

Title: Grievance Redressal Policy	No.: LPVer1.7
Applicability: All Permanent Associates of Legato Healthcare Technologies LLP	Original Effective Date: 02 -August-18
Approver(s): Subhashini Sriram - Head HR, Legato	Last Review/Approval Date: 11-December-19
Process Owner: Kameshwari Danturti - Sr Manager - HR, Legato	Current Version Effective Date: 5-May-2021

Version History

Change History	Review or Approved Date	Effective Date	Description of Changes
1	02-Aug-18	02-August-18	Added a paragraph on Malicious or false complaint
2	23-Apr-19	01-May-19	Revised List of Committee Members
3	21-Jun-19	21-June-19	Revised List of Committee Members
4	15-Jul-19	15-July-19	Revised List of Committee Members
5	30-Jul-19	01-August-19	Added a clause of composition of Apex Committee
6	21-Nov-19	21-Nov-19	Revised List of Committee Members
7	11-Dec-19	11-Dec-19	Revised List of Committee Members
8	5-May-21	5-May-21	Deletion of Apex and addition of AR office and process flow diagram

Purpose

The purpose of this policy is to:

- Describe the scope and definition of grievances
- Outline the process of reporting grievances
- Share general guidelines to follow with an aim to provide a robust grievance redressal system and provide a harmonious and productive environment.

Scope

This policy is applicable to all fulltime associates of Legato Health Technologies LLP.

Policy

The policy aims to fulfil the following objectives:

1. To enable all the associates to share or express their concerns
2. To set up a process on resolution of grievances in an impartial and fair manner.
3. To address concerns within a reasonable time frame.

Definitions

We are aware that there may be times when our associates see a need to file a complaint against unjust treatment, harassment, etc. which impacts their regular work in the workplace.

This grievance policy is created to clearly outline the process for these instances to ensure that all our associates are heard with **complete confidentiality**, and their concerns addressed.

The process is known as Grievance Redressal.

Examples for Grievances

Below is a sample list of such grievances that can be considered as appropriate under this policy, but are not limited to: -

- A belief that companies policies, practices, rules, regulations, or procedures have been applied inconsistently
- Treatment considered unfair, such as coercion, reprisal, harassment (including sexual harassment), or intimidations;
- Alleged discrimination because of unconscious bias, discrimination on the grounds of age, color, ethnicity, disability (including persons infected with HIV or persons with AIDS), marital status, nationality, region, race, religion, gender, sexual orientation, pregnancy, medical condition, national origin, race, gender identity etc. and
- Improper or unfair administration of associate benefits or conditions of employment such as scheduling, vacations, fringe benefits, promotions, retirement, holidays, performance review, salary, or seniority.

Associate Relations Office:

Associate Relations Office (AR Office) is an independent function within HR which reviews workplace concerns raised by associates in an unbiased manner and provides counsel/advice to all stakeholders appropriately. The AR office operates on the principles of trust and fairness where associates can raise concerns with confidence and be assured that these will be treated and resolved with utmost confidentiality and fairness.

If you have a concern or question, you should follow the process below:

- First discuss it with those in your management chain.
- If you are not comfortable with that approach for any reason, or if you believe that no action is taken, you may submit a service request through Engage tool on Pulse page
- Your request comes directly to the AR office and will be completely confidential.
- Incidents relating to POSH (alleged discrimination or discriminatory harassment based on race, color, religion, sex, gender, age, national origin, sexual orientation, disability, or any other protected characteristic) should immediately be reported through the Engage tool choosing POSH as the option while submitting the grievance. Such complaints may be raised through the grievance redressal process, however they will be addressed by the POSH team.

You may raise concerns, in good faith, to AR without fear of retaliation. All the concerns raised with AR team will be kept completely confidential. Legato strictly prohibits any acts of retaliation against associates who raise good faith concerns, or who participate in investigations of concerns.

However, associates who knowingly make false or malicious reports against another associate will be subject to corrective action up to and including termination of employment (as consistent with applicable law).

If conduct in violation of this policy resumes, or if the associate feels that he or she has been retaliated against for raising a concern, the associate should immediately notify AR.

