

Disciplinary and Grievance Policy

Kovon Global Private Limited | Level 2 Company-Wide Employee Policy

Policy owner	Head of People
Approving authority	CEO approval
Support	Legal / Compliance support where needed
Effective date	1 April 2026
Version	1.0
Review frequency	Annual, or earlier after legal change, serious incident, audit finding or management direction
Grievance channels	Manager, skip-level manager, Head of People, ethics@kovon.io , POSH IC for sexual harassment
Applies to	Employees, interns, consultants, contractors and agency workers, with action adapted to engagement type
Related policies	Employee Handbook; POSH Policy; Whistleblower Policy; Code of Conduct; Performance Management Policy; Leave and Attendance Policy

Fair process standard

Kovon will aim to handle grievances and disciplinary matters fairly, promptly, confidentially and consistently. Serious safety, security, retaliation, harassment, fraud or data-risk situations may require immediate protective action.

1. Purpose

Kovon Global Private Limited ("Kovon" or the "Company") adopts this policy to provide a fair process for raising workplace grievances and handling misconduct, policy breaches and disciplinary concerns.

The policy supports respectful resolution, due process, accountability, confidentiality, non-retaliation and consistent decision-making.

2. Scope and Applicability

This policy applies to employees, interns, consultants, contractors and agency workers. The type of action taken may differ based on employment status, contract terms, agency arrangement, applicable law and severity of conduct.

For non-employees, Kovon may apply contract action, access restriction, removal from assignment, vendor escalation, termination of engagement or other lawful measures instead of employee disciplinary steps.

3. Relationship with Other Processes

Certain matters must follow specialised policies or legal processes:

1. POSH complaints must be routed to the POSH Internal Committee and handled under the POSH process.
2. Whistleblower matters must be routed through the Whistleblower and Non-Retaliation Policy.
3. Performance issues should be handled under the Performance Management and Promotion Policy unless misconduct is involved.
4. Payroll, leave or attendance disputes may be reviewed under the relevant HR/payroll policy but may become disciplinary if records are falsified or misuse occurs.
5. Security, privacy, bribery, conflict or data incidents may require escalation under the relevant Level 1 policy.

4. Grievance Coverage

A grievance is a workplace concern, complaint or dispute that an employee or covered worker wants Kovon to review. Grievances may include:

6. manager conduct or unfair treatment;
7. bullying, harassment, discrimination, retaliation or hostile behaviour;
8. workload, work allocation, scheduling, leave, attendance or payroll issues;
9. team conflict, communication breakdown or workplace behaviour concerns;
10. policy interpretation, benefits administration or work conditions;
11. concerns about remote/hybrid work, tools, access or operational support;
12. other workplace concerns requiring HR or management review.

5. Grievance Channels

Grievances may be raised through the employee's manager, skip-level manager, Head of People, ethics@kovon.io, or the POSH Internal Committee for sexual harassment matters.

Employees should choose a channel that is appropriate to the concern. If the manager is involved in the grievance, the employee should use a skip-level manager, Head of People or ethics@kovon.io.

6. Informal Resolution

Routine concerns may be resolved informally through discussion with the manager, skip-level manager or Head of People where appropriate. Informal resolution should be practical, respectful and documented where it affects rights, pay, leave, role, conduct or future action.

Informal resolution is not required for serious matters such as harassment, retaliation, discrimination, fraud, bribery, safety threat, data breach, sexual harassment, violence or other high-risk concerns.

7. Formal Grievance Process

Kovon will seek to acknowledge grievance within 5 working days, conduct initial review within 10 working days and target closure within 30 working days, extendable for complex matters.

Stage	Target timeline / action
Acknowledgement	Acknowledge grievance within 5 working days where contact details are available.
Initial review	Conduct initial review within 10 working days to identify issue, process owner, urgency and routing.
Information gathering	Review documents, HRMS records, emails, messages, witnesses, manager input and policy context as relevant.
Resolution / decision	Target closure within 30 working days, extendable for complex matters.
Communication	Communicate outcome or next steps to the person raising the grievance, subject to confidentiality and privacy limits.
Follow-up	Track agreed corrective action, if any, and monitor retaliation risk.

8. Disciplinary Principles

Disciplinary action should be proportionate to the conduct, evidence, intent, impact, role, prior record, cooperation, legal requirements and business risk.

Kovon may use progressive discipline for ordinary issues, but serious misconduct may justify immediate protective steps and stronger action after due process.

9. Progressive Disciplinary Stages

Stage	Typical use
Coaching / counselling	Early correction for minor conduct, attendance, behaviour or process issues.

Verbal warning	Repeated minor issue or first moderate concern; active for 3 months.
Written warning	Serious or repeated concern; active for 6 months.
Final warning	Serious issue or failure to improve after warning; active for 12 months.
Suspension or access restriction	Protective or disciplinary measure where inquiry, safety, security, data or workplace risk requires it.
Termination	Serious misconduct, repeated failure to improve, abandonment, gross breach or other lawful reason after due process.

Kovon may skip stages depending on severity, risk, prior conduct, role, legal requirements or business impact.

