



FUTURE PERFECT

POLICY ON GRIEVANCE REDRESSAL

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	Policy on Grievance Redressal	DIM-BSM-TEM-24
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DISCLAIMER

This Grievance Redressal Policy outlines Dimexon’s approach to providing accessible, transparent and confidential channels for stakeholders to raise concerns and grievances related to Dimexon’s operations and business relationships. The Policy is intended to support fair review, appropriate escalation and timely resolution of grievances, in line with applicable laws, internal policies and internationally recognised principles for effective grievance mechanisms. For the purpose of this Policy, “applicable laws” refers to the laws of the jurisdiction applicable to the relevant Dimexon entity, location, and subject matter of the grievance.

While every effort is made to ensure the accuracy and currency of the information contained in this Policy, Dimexon reserves the right to modify, amend or update this Policy at any time to reflect changes in legal requirements, organisational practices, grievance handling procedures or stakeholder expectations.

Nothing in this Policy is intended to limit, restrict or override any statutory, regulatory, contractual or legal rights, remedies or obligations that may apply. The Policy does not create any additional contractual rights beyond those provided under applicable law or contract. The handling of any grievance will be subject to the facts and circumstances of the case, applicable law and relevant internal procedures.

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/1 INTRODUCTION

Dimexon is committed to maintaining a transparent, respectful and ethical working environment across all its operations and relationships globally. Recognising that concerns and grievances can nonetheless arise, all stakeholders should have the opportunity to raise an issue with any practice followed within the organisation. This Grievance Redressal Policy aligned with internationally recognised frameworks, including the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises establishes a structured and accessible mechanism through which such concerns may be raised, heard, investigated and resolved fairly.

This policy is publicly available on Dimexon's website.

/2 OBJECTIVES

- Promote an inclusive environment where all stakeholders have the opportunity to be heard through accessible, transparent and confidential grievance channels.
- Facilitate stakeholders to raise their concerns about work conditions or issues with any practice followed by the organization, with the concerned management team member(s).
- Ensure timely acknowledgement, investigation, remediation and corrective action where required.
- Ensure stakeholder satisfaction with the responsiveness and fairness of Dimexon's grievance process.
- Support continuous improvement by identifying systemic issues and trends from grievances received.
- Ensure the grievance mechanism is aligned with internationally recognised effectiveness criteria, including being legitimate, accessible, predictable, equitable, transparent, rights-compatible, and a source of continuous learning.

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/ 3 SCOPE & APPLICABILITY

This policy is applicable to all stakeholders involved with Dimexon across all locations globally

/ 3.1 INTERNAL STAKEHOLDERS

- All current employees of Dimexon, inclusive of members of management, across all locations.
- Members of the Board of Directors.
- Contract and temporary workers engaged at any Dimexon site.

/ 3.2 EXTERNAL STAKEHOLDERS

This policy is applicable to all stakeholders involved with Dimexon across all locations globally

- Suppliers, vendors and business partners.
- Customers and buyers.
- Community members and representatives impacted by Dimexon's operations.
- Non-governmental organisations (NGOs) and civil society groups.
- Any other individual or group with a substantive concern related to Dimexon's operations.

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/ 3.3 MATTERS COVERED BY THIS POLICY

The list is not exhaustive:

- Any form of workplace harassment, discrimination, or unfair treatment.
- Health, safety, and wellbeing concerns, including unsafe working conditions or practices.
- Concerns regarding management practices, including inequitable treatment, or abuse of authority, including actions to suppress reporting or prevent escalation.
- Concerns relating to violations of fundamental human rights, including denial of safe and dignified working conditions.
- Non-compliance with internal policies or applicable labour and employment laws, where it impacts employees or stakeholders.
- Conduct or practices that may materially and adversely impact the reputation or financial position of Dimexon.

/ 3.4 MATTERS NOT COVERED BY THIS POLICY

The following matters are governed by separate internal procedures and should normally be directed to the relevant process:

- Annual performance appraisal outcomes.
- Grievances arising out of, or directly pertaining to, disciplinary action or formal appeals against disciplinary decisions.
- Grievances arising directly out of termination or dismissal.

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However, where such matters also involve concerns of unfair treatment, discrimination, harassment, retaliation, or violation of company policies, they may be raised through this Grievance Redressal mechanism.