General Guidelines

Associate Relations (AR) as a part of the Human Resources department and can help resolve issues related to these and other incidents:

- Perceived conflicts with managers or associates including unfair treatment and /or favoritism
- Improper administration of a policy or an associate benefit
- Problems arising from the application of policies, practices or rules, department work rules or from any condition of employment
- Unsafe or unhealthy working conditions
- Corrective action /PIP concerns
- Incidents of alleged discrimination or discriminatory harassment based on race, color, religion, sex, gender, age, national origin, sexual orientation, disability, or any other protected characteristic. All such incidents should immediately be reported through the tool choosing POSH as option. While such complaints may be raised through the grievance redressal process, POSH team will handle such cases. AR will maintain confidentiality to the extent permissible by law.
- Information concerning an associate grievance will be confidential. AR team will investigate the complaint and may discuss it only with those individuals on a "need to know" basis or those who are required to supply necessary background information or advice.
- Associates will not be penalized for proper use of the grievance redressal process. However, if an associate raises complaint in bad faith or solely for the purpose of delay, or harassment, or repeatedly raises disputes devoid of merit or in connection with minor disagreements, it will be considered an improper use of the AR office services.
- Initiation of a complaint under the grievance resolution policy by an associate does not limit the right of the company to proceed with any disciplinary action that is not in retaliation to the use of the grievance redressal policy.
- In addition, associates and managers are prohibited from retaliating against an associate who properly uses the grievance resolution procedure.
- The company may, at its own discretion, refuse to proceed with any grievances if it determines improper under this policy.
- Disputes with respect to the terms of employment stated in the employment letter shall be addressed by the grievance resolution procedure. If any such grievances are raised, the conditions of employment as per the employment agreement take precedence over the grievance resolution procedure.

Grievance Resolution Procedure

A healthy & robust grievance redressal process helps to create mutual respect between the organization & its associates. It facilitates and maintains a positive employee morale through quick resolution of the

grievances. As an organization we strive to correct and address grievances in an open and transparent manner.

- An appropriate dispute is defined as where an associate has expressed dissatisfaction concerning any interpretation or application of a work-related policy by management, supervisors, or other associate.
- Associates are encouraged to first approach their manager to discuss and try to resolve any issues they might be experiencing. This often addresses a concern in a simple, open and time- efficient manner.
- Manager shall respond to the associate within 5 working days
- If there is no response from the manager or the associate is dissatisfied with the response by the manager, associate should report the same to the (Associate Relations) AR office through the Engage tool on Pulse portal to address their grievances.
- The AR office will ask all involved parties as needed to share the details of their supporting statements where appropriate. All witness shared will be interviewed and all the interviewed statements would be recorded, signed and dated if the meeting is conducted in person. Alternately the meetings may be recorded or documented over emails during virtual/remote working.
- Post enquiry, the AR team will review the findings and decide on the final recommended action basis the findings.
- The AR team will meet the respondent and walk him/her through the nature of allegations, the details of findings and inform them of the final decision.
- AR team will also meet/talk to other parties (including HR) involved where there is an action recommendation. All such involved parties should update AR office on the closure of actions.

Improper use of Grievance Redressal forum through malicious or false complaint

You may raise concerns, in good faith, to the Associate Relations (AR) office without fear of retaliation. All the concerns raised with AR team will be kept completely confidential. Legato strictly prohibits any acts of retaliation against associates who raise good faith concerns, or who participate in investigations of concerns.

However, associates who knowingly make false or malicious reports against another associate will be subject to corrective action up to and including termination.

If during investigation, the AR office determines the following, it is deemed to be inappropriate conduct/misconduct in terms of Company policy.

- The allegation was malicious
- The complainant has made the complaint knowing it to be false
- The complainant has produced any forged or misleading document
- Any witness has given false evidence or produced any forged document

Action against malicious or false complainants

The AR office will recommend that action be taken against the complainant in accordance with the prescribed policies. It is clarified that a mere inability to substantiate a complaint or provide adequate proof will not attract action against a complainant under this provision.

