



Grievance Redressal Mechanism (GRM)

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1. INTROCUCTION

Grievance redress mechanism is an integral part of stakeholder engagement process. The implementation of a project may have implications on both the environment as well as the people around the project site. People may have apprehension about the impacts of the project during the construction and operational phase. **Radiance Renewables** (herein after referred as 'Radiance') and the fund managers seek to build strong relationships with stakeholders and manage the impact of its business activities on affected communities.

A Grievance redress mechanism allows stakeholders to reach out to **Radiance** and raise their questions or concerns in a fair environment free from fear and prejudice while helping **Radiance** in impartial and prompt disposal of such grievances. **Radiance** aims to address all complaints received, regardless of whether they stem from real or perceived issues. Any stakeholder who considers himself/herself affected by activities of projects owned and operated by **Radiance** will have access to this procedure. The statutory rights of the complainant to undertake legal proceedings remain unaffected by participation in this process and the GRM shall be transparent, easily accessible, considerate of gender and cultural diversity and capable of encompassing the risks associated with all stages of the project that may have an impact on the people and surrounding environment. Radiance seeks to foster trust in the process and its outcomes. To this end, **Radiance** will communicate this procedure in an understandable manner to all concerned stakeholder groups. Confidentiality will be respected, and Radiance will take all reasonable steps to protect the interest of parties.

2. PURPOSE

GRM establishes the process for addressing complaints raised in connection with activities of projects owned or operated by **Radiance**. It describes the scope and procedural steps for the complaint handling and specifies roles and responsibilities of the parties involved. The purpose this mechanism is to respond to project requirements better by establishing it earlier in the project cycle as a measure to pre-empt rather than to react after escalation of conflicts/issues/disagreements. This GRM also aligns the grievance management practices followed at the level of the portfolio company and the project level with the requirements laid down in the APPENDIX L of Environmental Social Governance Management System (ESGMS) of Green Growth Equity Fund (GGEF) Ver 2.0, dated 25 October 2020.

The purpose of GRM is also to address local public grievances regarding environmental impacts during construction and operation phases of the project. GRM will also help receive and facilitate the resolution of concerns and grievances of affected people about physical and economic displacement and other project impacts, including impacts on the vulnerable groups.

It will be revised and updated periodically based on experience and feedback from stakeholders.

3. OBJECTIVES

This Procedure has the following objectives:

- Establish a prompt, consistent and transparent mechanism for receiving, investigating and responding to complaints from stakeholders.
- Ensure proper documentation of complaints and any corrective actions taken.
- Identify and manage stakeholder concerns and thus support effective risk management; and
- Contribute to continuous improvement in performance through feedback and lessons

Learned.