/ 4 DEFINITIONS

TERM	DEFINITION
CONFLICT OF INTEREST	A situation in which a committee member has a personal, professional, or financial interest in the outcome of a grievance investigation that may compromise their objectivity or impartiality.
CRITICAL CASE	A grievance classified as critical where one or more of the following thresholds is met: (a) it involves an allegation of a fundamental human rights violation; (b) it carries material legal or regulatory risk to Dimexon; (c) it poses significant reputational risk to the Dimexon Group; or (d) it involves a Director, Board member, or member of senior management.
EXTERNAL STAKEHOLDERS	A term used to describe groups or individuals who are not directly employed or contracted by the business but are affected in some way by the decision of the organization such as customers, suppliers, community, NGOs, and the government.
GRIEVANCE	Grievance is any kind of dissatisfaction arising out of an action, or lack thereof, which needs to be addressed to enable all stakeholders to function efficiently and effectively. / it may be unvoiced or expressly stated by the employee / it may be written or verbal / it may be valid or legitimate, unsubstantiated or lacking merit. / it may arise out of something that relates to the organization in some way or the other.

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GRIEVANCE HANDLING MECHANISM	The process of accepting, evaluating, and resolving grievances received from the internal and external stakeholders.
INTERNAL STAKEHOLDERS	A term used to describe teams or people who work directly for the company, such as employees, members of management, board of directors and the contractual workforce.
RETALIATION	Any direct or indirect adverse action taken against a stakeholder as a consequence of their raising a grievance or making a report in good faith, including but not limited to dismissal, demotion, harassment, or exclusion, withholding of benefits, or any other unfavourable treatment resulting from the act of reporting.

/ 5 GRIEVANCE REDRESSAL CHANNELS

Dimexon provides multiple channels for raising grievances to ensure accessibility for all stakeholders regardless of location, language, or nature of concern. Stakeholders may choose the channel most appropriate to their situation.

/ 5.1 ESG REPRESENTATIVE

Grievances may be communicated directly in writing to Dimexon's ESG representatives at esg@dimexon.com. This channel is available to both internal and external stakeholders and is the primary point of contact for community-related concerns.

/ 5.2 EMAIL - ENTITY COMPLIANCE OFFICERS / MANAGERS

Grievances pertaining to payment, quality-related matters, contractual disputes, communication and transparency, unfair treatment, ethical and environmental concerns, supplier development,

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community matters, and general feedback may be submitted directly by email to the relevant entity:

ENTITY	GRIEVANCE EMAIL
India	infoindia@dimexon.com
Hong Kong	infohk@dimexon.com
UAE	infouae@dimexon.com
Belgium	infobelgium@dimexon.com
France	infofrance@dimexon.com
ESG / CSR (all locations)	esg@dimexon.com

/ 5.3 PHYSICAL DROP BOX

Internal stakeholders may submit written grievances by placing them in the suggestion/complaint drop box located at the security gate or at other designated locations as communicated during site-level training sessions across Dimexon facilities. Drop boxes are checked on a weekly basis by the location Committee member.

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/ 5.4 DIRECT MANAGER / HR CHANNEL (INTERNAL STAKEHOLDERS)

For routine workplace concerns, internal stakeholders are encouraged to raise the matter informally with their immediate supervisor or the HR Department in the first instance. Where the concern involves the supervisor, or the stakeholder does not feel comfortable doing so, they may proceed directly to a formal channel.

/ 5.5 ANONYMOUS REPORTING CHANNEL: WEB-BASED FORM

- Stakeholders may raise concerns anonymously through Dimexon's web-based grievance [reporting form](#), available on the company's website.
- Stakeholders are not required to disclose their identity or provide any personal information when submitting a report through this channel.
- All grievances submitted through the web-based form will be routed to responsiblesourcing@dimexon.com, Dimexon's dedicated channel for receiving and managing anonymous grievances. The form includes an option for the stakeholder to select the relevant country/location. Based on the location selected and the nature of the grievance, the complaint will be forwarded to the Presiding Officer of the relevant location-specific Grievance Redressal Committee for review and further action.
- Where there is uncertainty regarding the nature of the grievance, the relevant location, or the appropriate recipient, the matter will be referred to the central coordination point (HR) for guidance and onward assignment in consultation with the relevant internal stakeholders, as required.
- Anonymous grievances are recorded and maintained in the Grievance Register in the same manner as all other grievances, with the fields relating to stakeholder identity and contact details left blank or marked "Anonymous." Records are logged by the relevant location-specific Committee based on the location selected at submission, or by the central coordination point (HR) where no location is specified, and consolidated quarterly by the central coordination point (HR), in accordance with the record-keeping provisions set out in Section 6 and Section 16 of this Policy.

