

# Global Grievance Redressal Policy

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## Version Control

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## 1. Objective

The Grievance Redressal Policy (“**the Policy**”) aims to provide a mechanism for all employees and other stakeholders of Firstsource Solutions Limited and its subsidiaries (“Firstsource” or “**the Company**”) to raise a grievance, with an assurance that the grievance raised is dealt with objectively, fairly, and in a timely manner.

## 2. Scope

This Policy applies to all the employees, communities, investors, shareholders, clients, vendors, and value chain partners of Firstsource Solutions Limited and its subsidiaries globally

## 3. Definitions

Sl. No.	Defined Term	Definition
1	Applicable Law(s)	All applicable laws in all countries where Firstsource has its presence and/ or is conducting business.
2	Client	The entity to whom Firstsource provides goods and/or services.
3	Stakeholder	Employees, communities, investors, shareholders, clients, vendors, and value chain partners of Firstsource Solutions Limited and its subsidiaries.
4	Misleading Advertisements	An advertisement in any form of mass media (including but not limited to print media, commercials, websites, social media) which is misleading, has false or deceptive information, if information has been concealed or left out, and also covers all kinds of false claims made to customers by the seller of goods and/ or services.
5	Restrictive Trade Practices	A trade practice that prevents, distorts or restricts competition and includes practices that tend to obstruct the flow of capital or resources into the stream of production and agreements between parties that are not considered to be in public interest.
6	Unfair Trade Practices	Any fraudulent, dishonest trade practice or business practice which is prohibited by statute. The practices include without limitation, the use of various deceptive, fraudulent, or unethical methods to obtain business, gain an advantage, or turn a profit by misrepresentation, false advertising or misrepresentation of goods and/ or services, deceptive pricing, non-compliance with Applicable Laws and all engaging in trade practices which are not considered to be in public interest.
7	Vendor/s	All individual proprietary concerns, companies, firms, non-profit organizations, agents and representatives with whom Firstsource has a contractual relationship for procurement of goods and/ or services either for itself or for provision of services to its customers / Clients
8	Complainant	A person who makes a complaint under the scope of this Policy

## 4. Definition of Grievance

Grievances are concerns, problems, or complaints raised by either an employee or any other stakeholders. It may include concerns about their work conditions, health and safety at the workplace, harassment, pay and benefits, misleading advertisements and information, delivery of essential services, unfair and restrictive trade practices, recovery of dues, lack of equal opportunity or any other issues. The above-mentioned examples of complaints or concerns are indicative and not exhaustive.

Whistleblowing, complaints regarding sexual harassment, ethics, bribery, gifts, and entertainment will be dealt with as per the respective policy guidelines of Firstsource.

## 5. Approaches to Grievance Redressal

### 5.1 Employees

The employees can choose to share their grievance by approaching their immediate supervisor or the POC/department concerned. If the complaint is against the reporting manager or if the employee does not wish to discuss the concerns with the reporting manager, they may seek advice from the Human Resource Department (“HR”) on the way forward with the complaint. The employee can also raise the grievance through the Grievance Redressal System application (“FirstConnect”) at <https://firstconnect.firstsource.com/firstConnect/GRSLogin.aspx> or by writing to [grs@firstsource.com](mailto:grs@firstsource.com).

Depending on the category of grievance, the complaint is directed to the respective department for resolution. A ticket is auto assigned, and the employee receives communication at every step of the process. There are two levels of escalation matrix built in the system and if the employee is not satisfied with the resolution provided, they can further appeal through the grievance redressal system.

### 5.2 Other Stakeholders

All our stakeholders, including employees, ex-employees, communities, investors, shareholders, clients, vendors, value chain partners, have the option of writing to [grs@firstsource.com](mailto:grs@firstsource.com) in case of any grievance. They can also submit a grievance via our website link <https://www.firstsource.com/contact/>

Depending on the category of grievance, there is an ownership matrix defined for the various stakeholder groups in the system. On receipt of the grievance, the convener forwards it to the specified point of contact for Redressal to ensure closure of the grievance

## 6. Investigation Process

Firstsource will ensure that grievances are addressed in accordance with applicable laws and Firstsource policies. The complaint received on grs email ID will receive an acknowledgement within 2 working days as per the process.

The GRS Convener is responsible for following up with the department concerned regarding the progress and closure of the complaint. In case of delays, the Convener will follow an internal escalation matrix to ensure a timely resolution. All cases will be tracked for closure and reported by the convener.

## 6.1 Grievance Registered on FirstConnect

- Once a grievance is raised on FirstConnect, an automatic notification will be sent via email to the designated grievance resolution owner.
- Every grievance resolution system owner is required to acknowledge grievance within 2 working days and resolve it within 3 working days. If the grievance is complex, an extension of the TAT can be requested, subject to the manager's approval.
- The grievance resolution owner can reassign the grievance to another department or team member within 2 working days if the action required falls under their responsibility. The TAT for the reassigned grievance will follow the same timeline.
- Notifications regarding grievance registration, resolution, and reopening will be sent to both the complainant and the grievance resolution owner's official email address. If the complainant disagrees with the resolution, they can reopen the grievance. The procedure for reopening will follow the same steps outlined above.

**Note** - Please note that the process for registering grievances on *FirstConnect* is not applicable in UK, due to specific legislative requirements. Employees based in UK are required to follow the provisions outlined in the *UK Grievance Policy* for raising and resolving grievances.

## 6.2 Grievance Registered on GRS email ID or on website

- The complainant must raise the grievance by the website link <https://www.firstsource.com/contact/> or emailing the designated GRS email ID: [grs@firstsource.com](mailto:grs@firstsource.com)
- Upon receipt of the grievance, an acknowledgement of receipt of the mail is sent to the complainant. The GRS Convener acknowledges grievance and involve the relevant department to address the issue within 2 working days.
- The grievance must be resolved within 30 days from the date it is received. If needed, the TAT may be extended based on the complexity of the case, subject to consensus from the GRS Convener.
- The grievance will be considered closed when the findings of the investigation are addressed and communicated to the complainant.
- The GRS Convener will maintain a tracker that includes the grievance allocation timeline, resolution owner, real-time TAT, grievance summary, resolution details, and the reason for any delay in case closure.

## 7. Confidentiality & non-retaliation

Firstsource is committed to ensuring that no one suffers from detrimental treatment for reporting a grievance. The complainant can report concerns in confidence and without fear of retribution.

Appropriate action will be taken against individuals proven to be involved in any attempted retribution. The complainant can choose to be anonymous, and their identity shall not be disclosed by Firstsource, except to those people who are directly involved in the investigation concerning the grievance. All information related to a grievance will be handled discreetly and shared strictly on a need-to-know basis to ensure confidentiality throughout the process.

## 8. Appeal

If the complainant is of the opinion that their grievance has not been satisfactorily addressed by Firstsource within a reasonable time, they can write to [whistleblowing@firstsource.com](mailto:whistleblowing@firstsource.com)

### 8.1 Option to file a complaint with MOHRE (UAE Employees)

If the grievance cannot be resolved internally, or involves legal/contractual issues, or involves serious violations of labour rights, employees have the right to file a complaint with the Ministry of Human Resources & Emiratization (MOHRE) via: MOHRE website, MOHRE mobile app, MOHRE call centre: 600590000 or Tasheel/Twjeeh service centres.

**Note: this step should be taken only after exhausting internal grievance mechanisms, unless the matter is urgent or critical.**

## 9. Reporting and Transparency

Firstsource reports its grievances through various annual reports as part of disclosures.

## 10. Review

This policy will be reviewed annually or as required to ensure compliance with legal and business requirements.