

HR Policy cum Employee Handbook

The purpose of the Employee Handbook of India Home Loan Limited (“a Company”) is to assist employees in getting acquainted with the existing HR policies and as a guide during the tenure of employment with the organization. It provides background information about the organization, details of terms and conditions relating to employment, explains and describes the applicable HR Policies and Benefits.

Thus, the employee handbook would endeavor to fulfill the below objectives:

- *Facilitate an employee’s stay and working in the organization.*
- *Provide in a consolidated form, the service conditions in the organization.*
- *Improve awareness about the organization.*

All employees are required to read the contents carefully. In case of any doubt, please do not hesitate to consult Senior Management for clarification(s).

Coverage

- *This Handbook is applicable to all employees of India Home Loan Limited*
- *This Handbook is the property of India Home Loan Limited and it contains confidential information which should not be shared with any person not employed by the organization. The contents of this document are subject to change / modifications, as per business requirements. The Company therefore reserves the right to revise, supplement or rescind any policy or portion of the handbook from time to time as it deems appropriate, in its sole and absolute discretion and consistent with the requirements of law.*

Contents

Section 1 – Introduction

This section contains a brief overview of the organization, its background and standards of business conduct for employees

- 1.1 About India Home Loan Limited
- 1.2 Vision and Mission
- 1.3 Standards of Business Conduct

Section 2 – General Information

This section provides information required by an employee to settle down easily & quickly on the job.

- 2.1 Workplace Guidelines
- 2.2 Information Technology Security Policy
- 2.3 Information Technology User Policy and Guidelines

Section 3 – People Processes

This section provides information on HR Processes that will help employees during their working tenure in this Organization.

- 3.1 Equal Employment Opportunity Policy
- 3.2 Recruitment Policy
- 3.3 Induction
- 3.4 Working Hours / Attendance & Punctuality
- 3.5 Work Attire Policy
- 3.6 Probation Policy

3.7 Performance Management Philosophy

3.8 Compensation Philosophy

3.9 Training & Development

3.10 Promotion Guidelines

3.11 Disciplinary Policy

3.12 Grievance Handling Policy

3.13 Exit Policy

3.14 Retirement Policy

Section 4 – People Benefits

This section presents policies related to benefit schemes for employees .Any changes to these items will be posted on the connect or notified to each employee separately through his/ her Manager.

4.1 Leave Policy

4.2 Provident Fund Benefit

4.3 Gratuity Benefit

4.4 Transfer Policy

4.5 Miscellaneous

Section 1: Introduction

1.1 About India Home Loan Limited

An overview

India Home Loan Limited is registered with National Housing Bank (NHB) as a Housing Finance Company which offers retail home loan product for affordable housing segment. The Company operates through its own offices, Direct Selling Agents (DSA) and Business partners.

The equity shares of India Home Loan Limited are traded on the Bombay Stock Exchange Limited.

Our History

India Home Loan Limited was formerly known as Manoj Housing Finance Company Limited (MHFCL) which was incorporated on 19th December 1990 under the Companies Act, 1956 in Maharashtra. In 2009, the name of Manoj Housing Finance Company Limited was changed to India Home Loan Limited. The company came out with an IPO (Initial Public Offering) in 1995 to augment its long term resources to meet the needs of the business of housing finance and enhance its borrowing capacity by improving its net worth.

Our Business

India Home Loan Limited provides home loans in the affordable housing segment, especially to the unserved segment with unmatched quality of service, transparency through the loan procedures and aims to deliver a supportive experience till the client is satisfied.

Our home loan is offered under various schemes to professional as well as self-employed individuals for construction or purchase of dwelling units at village, towns and cities. The loans are offered under both

fix and variable rate option with monthly amortization as per the client's requirements.

1.2 India Home Loan Limited – Vision and Mission

Vision

An organization's Vision lays down the Big Audacious Goal that helps the institution express its envisioned future.

“ To become the most preferred, sustainable housing finance company in India through world class performance , creating growing values for the housing sector and the company's' stake holders”

Thus to achieve the Mission and the Vision of the organization the entire methodology revolves round the Corporate Governance which revolves around the Employees only.