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- To ensure complete anonymity, this channel does not collect any information that could be used to contact or identify the person raising the concern. Accordingly, in its current capacity, it operates as a one-way reporting channel, and all anonymous submissions are reviewed confidentially and, to the extent practicable, investigated based on the information provided. Dimexon continues to strengthen its grievance channels to enable secure follow-up with anonymous complainants while fully preserving their anonymity.
- Anonymous grievances follow the timelines applicable to internal or external stakeholders, as set out in Section 7 of this Policy.

/ 6 GRIEVANCE REDRESSAL COMMITTEE

/ 6.1 ROLE

The Grievance Redressal Committee will receive all formal grievances on behalf of Dimexon and is responsible for ensuring that all grievances are acknowledged, investigated, and resolved in accordance with this policy. The Committee oversees the overall operation of the grievance mechanism and is the dedicated function responsible for the whistleblowing and grievance process from receipt through to resolution. Under the Committee, grievances will be classified based on severity and potential impact (including operational, reputational, and human rights risks). Critical cases (as defined in Section 4) will be escalated to the Board of Directors through the central coordination point.

/ 6.2 COMPOSITION

Dimexon operates across multiple geographies, each with distinct operational contexts and stakeholder needs. To ensure an effective and responsive grievance mechanism, the Company has established a two-tier structure comprising local handling at unit level and central coordination at Group level.

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/ 6.2.1 CENTRAL COORDINATION

- Human Resources serves as the central coordination point at Group level and holds overall governance responsibility for the grievance mechanism.
- A central grievance register is maintained to systematically capture and consolidate internal and external grievances across all units, with data logged through quarterly consolidation.
- Stakeholders dissatisfied with the outcome of the location-specific Grievance Redressal Committee may escalate the matter to the local Board of Directors. HR shall facilitate such escalation and ensure that the grievance is placed before the appropriate local Board representative for review. Where the grievance involves senior management, Directors, or Board members, the matter shall be escalated to an independent oversight body, as appropriate. These escalation and reporting protocols are reinforced through regular training and communication.
- Quarterly reporting to senior management and the Board includes grievance volume, categorisation, resolution timelines, substantive trends, and critical cases requiring escalated attention.

/ 6.2.2 LOCATION-SPECIFIC COMMITTEE

Each Dimexon location retains responsibility for local grievance handling. Each unit will have a committee constituted as follows:

- The Committee shall consist of the following representatives for every location: Site Heads or nominated representatives from respective sites, BU Heads, and employee representatives.
- Total members shall not exceed six per location.
- Minimum two female members, including at least one female member from senior management.

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- Composed in equal proportion by members of management and worker/employee representatives.
- Employee representatives can serve for a maximum of three years and cannot serve two consecutive terms.
- Where a worker raises a grievance, any request to be accompanied by a worker's representative must be accommodated.

/ 6.3 CONFLICT OF INTEREST

Any Committee member who has a conflict of interest in relation to a specific grievance must withdraw themselves from all aspects of that investigation and decision-making process. This includes situations where the Committee member is directly named in, or closely related to, the subject of the grievance.

If withdrawal of conflicted members leave insufficient members to meet the quorum requirement in Section 6.6, the grievance shall be escalated through one of these channels:

(a) **Referral to another location's committee:** A Grievance Redressal Committee is constituted using qualified members from another Dimexon location, as identified by the Central Coordination point (HR); or

(b) **Referral to external investigation:** An independent external investigator is appointed by the Board or by a non-conflicted Director.

The Central Coordination point (HR) must coordinate the referral without delay and maintain documentation explaining the decision and basis for withdrawal.

/ 6.4 PROTECTION FROM PERSONAL LIABILITY

No member of the Grievance Redressal Committee shall be personally liable for any act done or omission made in good faith while discharging their duties in connection with the receipt, review,

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investigation, recommendation, or determination of the outcome of any grievance under this policy. This protection shall not apply in cases of wilful misconduct, gross negligence, fraud, bad faith, or breach of confidentiality or applicable law.

/ 6.5 PRESIDING OFFICER

The Committee shall identify a Presiding Officer from amongst its members, responsible for receiving and logging all complaints, suggestions and grievances, issuing reference numbers, assessing their severity to determine the need for ad-hoc meetings, and maintaining an accurate and up-to-date grievance log.

