



# GRIEVANCE MECHANISM POLICY

## Document History

Version	Date	Prepared By	Reviewed By	Approved By	Revisions
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## 1. Introduction

- This policy is applicable to Cloudphysician International Pte. Ltd., including its subsidiaries and affiliates (hereinafter referred to as the “Company”).
- The Company intends to provide a mechanism for external and internal stakeholders which includes any individual, organization, group, or community to raise a grievance when they believe they have been adversely affected by Cloudphysician’s activities and operations. The grievance mechanisms and investigation procedures have been set up to ensure they are appropriate, relevant, and safe in the local context.
- This Policy fulfills the following principles
  - All stakeholders shall be informed of avenues to escalate their complaints within the organization
  - The complainant shall be treated fairly at all times
  - Complaints raised by the concerned stakeholders shall be dealt with courtesy and resolved in a timely manner

## 2. Scope and Applicability

This mechanism aims to provide a framework to handle the grievances of Cloudphysician’s stakeholders in a fair and transparent manner and educate them about the processes to be followed to lodge a grievance with Cloudphysician. This mechanism is applicable to Cloudphysician and its subsidiaries/affiliates.

The policy covers:

- Customers
- Employees working at all levels and grades, including directors, senior managers, officers, and other employees (whether permanent, fixed-term or temporary) as well as
- Third parties (whether consultants, contractors, interns, agency staff, agents) or any other person associated with Cloudphysician and its subsidiaries

While this mechanism provides detailed information, it cannot address every potential grievance issue that may arise. If you encounter a specific situation and are unsure about what to do, please discuss it with your manager or supervisor or the Compliance officer. They will provide further guidance and clarification.

### Additional Guidelines

The guidelines in this mechanism should be read in conjunction with:

- Employee Code of Conduct
- Whistleblower Policy
- Anti-Bribery and Anti-Corruption Policy
- Any additional documents that Cloudphysician deems necessary

### 3. Grievance Procedure and Time Frame

#### Grievance Types

Cloudphysician encourages employees to resolve minor disputes with the help of a manager and the HR department. If the informal complaint is not fairly and constructively resolved within 7 days, employees may file a formal grievance using the procedure outlined below.

Employees can file grievances when:

- Their health and safety have been compromised
- There are unjust changes made to the employment agreement
- Policy guidelines are violated
- Dispute between suppliers and/or management

All grievances pertaining to gender-based harassment/violence should be raised using the POSH policy.

All grievances should be communicated to the Compliance Officer in writing describing in detail the specific facts. Anyone can submit their grievance through one of the following channels:

- Sending an e-mail to [grievance@cloudphysician.net](mailto:grievance@cloudphysician.net) or
- Sending a physical letter to the following address:

The Compliance Officer  
Cloudphysician Healthcare Pvt Ltd  
7 Bellary Road, Ganganagar  
Bangalore, Karnataka, India - 560 032

#### Procedure

Cloudphysician will complete the following steps to handle grievances:

**Step 1: Acknowledgement:** The Compliance Officer will contact you to acknowledge the issue raised (unless your inquiry was anonymous) and the receipt of a written or oral complaint in 07 business days.

**Step 2: Investigation:** The Compliance Officer will initiate an investigation into your grievance, and as part of this process, we may need to get in touch with you for further information or updates.

**Step 3: Resolution:** Once Cloudphysician completes the investigation of your grievance, the Compliance Officer will contact you in 20 business days with our findings and our proposed response. If you are not satisfied with our response, the Compliance Officer will have further discussions with you to see if there are other possible steps that can be taken to resolve the grievance.

#### **4. Grievance Redressal Committee**

A Grievance Redressal Committee will be appointed by the Board of Directors of Cloudphysician for the purposes of this mechanism. The grievance redressal committee plays a crucial role in addressing and resolving issues or complaints.

#### **5. Communication and Training**

The Grievance Mechanism will be communicated to all employees and stakeholders on a regular basis. It will also be disclosed through Cloudphysician's website/intranet as applicable. Training will be provided to relevant team members, at regular intervals, to ensure grievances are documented, investigated and resolved.