Mission

A mission defines the reasons for the existence of the Institution. IHLLS' Mission would be “To enhance the wealth generating capability of the Institution in the present & future economic environment and delivering a steady and sustainable stakeholders' value.”

The mission could only be achieved through organizational values like Accountability, Teamwork & Respect for All, Transparency & Fair Practice, Customer Friendly Policies and Service, Truthfulness & Integrity. Uniformity, Work Discipline, Professionalism, Dedication, Commitment & Quality of Service, Effectiveness and Efficiency.

Thus to achieve the Mission and the Vision of the organization the entire methodology revolves round the Corporate Governance which revolves around the Employees only.

1.3 Standards of Business Conduct

Code of Conduct

The Company's Code of Conduct provides guidance on a variety of issues, including harassment policy, gifts giving and receiving, employee trading, confidentiality of information, contact with the press, substance abuse, employee relationships and several other matters.

Employees are responsible for reading, understanding, and complying with the Code of Conduct, including the supplement. Newly hired employees are given a copy of the Code of Conduct along with the letter of appointment. They must sign and return the acknowledgment form to the Compliance Department as a token of acceptance of the Code of Conduct.

Questions should be directed to the Human Relation Department. Please note as and when the Code of Conduct is revised and updated employees will be expected to sign an acknowledgement conCompanying

that they have read, understood and will comply with each new version when it is published. Employees are expected to refrain from any activities that may damage the reputation and interests of the Company.

Code of Conduct (Compliance) Manual

The Code of Conduct broadly outlines the policies and procedures to be followed by professionals in all the Departments of the Company, wherever applicable. All professional employees of the Company are responsible for reading, understanding, and complying with the procedures laid out in the Code of Conduct. All new hires shall be given an acknowledgement slip which they must sign and return to senior management as a token of having read and understood the contents of the manual.

Telephone and Voice Recording

In general, only business related calls should be made on office telephones. Personal calls may be necessary in certain circumstances but should be kept to a minimum.

We have assigned Codes for the clients / projects to ensure a proper cost tracking mechanism. These will be issued from Controllers from time to time.

Employees can make STD / ISD calls by using appropriate codes. Please call the IT help desk for more information.

The Company reserves the right to record any conversation as it may deem fit from time to time.

Personal Information

The Company processes employee personal information from a variety of sources (including from employees themselves) for a variety of lawful purposes including for non-obvious business purposes. Employees are required to submit certain personal data to management upon joining and during the course of their employment with the Company. To ensure that all information is up to date, employees should immediately notify senior management whenever there are changes to any of the following: employee's name, home address, telephone number, bank account number for payroll purposes, marital status, number of dependents, or educational qualifications.

Employee information may be disclosed, or made available to, third parties (including to third parties outside India) where required by law, regulation or in the ordinary course of business. To ensure proper handling, any such request for employee information (including contact information and employment related references) must be referred to senior management. For security reasons, such information must not be given out by another department or employee.

Employees must handle personal information only as required by their duties and should only process such information in a manner within the scope of that Employee's job function.

Staff Obligations

As a condition of employment, all staff members are required to report to their Supervisor/Manager in any of the following circumstances:

- Bankruptcy/insolvency
- Arrest and remand in custody
- Conviction by a court of any criminal offence (except road traffic offences unless the penalty is imprisonment or disqualification).

Use of Internet and E-mail Facility

Employees should ensure that they are familiar with the Company's Information Security Policies applicable to them. Please refer to the Company Information Security Policy for further details.

Access to Company's electronic facilities and systems is provided for the use in connection with the

Business of the Company. Any other use except for reasonable and occasional use is prohibited. All information stored in the Company's facilities, including electronic systems, is regarded as the Company's property. Consequently, as part of the Company's compliance program, properly authorized persons may, from time to time, be given access to individual employee's files, including stored electronic mail and voice-mail messages, word processing files, and other information files. In addition, the Company reserves the right to monitor all correspondence received or sent by employees in the office.

Employees should note that the transmittal (including forwarding) or downloading of inappropriate or offensive materials or messages on Company systems, is a violation of the Code of Conduct and Web Usage policy, and can result in disciplinary actions, up to and including termination of employment.