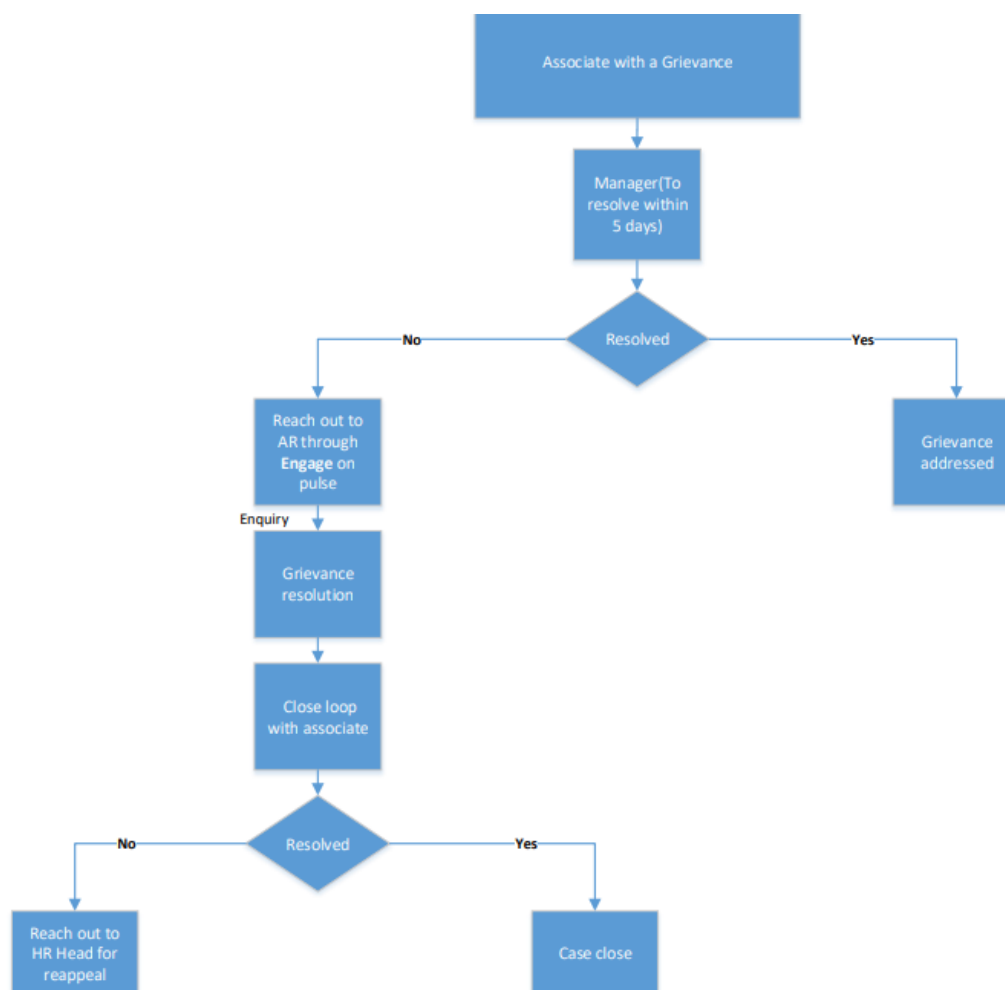
Action against false witnesses

Where the AR office arrives at a conclusion during the inquiry any witness has given false evidence or produced any forged document, it may recommend necessary action against such witness

Appeal

In case an associate is not satisfied with the outcome of the AR office, he or she can appeal to the HR Head – Legato India. The HR Head will take the necessary steps to review and investigate the grievance and will then issue a final written decision.

Redressal flow chart:



FAQ for all associates

1. What does AR mean?

AR (Associate Relations) is one of the functions in HR, the team focuses on encouraging healthy relationships, transparent and meaningful conversations and want all associates and managers to feel valued and supported

2. Why should I use engage tool to share my grievance when I can connect with HR over mail?

With Legato growing in such a fast pace environment, it is important to streamline our processes to ensure better redressal of grievances. Connecting within teams using a standardized tool and a specialized office for all associate relations requirements ensures faster and more transparent redressal.

3. What is the benefit of using the tool?

Service Now has a well-defined workflow with SLA (service level agreements) for each catalog and task. You will get regular updates on your case, thereby facilitating a transparent communication. The tool also provides various reporting functionality.

4. Where can I get the link to access the AR tool?

The link to AR tool is '<https://anthem.service-now.com/esc>'

Alternatively, you can visit the Pulse page under HR and add app 'IND- Legato AR'

5. What are the different service catalogs available in the tool for my support?

- Coaching for me
- Help resolving a conflict
- Help me with a workplace concern

6. Can I get the status on the case submitted by me?

You can view the case submitted under the section "My Cases". You can also check the status of the cases and the AR member assigned to your case.

7. Can I cancel the request once submitted?

Yes, if you want to cancel the request once submitted, by clicking on the section "My Cases".

8. How can I request help from AR, if I have an urgent issue?

All cases are actioned at the earliest, however If you have an urgent issue, please include the word URGENT in the short description.

9. What are the various types of grievances for which I can approach the AR team?

Below are a few categories of grievances for which you can approach the AR team. However, we would recommend you talk to your manager on the grievance first before approaching AR team.

- Not satisfied with current job role/ process/ technology
- Need guidance on managing a difficult situation/ team member/ manager

- Personal situation impacting work
- Work related challenges
- Guidance on career aspirations/ learning options
- Assistance in Organization policy
- Dealing with Inter team conflicts
- Guidance of soft skill coaching aspects
- Conflict with team member working in the same team/project
- Conflict with Reporting Supervisor / Manager /Skip manager
- Conflict with stakeholder/ trainer/ buddy /colleague and if there is any need of coaching assistance such as counseling, guidance etc.
- Harassment/ discrimination/ biasness/ favoritism/ violence/ abuse
- Issues with benefits provided by the company (Insurance, Joining Bonus, EAP etc)
- Instance of retaliation
- Impact due to Organization Communication/ Restructure (Redeployment, business process revamp)
- *Complaint on observed misbehavior of an associate (FTE) with vendor staff
- Organization policies or process

10. What are SLAs for closing my grievance?

Every service catalog has an SLA by which every case has to be closed below are the details

- Coaching for me - 15 business days
- Help resolving a conflict- 15 business days
- Help me with a workplace concern - 15 business days

11. Can I raise an employment concern on behalf of someone else?

Yes, you can if you witness any wrongdoing/misconduct/inappropriate behavior which impacts any other FTE (full time employee) or vendor staff, please raise a concern in the tool

12. How is confidentiality maintained on my grievance, when reported?

Any request raised is kept confidential and discussed with other associates or stake holders on a need-to-know basis as part of the enquiry process.

