



JAMNA AUTO INDUSTRIES LIMITED

Grievance/Complaint Redressal System

(updated as of 20th March, 2025)

Purpose / Objective

This Policy outlines Company's mechanism for receiving, addressing, and resolving complaints and grievances from both internal and external stakeholders. The objective is to ensure that all concerns, grievances and complaints are handled in a fair, transparent, and timely manner, reflecting Company's commitment to maintaining positive and cordial relationships with its stakeholders.

Coverage

This Policy covers all permanent and temporary workers/employees of the Company and its subsidiaries, as well as to external stakeholders, including agents, contractors, consultants, customers, dealers, distributors, retailers, service providers, suppliers, vendors, investors, and local communities.

Grievances Handling

All grievances and complaints will be addressed in line with the following guidelines, unless otherwise specified by applicable laws and regulations or authorities:

1. Workers, employees and stakeholders are encouraged to lodge their grievances without fear of oppression and victimization.
2. Grievances will be handled with confidentiality to protect the privacy of all parties involved.
3. Grievances will be redressed fairly, impartially, and in accordance with the principles of natural justice.
4. Grievances shall be made in writing in good faith giving complete facts, details of the issues raised and identity of complainant.
5. Grievances should be factual and not speculative or in the nature of offering suggestions or interpretation or conclusion or seeking guidance, or requesting explanations.
6. Following will not be considered as a grievance:
 - (a) Issue or matter arising out of any agreement or contract or pertaining to commercial matters in normal course of Company's business will be managed by the concerned departments, as per terms of agreement, contract, or arrangement with business partner. For instance, issues involving vendors and customers related to the supply or receipt of materials, goods, services, or projects will be resolved according to the agreed-upon procedures with concerned vendors or customer;



- (b) Grievances related to any issue or matter pending before any Court, Tribunal or Arbitrator or any other forum or authority or related to interpretation or compliance with order of any Court, Government or Regulatory authority or Company's Management;
- (c) Grievances which are in nature of legal notice;
- (d) Grievances made after expiry of their period of limitation prescribed under any applicable law or regulation or by any authority or under any Company's policy;
- (e) Grievances that are abusive, frivolous, vexatious.

Workers & Employees

Units have a grievance redressal procedure for permanent workers and employees which aims at early settlement of their grievances and at the lowest possible level. Grievance Redressal Committee has also been setup for addressing grievances or complaints and resolving disputes.

Informal Resolution: Employees and workers are encouraged to first attempt to resolve their grievance informally with the person involved in the grievance (e.g., a supervisor, colleague, or manager) in a calm, respectful manner. If the employees or works are not comfortable in doing so, they may discuss their grievance with immediate shift supervisor and speak to him/her on the subject matter.

Formal Grievance: If the informal resolution is unsuccessful, or if employees or workers choose not to pursue the informal method, the grievance will be addressed through the formal grievance procedure as follows:

1. **Submission of complaint:** The employee or worker shall submit a written complaint to his/her supervisor/department head or can put his/her complaint in the grievance box kept at factory gate for this purpose.
2. **Resolution:** The concerned supervisor/department head shall conduct an investigation into the grievance, gathering relevant evidence and information from parties involved. If needed, a formal meeting may be held with the complainant, the person involved, and relevant parties like management or worker representatives. The concerned supervisor/department head will dispose the grievance within 3 working days and propose a resolution which may include corrective action, mediation, or other measures to resolve the issue.
3. **Appeal:** If any party involved in the grievance is not satisfied with the investigation or outcome, they may appeal to the HR head of respective location within 3 working days of receiving the supervisor's/department head's decision. Unit HR Head will resolve the grievance within 5 working days.



4. Further, appeal can also be made by any of the party involved in the grievance to the chairman of the Grievance Redressal Committee within 3 working days of receiving of department head's decision. The Committee will work to resolve the issue to the satisfaction of all parties within 7 working days of receiving the appeal.
5. The party who is aggrieved by the decision of the Grievance Redressal Committee has the right to appeal to the respective Unit Head. Appeal should be filed within 3 working days of receiving the decision from the Committee. The Unit Head shall decide the appeal within 15 working days from the date appeal is received.
6. **Follow-up:** After a resolution is reached, there may be follow-up to ensure the issue has been fully addressed and that no further problems arise.

Investors

The Company has appointed M/s Skyline Financial Services Private Limited as the Registrar and Transfer Agent ("RTA"). The RTA is responsible for handling the transfer, transmission, and transposition of shares, issuing duplicate share certificates, providing new certificates in case of torn or mutilated certificates, and addressing shareholder complaints, including those related to share transfers, non-receipt of balance sheets, non-receipt of declared dividends, etc.