Please refer to Section 2 - 2.3 for detailed India Home Loan Limited Information Technology Policies.

Section 2: General Information

2.1 Workplace Guidelines

A. Housekeeping Rules

- Keep noise to a minimum during meetings, telephone calls, etc. Do not use speakerphones on open floors.
- Desktops should be kept clean and orderly with files put away after use.
- Excessive personal belongings, which affect productivity, create a nuisance, or damage the facilities, should be removed.

B. Safety and security

- It is the responsibility of all employees to be fully conversant with building evacuation procedures.
- Keep aisles and hallways free of obstructions.
- Keep all exit routes clear at all times.
- Staircases, landings, electrical closets and machine rooms should not be used for storage.
- Smoking is prohibited in all areas within the office premises including staircases and balconies.
- Personal items should be kept in a secure place and out of view.
- To prevent fire or overloading, personal electrical equipment, such as fans, lights, etc. are not permitted without prior permission.
- All exit and entrance doors should be kept closed and locked at all times.
- Identity cards should be carried by all employees at all times.
- Report suspicious persons to the Administration.

C. Workplace standards and maintenance

- Please keep windowsills and air vents free of books, files, plants, papers etc.
- Artwork should not be displayed or moved.
- Fixing of paper to the workstations is permitted only on the soft-board. Where pinning is required and provided no damage is done to the panels, pinning by non-stick 'Scotch Tape' is permitted.
- Prior approval from senior management is required for the display of promotional material / posters and must be removed after the use is over.
- Nailing and drilling into partitions or walls of the building is not permitted. Nothing should be stuck to doors, walls, columns and windows.
- No personal furniture and equipment is allowed.

D. Hygiene Standards

- All common areas, washrooms etc. should be kept clean, tidy and in a hygienic condition at all times

E. Environmental consciousness

- ☐ Lights and all equipment should be turned off when not in use.
- ☐ Please dispose of paper in the recycling bins provided.
- ☐ Return all surplus or non-functional equipment to the administration department.
- ☐ Furniture that is no longer used or is not part of the original design should be reported to administration department for removal.

F. Clear Desk Guidelines

- ☐ Ensure personal valuable items are secured when the office is vacated or you are away from your desk, including cash, mobile phones etc.
 - ☐ When you leave your desk, protect sensitive information by switching your computer monitor off.
 - ☐ Shut down computers when the office is unattended and secure all files in locked filing cabinets, with keys secured separately.
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2.2 Information Technology Network Security Policy

Objective

To provide and ensure controlled access to Network resources and services on need-to-know basis.

Scope

This document addresses Policies related to the Network security of information and information resources.

Applicability

The policy detailed in this document is applicable to all Network information assets of India Home Loan Limited and the personnel.

Policy

India Home Loan Limited's Network resources must be used for valid business purposes only. The protection of information contained on the company networks is therefore the responsibility of the management and the activity and content of user information on the company computer networks is within the scope of review by management.

The Company shall develop and implement Network security procedures, and provide Network security resources (Router, Firewall, and Proxy, IDS etc.) to protect all business data, related application systems and operating systems software from unauthorized or illegal access at a level that is appropriate for the information resources.

a) Network Access

- Access to the Network and Network resources must be on need-to-know basis and authorizations must be obtained from Head-IT before providing access.
- All Network resources and services at India Home Loan Limited must be identified and briefly documented.
- Network resources and Network services required for every job function and role must be identified and documented.
- Access to Network resources and Network services must be based on the job function and role i.e. on need-to-know basis. Users' connection capability will be restricted through access-control lists in Routers, Firewalls and Layer 3 Switches. Additional services more than what is required for the job function must be allowed only after getting such intimation from Human Resources and approved by Head-IT.