/ 6.6 MEETINGS

- There shall be at least one formal meeting of the Grievance Redressal Committee each calendar quarter, with the Antwerp office at Belgium convening on a half yearly basis. Ad-hoc meetings may be called by the Presiding Officer where the nature or severity of a grievance requires immediate attention.
- A quorum for any meeting of the Grievance Redressal Committee shall consist of a minimum of 50% of the total Committee members, and must include at least one management representative and at least one worker/employee representative. No formal decision on a grievance shall be taken in the absence of a quorum.
- An acknowledgement will be sent to the stakeholder within 3 working days of drop box being opened / within 2 working days of email receipt. The Committee will endeavour to close the grievance within 45 working days of receipt.

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/ 6.7 OVERSIGHT

- Any stakeholder who is dissatisfied with the decision of the local Committee may reach out to any of the Company's Directors. The Central Coordination point (HR) will facilitate this escalation.
- Where grievances involve senior management, Directors, or Board members, the complaint shall be escalated directly to the Board of Directors. The Central Coordination point (HR) will facilitate this escalation.
- The Board may constitute an independent oversight body to review and address the specific matter, as appropriate. Such body shall operate independently of any individual named in or connected to the grievance and may be dissolved once the matter has been reviewed and addressed.
- To ensure independence, transparency, and impartial review, any Board member named in, connected to, or having a conflict of interest in relation to the grievance shall not participate in the review or decision-making process for that matter. Committee members named in or connected to a complaint will have restricted access to that report.

/ 7 COMPLAINT & ESCALATION PROCEDURE

/ 7.1 FOR INTERNAL STAKEHOLDERS

- **Informal Process:** When an employee faces a grievance, they are encouraged to raise the matter informally with their immediate supervisor in the first instance. The supervisor is expected to acknowledge the concern and work toward a resolution in a reasonable time.
- **Formal Process:** Where the informal process is not appropriate, has not been effective, or where the grievance involves the supervisor, the employee should use the formal channels described in Section 5.

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The formal process follows these steps:

STEP	ACTION	DETAIL	TIMELINE
1.	Submission	Stakeholder submits grievance via any channel listed in Section 5.	Any time.
2.	Acknowledgement	Presiding Officer or Committee member issues a complaint reference number to the stakeholder.	Within 3 working days of drop box being opened / within 2 working days of email receipt.
3.	Logging	Grievance is recorded in the Grievance Register with all relevant details. The grievance register template, including all data fields, is provided in Section 16 of this policy. The Committee will ensure that the following minimal set of information along with relevant dates is maintained: / The nature of the grievance / A copy of the written complaint received / Action taken with reasons / A written statement of the decisions / Minutes of the meeting All grievance records shall be maintained in secure systems with appropriate access controls and in compliance with applicable data privacy regulations.	Same day as acknowledgement.

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4.	Assignment	Presiding Officer forwards the complaint to the relevant Department Head for initial review and response.	Within 2 working day of receipt.
5.	Department Response	Department Head investigates and provides a response to the Committee.	Within 7 working days. If no response received, the matter is escalated to the Director.
6.	Investigation	Where required, the Committee conducts a full investigation in accordance with the principles of natural justice - impartially, confidentially, and as quickly as possible. The Committee submits a report with recommendations to the Director.	Within 30 working days. Any delay must be formally justified.
7.	Resolution	The Committee completes its proceedings and communicates the outcome to the stakeholder.	Within 45 working days of the written complaint or 7 days from completion of investigation.
8.	Remediation	Where a grievance is substantiated, appropriate corrective and preventive actions shall be implemented. Root cause analysis shall be undertaken to prevent recurrence, and actions shall be tracked to closure.	Within 30 calendar days of the Committee's decision. For complex remediation, an extended timeline may be approved by the Director in writing, not exceeding 60 calendar days. Completion of remediation must be signed off by the relevant Director

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			and recorded in the Grievance Register.
9.	Escalation	Any stakeholder dissatisfied with the Committee's decision may escalate to a Company Director or, where the grievance involves senior management, to independent oversight.	At any stage.

All grievances shall be investigated and resolved within a defined timeframe from the date of receipt; in cases requiring extended investigation, any delays shall be appropriately justified and communicated.

/ 7.2 FOR EXTERNAL STAKEHOLDERS

External stakeholders who have any grievance may submit it via email to the relevant entity address in Section 5, or directly to esg@dimexon.com. The following process applies:

STEP	ACTION	DETAIL	TIMELINE
1.	Submission	External stakeholder submits grievance via email or another available channel.	Any time.
2.	Acknowledgement	Committee / concerned members acknowledge receipt.	Within 3 working days.
3.	Assignment	Complaint is forwarded to the relevant Functional Head.	Within 2 working days of receipt.
4.	Investigation	Functional Head investigates in accordance with the principles of natural justice - impartially, confidentially, and as expeditiously as possible.	Within 30 days. Any delay must be justified.