13. Am I eligible to raise a grievance while serving notice period?

Yes, you can raise a grievance with AR as long as you are employed with us.

14. Can I raise service ticket for the same issue again if it persists in future?

Yes, you can raise the service ticket on engage tool for the same issue.

15. Whom should I reach out to if I am not happy with resolution provided by AR team?

In case, you are not happy with the resolution, you can reach out to the Head HR – India.

16. Can I raise multiple issues at the same time or separately?

Yes, you can raise multiple issues at the same time, if the nature of grievances are separate.

17. Can a contract employee raise a concern against an FTE?

Yes, a contract employee can raise a concern against a FTE. However, since they do not have access to Engage tool, we would recommend they raise it with their employer who will work with us for resolution.

18. As a FTE, can I raise a concern against a contract employee when I have a grievance?

Yes, an FTE can raise a concern against a contract employee.

19. How can a contract employee raise a concern against another contract employee?

Both of them should reach out to their parent organizations to get their concern addressed.

20. Can my issue / concern be resolved without raising service ticket on engage tool?

It is advisable to raise a service ticket on engage tool as it will help you in tracking the status of the issue.

21. Do I need to inform my manager before reaching out to AR office?

No, it is not required to inform your manager before reaching out to AR office.

22. Will my identity be confidential for the concern / issue I raise with AR?

Yes, we will resolve your issue with confidentiality and your identity will not be disclosed until there arises a situation on a need-to-know basis.

23. Will my manager come to know if I raise a concern / issue against them?

No one except the complainant and AR team members will be aware of the ticket you raised with AR office. You can stay assured on the confidentiality to that extent.

24. Will my performance ratings or my experience at legato be impacted if raise a concern / issue with AR?

No, it won't affect your employment or career growth in any form.

25. Do we have help line number for AR office?

We don't have any help line number. But once the ticket is raised, we make sure to establish an initial contact within 48hrs.

26. Can I withdraw my concern / issue during investigation?

Yes, you can withdraw. However, we would advise you not to, as the primary goal of AR office primary is to make sure you get appropriate redressal to your concern.

27. Can I raise more than 2 concerns / issues at the same time?

Yes you can. Please select the appropriate category for the issues in the AR tool by raising two separate tickets if the categories are different.

28. Can my concern be addressed / resolved regardless of the TAT what AR follows?

One member from the AR team (AR consultant) will be dedicated to your issue, when raised and you can expect a timely resolution. We are sensitive to your concern and will help with a resolution at the shortest possible time.

29. Can I see an update on engage tool for the issues I have raised?

At regular intervals, AR consultant working on your concern will update the tool with progress and this will be visible to you as it gets updated.

30. Can I talk to AR team member before I raise a concern on tool to understand if my concern / issues fall under scope of AR?

You can speak to any member from AR team to discuss and understand the issue you have. If it does not come under the scope of AR, you will be routed to the right person/ department.

31. Can I reach out to AR for any 1*1 discussion for my personal wellbeing?

We will advise you to reach out to EAP and use their services as appropriate.

32. Will I get opportunity to justify myself and will I be heard out if someone raises a false complaint on me?

Yes, AR team believes in giving fair hearing to both the parties. If the complaint is malicious in any form, disciplinary actions will be taken against the complainant which may lead up to termination of employment ((as consistent with applicable law).

33. Can I reach out to AR directly if I am not comfortable speaking to my HRBP & manager?

Yes you can reach out for any particular issue you have for which you are not comfortable talking to your manager or HRBP.

34. Can we raise POSH related concern in AR tool?

Yes, you can choose POSH as a category and the case will be routed to POSH team. All sexual harassment cases can also be raised to POSH committee over email.

40. What action will AR team take if one of the witness / investigation committee part of investigation don't maintain confidentiality?

After due enquiry, appropriate disciplinary action will be recommended.

41. What will happen if the potential accused comes to know that the complainant has raised the issue against him/ her?

AR team members do not discuss on any concerns or grievances raised to ARO. However, we also expect the same level of confidentiality to be maintained by the complainant in not discussing with anyone else.