The Board of Directors of the Company has established a Stakeholder's Relationship Committee in compliance with applicable laws to ensure timely attention to shareholder grievances. The Committee is responsible for safeguarding the interests of investors, addressing their grievances, and overseeing the performance of the Registrar and Transfer Agent. The Committee consists of three Directors, with the Chairperson being an Independent Director.

Investors can lodge grievances related to these matters, or any issues concerning the Company's securities, either to the Company or the RTA. Upon receiving a grievance, the Company will promptly forward it to the RTA for resolution. Investors should provide their name, folio number, DP ID/Client ID, details of the complaint, and all supporting documents while giving their complaint.

The RTA, after verifying the investor's credentials and checking the relevant records, will provide initial response to investor within 7 working days of receiving the complaint. The response may include a request for additional information or details to verify the investor's credentials and to further review the complaint. Once all the necessary information and documents are provided, the RTA will make every effort to resolve the complaint within 15 working days like providing the requested information or documents, crediting any unpaid dividends, updating the investor's KYC details, or addressing other concerns raised by the investor.



If the investor is not satisfied with the RTA's response, or if the complaint remains unresolved despite providing all required information and documents, the investor may file a grievance with the Securities and Exchange Board of India (SEBI) through the SCORES 2.0 platform. The investor can also file grievances directly at SCORES 2.0 without the need to submit a formal request or complaint to the Company or RTA.

If the investor's grievance still remains unresolved to their satisfaction, they may seek dispute resolution through SEBI's Online Dispute Resolution Portal ("ODR Portal"). The link to the ODR Portal and related SEBI circular is available on the Company's website at www.jaispring.com.

Following are contact details of RTA, Company and various authorities for the investor to address their grievances:

1	RTA	Mr. Parveen Sharma Skyline Financial Services Private Limited D 153/A, 1st Floor, Okhla Industrial Area, Phase-I, New Delhi-110020 Ph. No. +91- 11-40450193- 97 E-mail: parveen@skylinerta.com
2	Compliance Officer	Mr. Praveen Lakhera, Compliance Officer Jamna Auto Industries Limited 4th Floor, Tower B, Vatika Mindscapes, Mathura Road, Sector-27D, Faridabad-121003, Haryana Ph. No. +91-129-4006885 E-mail: investor.relations@jaispring.com
3	Nodal Office for IEPF matters	Mr. Praveen Lakhera, Nodal Officer Jamna Auto Industries Limited 4th Floor, Tower B, Vatika Mindscapes, Mathura Road, Sector-27D, Faridabad-121003, Haryana Ph. No. +91-129-4006885 E-mail: investor.relations@jaisprin.com
		Ms. Pooja Sachdeva, Deputy Nodal Officer Jamna Auto Industries Limited 4th Floor, Tower B, Vatika Mindscapes, Mathura Road, Sector-27D, Faridabad-121003, Haryana Ph. No. +91-129-4006885 E-mail: pooja.s@jaispring.com
4	SEBI Scores	https://scores.sebi.gov.in
5	ODR Portal	<ul style="list-style-type: none">▪ https://jaispring.com/smart-odr.html▪ https://smartodr.in/login

External Shareholders

The Company recognizes that resolving grievances effectively is crucial for fostering trust and building long-term relationships with its external stakeholders. Our primary approach to address their grievances is through active engagement, open communication, and a collaborative problem-solving approach. Following is the engagement mechanism with external stakeholders, other than investors:

Stakeholder Group	Channels of communication	Purpose of engagement
Vendors & Suppliers	Meetings, emails, Pamphlet, Advertisements, Events and Phone calls.	Maintaining Relationships, Grievances handling, maintaining the quality standards, orders and audits.
Customers	Meetings, Emails, Pamphlet and Advertisements.	Understanding Customers requirements, Grievances handling and maintaining the quality standards.
Communities	Community meetings.	For CSR initiatives, and social impact of our business operations on communities.
Government Bodies	Notices, emails, meetings, Regulatory audits and inspections.	Regulatory compliances and requirements of both State & Central Government.

Stakeholders whose concerns remain unresolved through the engagement mechanism can submit a formal grievance to grievance@jaispring.com within the contours of this policy, for further review. The grievance will be addressed through the following procedure.

- 1) Upon receipt a grievance will be reviewed and acknowledged and additional information, details, or the complainant's credentials may be requested if necessary to ensure proper addressing and resolution of the grievance.
- 2) The grievance will then be evaluated for an initial assessment and further investigated, if required. The Grievance Officer shall involve relevant, unrelated unit heads or department heads in the evaluation, investigation of grievance and formulation of its resolution.
- 3) The Grievance Officer will evaluate the grievance and make an initial assessment within 15 working days of its receipt to determine whether the grievance is abusive, frivolous, or vexatious. If the grievance is found to be abusive, frivolous, or vexatious, it will be rejected, and the complainant will be informed accordingly.



