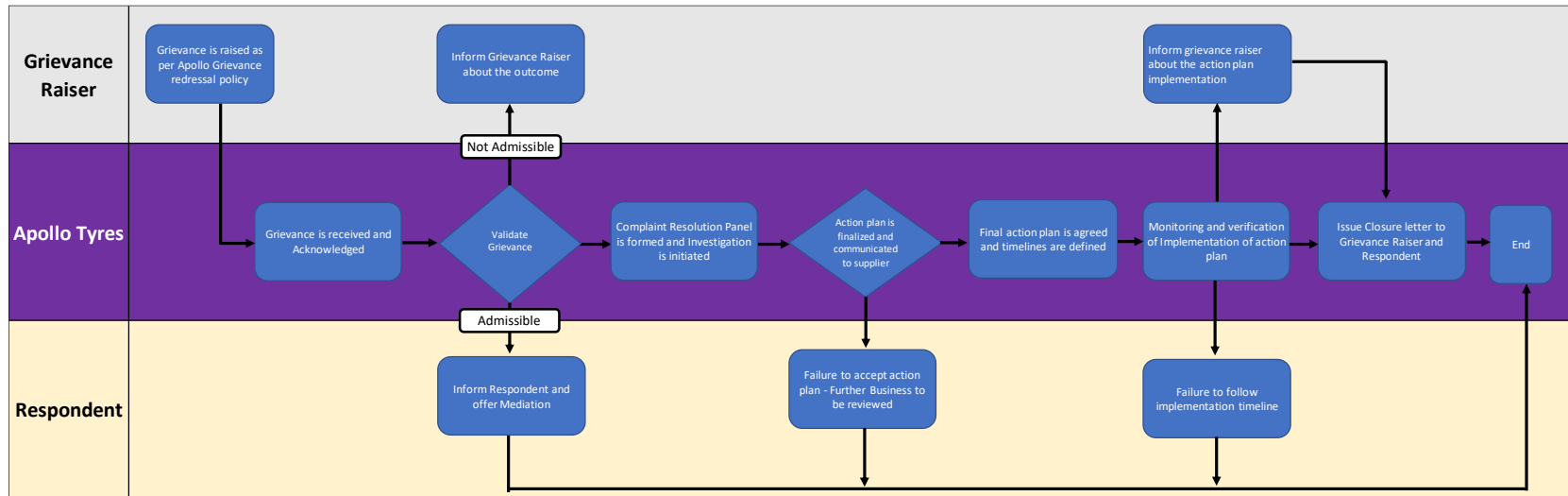
The Grievance Resolution Panel will update on the status and disposition of grievances to the Sustainability Steering Committee on a periodic basis.

Grievance Redressal Workflow

The Grievance redressal process has been defined as a guideline for resolving any grievances raised under this policy. The timelines and process flow for redressal is included in this document.

S. No	Activity	Timeline
1)	Acknowledgment of Grievance	1 Week
2)	Validation of Grievance	2 Week
3)	Investigation and Action plan finalization	1-2 months
4)	Time period for Implementation of action plan	Upto 6 months
5)	Verification of Implementation	2 Weeks
6)	Communicate Closure of Issue	1 Week

Redressal Process



1. Grievance can be raised as per the reporting format to the email ID mentioned above in grievance reporting section.
2. Upon receiving the grievance, It is acknowledged by responsible executive from Apollo Tyres.
3. The grievance will be validated before logging in as an official issue. Validation of the issue is based on factors (not limiting to) such as –
 - a. if the issue is related to Apollo Tyres' Supply Chain
 - b. If the issue reported includes specifics about the violation
 - c. If the Violation reported actually violates the Supplier Code of Conducts
4. If the issue is validated and found admissible, then a mediation is offered between grievance raiser and respondent to resolve the issue. If successful, this issue will be closed. Else, further investigation into the issue will be initiated.
5. A Grievance Resolution Panel may be formed, in case required, to assist in the investigation in an unbiased, and equitable way. The grievance resolution panel will finalize action plan and share with the grievance raiser and respondent for concurrence.

6. Upon agreement on action plan, Respondent has to share agreement to action plan and share timeline for implementation of action plan. In case respondent fails to do so, further business will be put on hold and reviewed with Group Head-Corporate Procurement for future actions
7. Implementation of Action plan will be monitored as per the timelines agreed. Updated status of implementation of action plan will be shared with the Grievance Raiser and Grievance Resolution Panel.
8. Closure letter to be issued to grievance raiser and respondent after verifying implementation.

Note :

- The time taken for investigation of the grievance reported may vary depending upon the details of the issue available and the response lead time involved. The actual implementation timeline provided is based on assumption that the implementation of action plan will involve multiple parties including procurement of items, if required. Any deviation from the stipulated timeline may be looked on case to case basis.

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