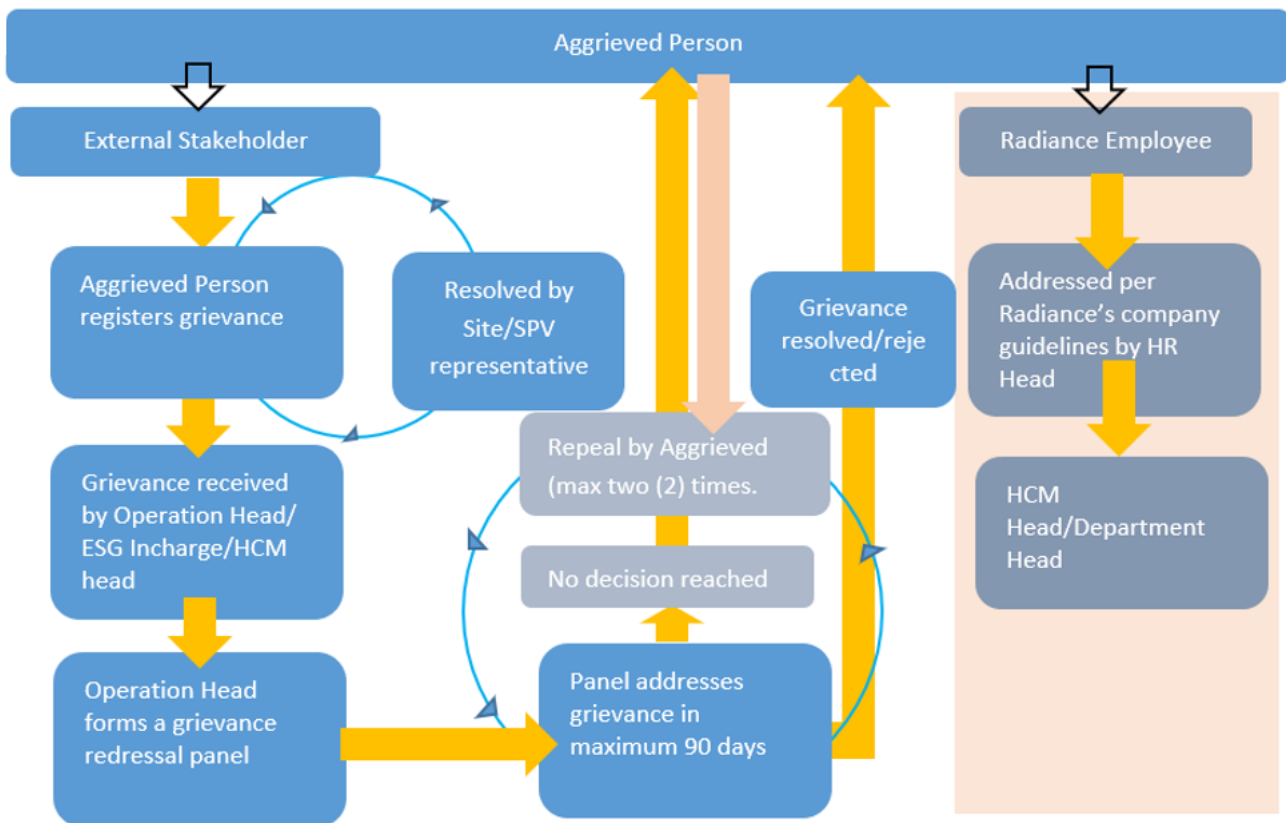
- To have a multi-level process for addressing grievances from project-affected communities.

4. GRIEVANCE RECEIPT AND ACKNOWLEDGEMENT

- Radiance, at the corporate level maintains a feedback/concern mail id **xxxxxxx** on its website for registering any feedbacks/ grievances by external stakeholders. Mails to this id is responded and recorded. Emails submitted to the email address is kept confidential
- Manned Site to maintain a complaint/suggestion box for workers and a community grievance record register (Appendix B)
- Unmanned Site to maintain a complaint/suggestion (with email ID written on it) box for all stakeholders.
- Upon receipt of any grievance/concerns from external stakeholder, same shall be submitted to the responsible person, where confidentiality shall be maintained to the extent possible.
- The HCM Head will have the accountability for maintaining records of all the grievances along with the reference number.
- The receipt of the grievance should be acknowledged to the complainant with reference number and estimated timeline for investigation.
- **Employees of Radiance can reach out directly to HCM Head or their Department Head to register their grievances.**

5. INVESTIGATING AND ADDRESSAL OF GRIEVANCES

- The site/SPV representative registering the grievance shall assess the legitimacy of the grievance and try to absolve the grievance at hand or immediately in case feasible. Grievances that require escalation would be escalated to either Operations Head, ESG Incharge, HCM Head.
- The site representative shall document all complaints received, the actions taken on each of them and send a report of the same to the Operations Head and ESG Incharge on a regular basis.
- In case it is adjudged that the grievance addressal requires participation of additional company representatives, the Operations Head will form a grievance redressal panel, and a meeting of the panel members would be convened at appropriate time with or without the participation of the aggrieved person as deemed necessary by the panel. The grievance would be mutually discussed, and action agreed by panel members.
- The grievance panel shall comprise of but not limited to the Head of ESG (at Eversource), Operations Head, HCM Head, ESG Incharge, Site-Manager/Site Incharge level and any independent member if relevant, among others.
- The panel shall resolve the grievance /complaint received before 90 days or as agreed in business agreement with authorities. In cases where additional time is required to resolve, the same may be noted in the grievance database (providing reason for delay) and practical/implementable timelines should be fixed.
- The decision taken by Panel members would be forwarded to Executive Director (ED) for further approval. Once approval from ED is received, the decision would be communicated to the aggrieved accordingly.
- In case no decision is reached, the same shall also be communicated back to the aggrieved person. The aggrieved person/party may approach and may repeat with the company for a maximum of two (2) more times.
- In case the grievance is still not resolved, the aggrieved person is free to register the grievance with statutory authorities having necessary power and authority to resolve the grievance.
- In case a feedback/concern/ grievance is received at the fund level, Head of ESG at Fund level (Eversource), the Head of Operations, Head of legal and compliance shall analyse the issue and sees the legitimacy of it and accordingly assigns it to concerned person.