10. Serious Misconduct

Serious misconduct may allow immediate suspension, access restriction and termination after due process. Examples include:

13. fraud, theft, misappropriation or falsification;
14. violence, threats, intimidation or unsafe conduct;
15. harassment, sexual harassment, discrimination, bullying or retaliation;
16. bribery, kickbacks, facilitation payments or improper candidate payments;
17. data breach, confidentiality breach, privacy breach or credential misuse;
18. candidate exploitation, client/vendor misconduct or serious conflict concealment;
19. abandonment / no-show, including 5 consecutive working days without approval or communication subject to contact attempts and notice where feasible;
20. gross insubordination or refusal to follow lawful and reasonable instructions;
21. substance abuse at work or being unfit for work due to intoxication;
22. criminal conduct affecting work, safety, trust, company reputation or legal compliance.

11. Investigation Process

Disciplinary matters will normally be investigated by the Head of People with manager input. Serious, senior-level, sensitive, legal, fraud, harassment, security, privacy or conflict matters may involve the CEO, Legal / Compliance, external investigator or specialist reviewer.

Investigations may include document review, HRMS records, system logs, emails, messages, interviews, witness statements, CCTV or access records where lawful and proportionate, and relevant policy review.

Covered persons are expected to cooperate honestly, preserve evidence and maintain confidentiality.

12. Show-Cause, Hearing and Response

Before major disciplinary action, Kovon should provide written notice of allegations and a reasonable opportunity to respond, except where immediate safety, security, evidence preservation, access restriction or legal steps are required.

The response may be written, meeting-based or both. Kovon may allow an employee to bring a colleague to a formal disciplinary meeting on a discretionary basis, considering confidentiality, sensitivity, role and process needs.

13. Suspension and Access Restriction

Kovon may suspend a covered person or restrict access pending inquiry where needed to protect people, evidence, systems, data, candidates, clients, vendors, workplace integrity or business continuity.

Suspension pending inquiry will be unpaid unless law, contract or management decision requires otherwise. Access restriction may include disabling systems, removing admin rights, pausing client/candidate interactions or restricting workplace entry.

Suspension or access restriction is not by itself a finding of misconduct.

14. Decision Authority

Action	Decision authority
Coaching / counselling	Manager, with HR awareness where needed.
Verbal warning	Manager + Head of People.
Written warning	Manager + Head of People.
Final warning	Head of People + CEO.
Suspension / access restriction	Head of People + CEO, with CTO/Security Owner input for system/data matters.
Termination	CEO + Head of People, with legal review where needed.
Senior management / CEO conflict	Board Chair or Board-designated reviewer.

15. Appeal Process

Employees may appeal major disciplinary action within 5 working days of communication. Appeals should be submitted in writing to the Head of People unless the Head of People is conflicted.

The appeal reviewer will normally be the CEO. If the matter involves the CEO or a senior-level conflict, the appeal reviewer will be the Board Chair or Board-designated reviewer.

Appeals should identify the reason for review, such as new evidence, procedural concern, disproportionate action, factual error or conflict of interest. The appeal outcome may confirm, vary, reverse or remit the decision for further review.

16. Recordkeeping

The Head of People maintains disciplinary and grievance records with restricted access. Records may include grievance submissions, investigation notes, notices, responses, evidence, warnings, decisions, appeals, closure notes and corrective action.

Records must be handled confidentially and retained according to Kovon's document retention requirements, legal holds and applicable law.

17. Warning Validity

Warning type	Active period
Verbal warning	3 months.
Written warning	6 months.
Final warning	12 months.

Expired warnings may still form part of employment records where legally and appropriately retained, but ordinarily should not be treated as active discipline unless a pattern or serious context justifies review.

18. Confidentiality and Non-Retaliation

Grievance and disciplinary matters must be kept confidential and shared only on a need-to-know basis for review, investigation, legal advice, decision-making, payroll/security action, Board escalation or compliance.

Retaliation is prohibited against any person who raises a grievance, reports concern, participates in inquiry, acts as witness, supports a complainant, refuses misconduct or cooperates in good faith.

19. Abandonment and No-Show

This policy cross-references the Leave, Holidays and Attendance Policy. Absence without approval or communication for 5 consecutive working days may result in termination after contact attempts and written notice where feasible, subject to applicable law, emergency circumstances and management review.

20. Review and Amendment

This policy will be reviewed annually by the Head of People and approved by the CEO, with Legal / Compliance support where needed. Kovon may amend disciplinary stages, grievance timelines, decision authority or process requirements based on law, audit findings, workforce needs or management direction.

Appendix A: Grievance Intake Checklist

23. Who raised the grievance and through which channel?
24. What is the issue, date, location, team and persons involved?
25. Does it need POSH, whistleblower, performance, payroll, security or privacy routing?
26. Is there immediate safety, retaliation, evidence or access risk?
27. What documents, HRMS records, messages or witnesses are relevant?
28. What outcome or support is requested?
29. What action was taken and when was the employee updated?

Appendix B: Acknowledgement

I acknowledge that I have received or been given access to Kovon's Disciplinary and Grievance Policy. I understand the grievance channels, non-retaliation protections, disciplinary process, cooperation expectations and consequences for misconduct.

Name	
Role / engagement type	
Department / function	
Signature / electronic acknowledgement	
Date	