- System administrators must ensure that the host operating system is configured to validate each user prior to allowing network access to the various information resources.
- Access to critical devices like routers, firewalls, switches, proxy, content filtering devices, etc. should be restricted only to authorized terminals. The devices can be managed from only from these authorized terminals in order to implement a principle of enforced path.
- Network and network services access must be periodically reviewed in order to ensure that unauthorized network services are not used or authorized services are not accessed by unauthorized personnel.
- Policies detailed in Access Controls Policy – User Account Management shall be followed for providing access to network resources & network services.
- Networks must be logically or physically divided based on the criticality of the information stored in the networks. If the network is logically separated, appropriate perimeter security devices must be put in place. If the network is physically separated, controls must be in place to protect physical access to the network points at all ends.
- All network equipment default passwords (e.g., routers, firewalls, switches, etc.) must be changed by the System administrator during installation.
- All kind of changes in the configuration including replacement / up gradation / change in the configuration (major or minor) should be approved by Head-IT. Minor changes like addition/deletion of access control list can be done in the production environment during business hours subject to the impact analysis and proper roll over plan. Major Changes to network configurations like up gradation of version, replacement, etc. must be done only after business hours.
- To maintain the privacy of the company information, company networks must not be used for personal and/or private information unrelated to business activities. The Company's computers and resources must be used for valid business purposes only.
- Access to local system control utilities (e.g. Batch Files, Scripts, Executable files, admin utilities, etc.) must be controlled. Access to these utilities should be limited to authorized IT personals only.
- A legal message must be displayed on the screen whenever a user logs on to the network through any terminals to warn the user on using the Company's Network for business use only. A message must be displayed on all external Network connections warning potential user that unauthorized use is prohibited.
- IT Department must implement adequate security controls to prevent users from attaching any hardware or install remote access communications software (software that allows a remote user to dial into a PC attached to the network and commands from it as if it were attached to the network itself). The use of personal communications equipment attached directly to personal computers with remote control software must be prohibited. All the systems connected (wired/wireless) on organization network should be kept behind firewall. Any incoming traffic should be scanned for virus, SPAM Mail, Attack. All entry point should be properly protected with firewalls

b) Access to Third Party

- Access to the service providers, third party vendors, partners, or any other external parties must be given after carefully analyzing need and after assessing risks involved in providing such access. Defined procedures must be followed in providing such access.
- Such given access to the information resources must be restricted and governed by the principle of least Earned and need-to-know basis. The company's authorized employees coordinating with the respective third party consultants, engineers vendors representatives etc. are responsible for justifying and authorizing the access rights granted to third parties. All logical access granted to third parties should be approved by Head –IT

- System administrator should ensure that the access rights granted to such third parties should be revoked as soon as the required assignment is over.
- Authentication mechanisms should be required when accessing the Company information assets from public access, telephone, or third party networks. At a minimum, this authentication mechanism must consist of a unique user-id and password that complies with the Company information Security Policies.

c) Internet Service Management

- Access to the internet must be provided only to those employees who have a legitimate business need for such access. The authorization to access internet for an individual depends on:
 - i. The nature of work that requires the user to connect to the internet
 - ii. The sites that he is authorized to access on the internet
- On need basis, the users shall be granted access to the Company's Wi-Fi network so that hand held devices can access internet. However the Wi-Fi network shall primarily be used for official purpose. And user is sole responsible for all the activities done from his/her devices.
- Users are not allowed to access Internet from their desktops through phone lines or wireless connectivity in the office premises when the proxy connectivity is available.
- All Internet activity must pass through the company's Firewall and the Proxy gateway server to the Internet so that access controls and related security mechanisms can be applied.
- All users must be authenticated by their domain user-ID and the password at the proxy gateway server. The authentication mechanism can be NTLM based to avoid entering of username and password for proxy authentication. The proxy gateway software shall have the following policies.
 - i. Internet access can be customized and restricted to the authorized individuals based on the business need.
 - ii. Sites that are not related to business activities should be restricted.
 - iii. Sites providing offensive / indecent content and free software shall be blocked at all times.
 - iv. Downloading of malicious files should be restricted.
 - v. Securing web traffic by scanning the content for Malicious Software
- The router connecting the internal network to the Internet cloud must restrict all services except minimum required for web browsing and to accomplish work