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5.	Resolution	Committee communicates outcome and any remedial action to the stakeholder.	Within 45 working days of the written complaint or 7 days from completion of investigation.
6.	Escalation	Any stakeholder dissatisfied with the Committee's decision may escalate to a Company Director or, where the grievance involves senior management, to independent oversight.	At any stage.

All grievances shall be investigated and resolved within a defined timeframe from the date of receipt; in cases requiring extended investigation, any delays shall be appropriately justified and communicated.

/ 8 CONFIDENTIALITY

Dimexon will maintain confidentiality to the maximum extent possible, consistent with the need to conduct an adequate investigation and in compliance with applicable privacy laws. Information provided in grievance reports will be shared on a strict need-to-know basis, with the identity of the reporter and details of the report not disclosed to any party beyond those directly involved in reviewing and resolving the complaint, without the reporter's consent or unless required by law. Committee members named in or closely connected to a reported complaint will have their access to that report restricted.

/ 9 WHISTLEBLOWER MECHANISM

- Any stakeholder who becomes aware of suspected wrongdoing related to the matters covered under the grievance redressal policy is encouraged to report it, irrespective of whether they are personally affected.

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- Whistleblowing reports for workplace related grievances may be submitted through any of the grievance channels outlined in Section 5. Where the concern involves senior management, the report can be submitted directly to the Board or an independent oversight body.
- All reports will be investigated promptly and impartially, in accordance with the principles of natural justice. Whistleblower identity will be kept confidential on a need-to-know basis.

/ 10 NON-RETALIATION

Dimexon maintains a zero-tolerance policy for retaliation against any stakeholder who raises a grievance or reports a concern in good faith, meaning the individual genuinely believes the information to be true, regardless of whether it is ultimately substantiated. Any such individual shall be fully protected from reprisals, and any person found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

/ 11 IMPROPER COMPLAINTS

This policy shall not be used to bring frivolous or malicious complaints against anyone. If after the initial investigation it is found that a false complaint has been made, it will result in disciplinary action against the complainant.

/ 12 COMMUNICATION AND TRAINING

This policy and the available grievance channels are communicated to all employees to ensure awareness of the mechanism, reporting process, and protection against retaliation. Relevant personnel, including Committee members and Presiding Officers, are provided with appropriate training on their roles, responsibilities, confidentiality obligations, and fair handling of complaints, with a minimum annual refresher. New employees are informed of this policy as part of their induction, which shall be completed within 30 days of joining.

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/ 13 POLICY REVIEW

This policy will be reviewed by the ESG/ Compliance function at least every two years, or earlier if required due to:

- Changes in applicable law or regulation.
- Material changes in Dimexon's operations, structure, or supply chain.
- Significant grievance trends or incidents that indicate a need for policy revision.
- Any material changes to this policy will be communicated to all relevant stakeholders.

/ 14 REPORTING & CONTINUOUS IMPROVEMENT

Dimexon views the data gathered through the grievance mechanism as a valuable source of insight for continuous improvement.

- Central Coordinators (HR) will periodically review grievance data to identify trends, recurring issues, and systemic concerns.
- Further, periodic independent review of the grievance mechanism may be undertaken to assess its effectiveness and alignment with global best practices.
- Aggregated and anonymised grievance statistics, including number of grievances received, categories, resolution rates, and timelines will be reported in Dimexon's annual ESG Report and ESG KPI dashboard.

Findings from grievance trends may be used to inform updates to related policies, training programmes, and operational procedures.

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/ 15 POLICY LINKAGE

All Business Sustainability Policies including but not limited to

- Human Rights Policy
- Prevention of Sexual Harassment at Workplace (India)
- Code of Conduct
- Diversity and Inclusion Policy
- Non-discrimination Policy
- Health and Safety Policy
- Environmental Policy
- Responsible Sourcing Policy

/ 16 GRIEVANCE REGISTER

Complaint Reference No.		
Stakeholder information	Name of the grievant/ Employee No	
	Department & Designation	
	Mobile No & Email Address (if any)	