- 4) A genuine complaint shall be investigated within 45 working days of receipt. This may involve discussions with complainant (if not anonymous) including possibility of alternative agreement with the complainant. Upon completion of the investigation, a report will be prepared with recommendations for proposed resolution or corrective action of the grievance. Grievance Officer will communicate such resolution or corrective action of the grievance to the complainant and discuss the same with complainant.
- 5) Complaints received anonymously will be evaluated and investigated in the same manner as non-anonymous complaints, but no feedback or response will be issued.
- 6) If a grievance is not resolved through above procedure, efforts will be made to resolve it by involving senior management, independent or neutral parties, or relevant authorities, as necessary and appropriate.

Prevention of Sexual Harassment

The Company has constituted an Internal Complaint Committee (ICC) under the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”). Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to the committee within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. If the complainant is unable to file the complaint within this period, the ICC may consider exceptions based on valid reasons.

The Committee shall investigate the matter in accordance with the provisions of POSH Act, as well as the Company's internal policies and procedures. Before initiating a formal inquiry into the complaint, and upon the request of the aggrieved employee, the Committee may attempt to resolve the matter through conciliation, facilitating a settlement between the complainant and the respondent.

Timelines

- (a) A complaint should be filed in writing in six copies, along with supporting documents within 3 months from the date of the incident. In the case of a series of incidents, the complaint should be filed within 3 months from the date of the last incident. The complaint should be addressed to the Internal Complaints Committee (ICC), not to any officer or employee of the Company.
- (b) ICC will review the complaint to determine if it falls under the scope of the POSH Act. If the complaint is found to be frivolous or not under the purview of POSH, complaint will be dismissed, and the complainant will be informed. This will be done within 7 working days of receipt of the complaint.
- (c) If the complaint is valid and genuine, the ICC shall send the notice along with one copy of the complaint to the respondent within 7 days of receiving a complaint.



- (d) Upon receipt of the complaint, the respondent is required to submit a reply to the ICC within 10 working days.
- (e) ICC shall complete the inquiry within 90 days from receipt of the complaint and issue inquiry report within 10 days from date of completion of inquiry including its findings and any recommendations for action.
- (f) Company's management shall to act on ICC recommendations within 60 days of receipt of the Inquiry report. Possible actions could include disciplinary measures, termination of the accused, or other necessary steps as per Company's policy in compliant is found correct. If the respondent is found not guilty, no punitive action will be taken against respondent.
- (g) Aggrieved person can appeal against decision of ICC within 90 days from the date of recommendations.

During pendency of inquiry, ICC at written request of the complainant may recommend interim relief to the complainant such as transfer of the Complainant or the Respondent, granting paid leaves to complainant or other protective measures. The interim relief aims to protect the complainant from further harm or retaliation during the inquiry and ensure a safe working environment.

Vigil Mechanism/Whistle Blower Mechanism

The Company also has a Whistleblower mechanism in place, providing an avenue for internal & external stakeholders to raise genuine concerns about unethical behavior, actual or suspected fraud, leaks of unpublished price-sensitive information, non-compliance or violations of any law, and breaches of the company's code or policies. The identity of the whistleblower is kept confidential.

Concerns can be reported to the Company Secretary, and in their absence, to the Chief Financial Officer, who shall report the matter to the Audit Committee. In exceptional cases, a complaint may be made directly to the Chairperson of the Audit Committee if no action has been taken on the earlier complaint by the Company Secretary or CFO, as applicable.

Name & Designation	Mr. Praveen Lakhera, Company Secretary & Head-Legal	Ms. Rashmi Duggal, Chairperson, Audit Committee	Mr. Shakti Goyal, Chief Financial Officer
Email	praveen@jaispring.com	rashmiduggal.rd@gmail.com	sgoyal@jaisprings.com
Address	Unit No. 408, 4th Floor, Tower-B, Vatika Mindscapes, Sector-27D, NH2, Faridabad-121003(HR.) Tel. 0129-4006885		



The Company shall safeguard the whistle-blower against victimization. No unfair treatment will be meted out to a whistle blower by virtue of his/her having made a complaint. The company will take steps to minimize difficulties, which the whistle blower may experience as a result of making complaint.

Disclosure

The Company shall publish this policy on its website and continue to make aware all the stakeholders about this policy through various other communication channels.