#### **6. Documentation/Maintaining Records**

Accurate and complete record-keeping is essential to the successful operation of Cloudphysician, as well as to our ability to meet our legal and regulatory obligations. All documents generated in compliance with this mechanism will be retained as per statutory requirements and/or internal requirements of Cloudphysician.

In addition, Cloudphysician will document all grievances in a grievance database to analyze trends.

The database will have the following information:

- Grievance Number
- Name and contact details of the stakeholder
- Stakeholder group
- Location
- Date of grievance
- Type of grievance
- Brief description of the grievance
- Responsible Owner
- Name of the person who acknowledged
- Date the grievance is acknowledged
- Date of resolution/rejection
- Resolution status - Accepted/Rejected
- Proposed resolution/Reason for rejection
- Further actions to close the grievance
- Date of further action
- Final resolution date

## **7. Confidentiality and Anonymity**

If an individual would like their inquiry to remain confidential, the Compliance Officer will ensure that their name and contact details are not disclosed without their consent and that only the team directly working on the investigation of the case will have access to such information. If it is not possible to fully investigate or resolve the problem without revealing the individual's identity or the contents of the inquiry, the Compliance Officer directly working on the grievance will have prior discussions with the individual on how they would prefer to proceed.

If an individual would like to lodge an inquiry anonymously, it should be indicated in the grievance. The subject of your inquiry will be examined, however, it may be challenging for Cloudphysician to conduct the investigation and Cloudphysician will be unable to give feedback on the result of our examination of the issue that was raised.

## **8. Monitoring and Reporting**

- An Internal Audit will be carried out on a half-yearly basis to assess the performance of Cloudphysician's grievance mechanism in coordination with the Grievance Redressal Committee, where applicable. The assessment will cover the following components:
  - Implementation of the grievance mechanism in the businesses
  - Capacity/effectiveness of this mechanism including resourcing, training and capacity building, documentation, and update
- Cloudphysician will implement suitable performance measures and reporting systems to monitor metrics and develop relevant policies, procedures, and controls.
- All material findings and actions taken will be reported to the Board on a quarterly basis.
- Cloudphysician will report information/breaches to relevant stakeholders as per formats/frequencies requested.

## **9. Roles and Responsibilities**

### Board of Directors

- The Board of Directors of Cloudphysician shall have oversight of this mechanism and will review trends/effectiveness on an annual basis

### Grievance Redress Committee

- Setting up a formal process for submitting complaints, ensuring confidentiality, and providing multiple channels for employees to raise their concerns.
- Conducting a thorough investigation to understand the details of the grievances
- Making recommendations for resolving the grievance. This could include suggesting corrective actions, providing counseling, or recommending disciplinary measures if necessary.
- Communicating the outcomes of the grievance process to the parties involved.
- Recommending changes to policies, procedures, or organizational practices to prevent similar issues in the future.

- Organizing training sessions or awareness programs to educate employees about the grievance redressal process, their rights, and the importance of resolving conflicts in a constructive manner.
- Reviewing and updating grievance redressal policies and procedures to ensure they remain effective and align with legal requirements.

#### Compliance Officer

- Work collaboratively with the Grievance Redressal Committee to establish an effective grievance redressal mechanism within the organization
- Ensures that any grievances raised are addressed promptly and resolved in a timely manner by Cloudphysician
- Regularly provides a comprehensive report on the periodic reviews of the grievance redressal mechanism and the grievances
- Supports the Grievance Redressal Committee in resolving grievances, following the instructions issued by the Committee

#### Employees/Third parties

- Familiarise themselves with this mechanism and any related policies, procedures and controls through participation in training sessions in the required timeframe
- Provide full cooperation for any inquiry or investigation conducted by Cloudphysician regarding grievances

### **10. Amendment/Update**

The Board of Directors will review the implementation of this mechanism on an annual basis, considering its suitability, adequacy and effectiveness. If revisions are deemed necessary, the updated document will be presented to the Board of Directors for approval before implementation.

The updates to the mechanism will be carried out under either of the following circumstances:

- External changes such as national laws and regulations and investor requirements
- A need to update the procedures owing to internal requirements/learnings