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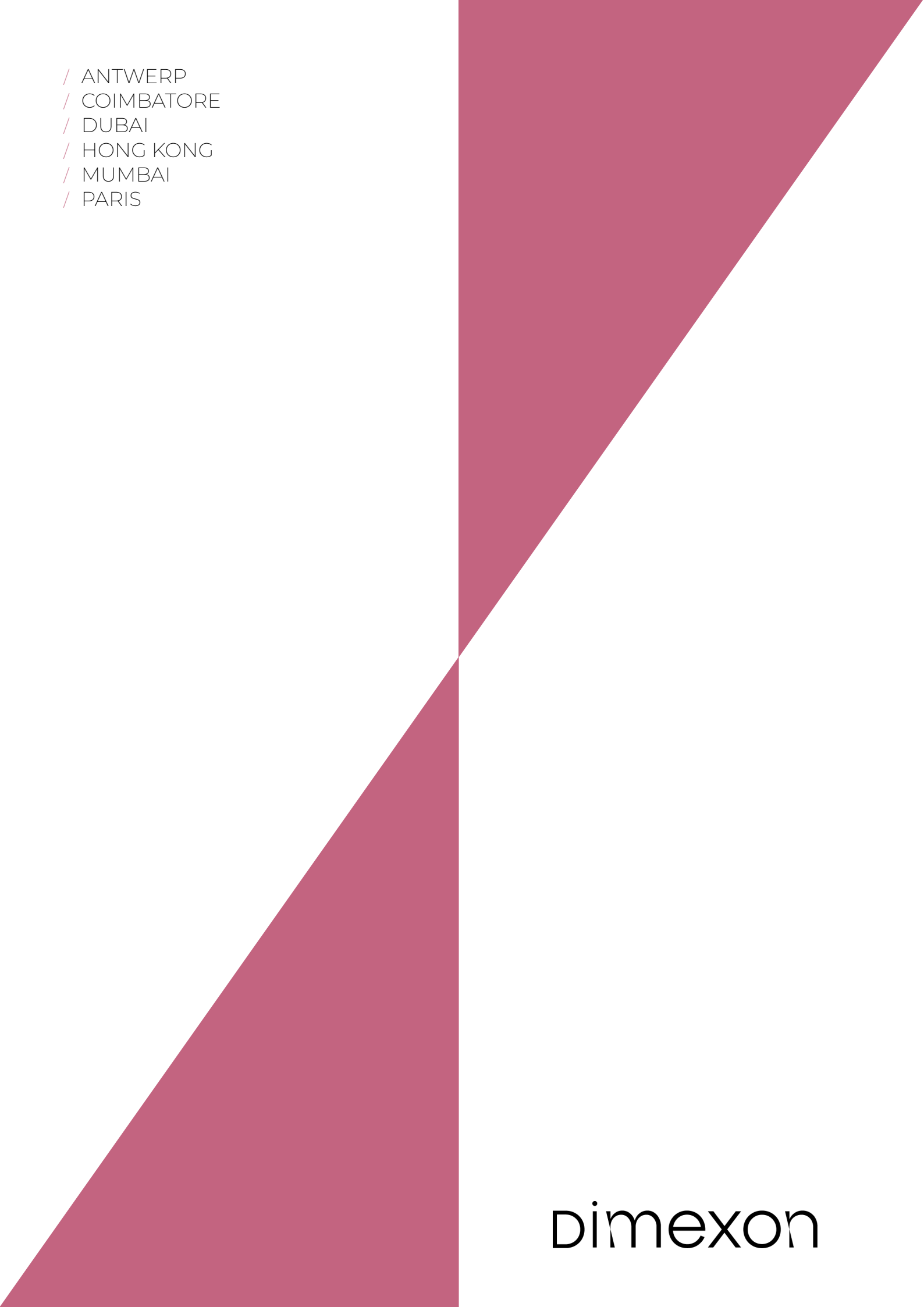
Date received	
Stakeholder Contact Person	
Grievance Description	
Cause of the Grievance	
Outcome	
Grievance Solution Dated	
Remarks	
Signature of Grievant	<i>I hereby declare that the information furnished above by me is true and accurate. Further, I understand that disciplinary action can be taken against me if the above allegations are found incorrect or malicious.</i>
Signature of HOD	

For the purpose of Head of the Department:	
Grievance no: (Dept ref no.)	
Received on: Whether interviewed employee: Yes/No	

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Sources and results of enquiry:	
Action taken:	
Date:	
Signature of HOD:	
Signature of grievant (Acceptable/Not Acceptable):	
Reason, if not acceptable (by grievant):	

For anonymous submissions, the fields relating to stakeholder identity shall be left blank or recorded as "Anonymous". All other fields must be completed to the extent information is available.



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