- Records of all grievances, including those resolved at site level shall be informed to the Operations Head, ESG Incharge and a database having the following minimum information shall be maintained at the portfolio level by the HR Department for all grievances received, their subject and status of closure along with the reference number. A summary of all feedback/concern/ grievance shall be maintained at fund level by the Head of ESG (at Eversource):
 - i. date of grievance
 - ii. name of aggrieved party and any affiliation/organization
 - iii. contact details of aggrieved party
 - iv. category of grievance (environmental, social, governance, others)
 - v. whether the grievance is directed at fund level or an investee (if investee, its name should be listed)
 - vi. summary of the issue
 - vii. whether the grievance is an appeal to an earlier grievance management outcome
 - viii. relevant parties to engage at Fund level and any applicable investee of GGEF
 - ix. recommended investigation of issue
 - x. outcome of investigation and actions taken
 - xi. date of closure and information provided to aggrieved party
- It will be the responsibility of the Head of ESG (at Eversource) to ensure that:
 - i. Any grievance which is found to be legitimate, a response would be provided to the aggrieved party for information about next steps with a timeline or directly with the resolution.
 - ii. Discussions and effort is initiated at fund level and/or investee level to evaluate the grievance and determine if any action should be taken to rectify the root cause.
 - iii. Investigations into grievances can vary depending on the nature of the grievance, but best efforts are made to ensure that grievances are handled promptly. Most

- investigations should not last more than 90 days subject to promptness on the aggrieved party's response to any queries from the Fund's side.
- iv. Aggrieved party is appropriately engaged if required either through writing, conference call and/ or meeting during investigation and any such engagement with an aggrieved party be noted in the grievance log.
 - v. Aggrieved party is informed of outcomes of the investigation and any action being taken or reasons for not acting.
 - vi. The investigation outcomes are recorded in the grievance log, including a summary of actions taken or rationale for not acting and the date of response to the aggrieved party.
 - vii. The contents of the grievance log and its management are maintained with confidentiality of the aggrieved party where relevant, and there is no unfair practice like retaliation, threat or intimidation against aggrieved parties or whistle-blowers.

APPENDIX A GRIEVANCE REGISTRATION FORM

GRIEVANCE REGISTRATION		
Grievance No.:		Date:
Name:		Father's/Spouse's Name:
Village/Taluka/District:		Gram Parishad/Panchayat:
Phone no.		
Category of grievance: <input type="checkbox"/> Major <input type="checkbox"/> Minor <input type="checkbox"/> Feedback <input type="checkbox"/> Internal Grievance <input type="checkbox"/> External Grievance		
Whether the grievance is an appeal to an earlier grievance management outcome?	<input type="checkbox"/> Yes <input type="checkbox"/> No	If Yes, provide grievance no. of the earlier grievance
Summary		
Name of person recording grievances:		
Designation of recording person:		
Proposed date of response to grievance:		
Signature of recording person		Signature of complainant
ACKNOWLEDGEMENT RECIEPT		

GRIEVANCE REGISTRATION		
Grievance No.:	Date:	
This receipt is acknowledgement of grievance registration by _____ _____, resident of village _____ on date _____. His case number is _____ and the date for response is _____.		
Name of the person recording grievances:		
Designation of the recording person:		
GRIEVANCE REDRESSAL RESPONSE		
Date of redresses:		
Decision of person disposing the grievance (give full details):		
Claimant accepts the outcome:	Accepted <input type="checkbox"/>	Not accepted <input type="checkbox"/>
Signature of claimant		
Signature of Operation Head	Signature of ESG Head	
Note:		
Please note, if at any time the grievant is unsatisfied with the resolution of the grievance, they may choose to ask for an escalation to the next level or may resort to legal redress.		

APPENDIX B GRIEVANCE RECORD REGISTER

S. No	Date	Village	Topic of grievance	Summary of grievance	Stakeholder Group	Acknowledgement date	First response date	Follow-up (if applicable) ID	Unique Grievance ID	Status
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