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**Grievance Policy &
Procedure**

Department:
Human Resources

GLB-HR-21-04-INT

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To be read in conjunction with:

CONFIDENTIAL AND PROPRIETARY

Document History

Date	Version	Description	Author
01/01/2018	0.1	First draft	Gerry Cleary
01/31/2019	0.2	Slight adjustments to structure of verbiage, addition of Appendix	Gerry Cleary
7/30/2019	0.3	Slight wording edits – (a) Section 5 “workers” changed to “employees” for consistency with rest of document (b) Section 10 “personal representative” changed to colleague	Gerry Cleary
01/12/2019	0.3	No Changes	Gerry Cleary
12/16/2019	0.3	Reviewed and Approved	Audit Committee
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1. AIMS

This policy is designed to ensure that, where the company or the employee is not fulfilling their workplace obligations to each other, there is a defined impartial and consistent process through which such issues can be resolved.

2. SCOPE

The Grievance Policy applies to all employees of Keywords Studios (the “Company”) and is for the information of those who provide freelance or contractual services to Keywords.

3. REVIEW

The management team is responsible for the ongoing review of this document. This will be carried out annually or as and when organisational changes impact the way the company works. An amendment record will be maintained to document the changes made in each new issue.

4. FEEDBACK

Feedback regarding this document should be directed to any one of the department managers.

5. INTRODUCTION

In any company, employees may have problems or concerns about their work, working conditions or working relationships. It is in everyone’s best interest to ensure that these problems and concerns are not allowed to fester and develop into major problems.

The Grievance Procedure provides a mechanism for dealing with problems and concerns as quickly and as fairly as possible and at every level throughout the Company.

6. INFORMAL PROCEDURE

The first stage of resolving any grievance is usually to seek to resolve it in an informal manner, either with your manager or the individual with whom the grievance relates. You may seek advice from colleagues or the HR Department and they may become involved in seeking to resolve your grievance in an informal manner.

If the grievance is not resolved to your satisfaction at an informal level or if you would prefer to make a formal application in relation to your grievance, you should move to the next stage of this procedure.

7. FORMAL PROCEDURE

If you have a grievance relating to your employment which has not been resolved to your satisfaction at an informal level or, in relation to which, you would prefer to make a formal application, you will need to submit your grievance in writing, setting out the reasons for your grievance, either to your line manager or the HR Manager as appropriate.

The document containing the written details of your grievance should be marked “Formal Grievance” so that the recipient is in no doubt that you are following this procedure.

Once your grievance has been submitted the following principles will apply:

- Depending on the seriousness, the grievance will be investigated either by the person to which the grievance has been addressed or some other appropriate member of the management team.

- You will be notified of a date and time for a meeting at which you have the right to be accompanied by a colleague or personal representative of your choice so that your grievance can be heard.
- The investigating manager may ask you further questions or request further evidence at this meeting.
- The investigating manager may need to make a wider investigation, as appropriate, to establish and/or verify the facts.
- Every effort will be made to give a response in a reasonable time frame. However, depending on the complexity of the case, the investigating manager will update you as appropriate.
- Once a decision has been reached, you are entitled to appeal the decision, stating the reasons for your disagreement with the outcome.

8. APPEAL

Should you wish to appeal the decision, this should be submitted in writing to a person of appropriate seniority, (usually one level above the person who has heard the grievance), setting out the reasons for the appeal. The appeal should be submitted within 5 working days of receipt of the grievance decision unless a national employment contract clearly states a conflicting timeline. In this case, the national employment contract will take precedence.

The person holding the appeal will review the evidence against the grounds you have raised for appeal and make such enquiries as may seem appropriate to him or to her. You will be given an opportunity to state your case. Where new evidence comes to light it may be appropriate to adjourn the appeal hearing for further investigation.

The decision of the person holding the appeal will be final.

9. CONFIDENTIALITY

The company will aim to keep the facts and circumstances of your grievance confidential. However, that may not always be fully possible where, for example, a large number of your colleagues have to be interviewed in the process of resolving your grievance.

10. RIGHT TO BE ACCOMPANIED

You have the right to be accompanied to grievance hearings by a colleague. That person may attend the hearing and ask questions, but may not answer questions on your behalf. Your choice of person to accompany you must be reasonable. If your request is not reasonable, such as the person having a conflict of interest, you may be asked to choose an alternative person. If the person you have chosen to accompany you is not available on the date proposed for the disciplinary hearing, you may offer a reasonable alternative date.

The person conducting the grievance hearing and the person conducting any appeal will generally be accompanied by a colleague who will take written notes of the proceedings.

11. RECORDS

The company will usually retain copies of documents detailing the nature of any grievance, any action taken along with explanation, whether an appeal was lodged and its outcome, and any subsequent developments.

12. OTHER POLICIES

This policy can be used by any employee who wishes to raise a grievance. However, there are certain sorts of grievance which are better dealt with under other policies and if appropriate, you may be directed towards another procedure. In all situations, if a national policy is already in place, the guidelines of that policy are to be adhered to.

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13. RESPONSIBILITIES

Keywords Senior Management is responsible for implementing, maintaining and interpreting this document.

End of document.

Appendix – India Specific Instructions

INDIA STUDIO SPECIFIC CLAUSES

- Section #7 of the policy document, the Formal Procedure, states “If you have a grievance relating to your employment which has not been resolved to your satisfaction at an informal level or, in relation to which, you would prefer to make a formal application, you will need to submit your grievance in writing, setting out the reasons for your grievance, either to your line manager or the HR Manager as appropriate.”

Grievance submission at the India studio should be as per the below given matrix. However, the remainder of the process as mentioned in section #7 will be followed.

- Section #10 of the policy refers to the “Right to be accompanied”. This is not typical practice during an Indian Grievance Procedure and is not applicable to India Studios. HR will be present at all meetings at all levels to record the proceedings.

Role	Area of Grievance	First Level	Second Level	Third Level	Fourth Level
Artist	Project	Project Lead	Regional Art Director	Studio Art Director	India Production Head
	General	Regional Art Director	Studio Art Director / Studio Head	India Production Head	India CEO
QC	Project	Project Lead	QC Lead	Studio Art Director	India Production Head
	General	QC Lead	Studio Art Director / Studio Head	India Production Head	India CEO
Project Coordinator / Project Manager	Work Related / General	Sr. Project Manager / Project Manager	Lead Project Manager / Studio Head	India Production Head	India CEO
Testers (Babel)	Project/ General	Project Lead	Project Manager	QA Manager	Head HR / CEO
Other Departments including Localisation	Work Related / General	Manager	Department Head	India CEO / India Production Head (as applicable)	
<i>Note: At all levels it is mandatory to keep HR in loop.</i>					