- Private email sites or any such sites which provides the facility of information sharing/files upload should be restricted. If private email sites are allowed then restriction should be put in place for uploading of files.
- All Internet services and applications (like Instant Messaging, file-sharing application, Chat, etc.) which are not necessary for a business need, must be disabled or uninstalled. Exceptions should be approved by the appropriate authorities and documented.
- Both Inbound/Outbound FTP services with Internet must not be allowed, unless they are business essential and approved by the appropriate authorities.
- Both Inbound/Outbound Telnet services with Internet must not be allowed.

d) Network Management

- All network equipment and communication lines must be identified, documented and updated regularly.
- Network diagrams at all levels (WAN & LAN segments) must be maintained and updated regularly.
- Minimum Baseline Security Standards (MBSS) must be developed and maintained.
- All network equipment must be configured as per MBSS.
- All network services that are not required on the servers must be disabled. Services that are required should be documented.
- Any problems with the network equipment leading to delay or stopping of any business processes must be escalated as an Incident.

- Network Address Translation (NAT/PAT) shall be done to isolate the internal network and protect private IP addresses.

- All IT assets should be updated (OS security patches and hot fixes) to the latest stable version but not later than three months. However the updates should not impact business requirements.

- All hosts that run applications or contain data that are non-public must be isolated behind a firewall from public external networks.

- i. All traffic from inside the company to external networks, and vice-versa, must pass through a gateway (or firewall) that does not serve as a general-purpose host and therefore does not require features, which weaken security (e.g., rlogin, etc.)

- ii. The Head-IT must authorize any connectivity to the external network.

- iii. The firewall and routers must be hardened against penetration.

All the activities listed above should be performed by the Manager-IT and authorized by Head-IT.

In case of VPN connectivity appropriate measures should be taken to ensure that the data won't be compromised. Site-to-site VPN and Client-to-site VPN technologies should be adopted wherever necessary.

In case of VPN connectivity, appropriate measures should be taken to provide the access on need-to-know basis. Appropriate access controls should be put in place by means of allowing access on business requirement and need-to-know basis on various information resources and placing access control list on

the entry points (routers, firewall, switches, etc.) An ISO should do the necessary impact analysis and the controls suggested should be approved by Head-IT.

e) Network Security monitoring

- Systems should be monitored to ensure conformity to logical access policies and procedures.

- Logs from various network equipment leading to delay or stopping of any business processes must be escalated as an Incident Management Policy.

f) Data Transmission

- Any information from India Home Loan Limited environment traveling over third-party networks or public networks must be encrypted. Appropriate encryption algorithms must be used to maintain the integrity and confidentiality of the data.

- Confidential information not being actively used, when stored or transported in computerreadable storage media (such as, floppy disks, CDs, DVD's, DLTs, Pen Drive, etc.), is recommended to encrypt if requested by information owner.

- To prevent unauthorized disclosure of data when computers are sent out for repair or used by others within or outside the organization and data cannot be deleted; all data stored on hard disks must be encrypted via user-transparent processes.

g) Network Assessment

- Network vulnerability assessments must be performed on an ongoing basis by competent personnel. The risks identified should be documented in the assessment report.

- Assessment report shall be submitted to the Key management regularly.

- Third-party independent network assessment shall be carried in order to provide assurance to the management.

Execution Responsibility

The Head-IT is responsible for implementing and executing the procedures mentioned in this documents.

Information Security Officer shall periodically review and monitor the network security configuration.

2.3 Information Technology User Policy and Guidelines

Objective

To make the user aware of their security responsibilities in order to ensure security of the information

and information resources they interact with.

Scope

This Policy documents the responsibilities of the employees of India Home Loan Ltd who are users of information resources. Compliance with this Policy is essential in creating an environment that is conducive to sound security practices.

Applicability

This policy applies to all users of information assets including India Home Loan Limited employees, employees of temporary employment agencies, vendors, business partners or group companies availing the services, and contractor personnel.

Policy

a) Acceptable Use Policy

i. Usage of India Home Loan Limited Information Systems

- Users are only authorized to utilize the Company's information resources for the Company's business purposes for which they have been authorized. Usage of the Company's information systems and resources for personal usage or on behalf of a third party (i.e., personal client, family member, political or religious or charitable or school organization, etc.) is strictly prohibited.
- Users must avoid accessing areas on the company networks for which they do not have a valid business need. While networks are intended to share information, it is each user's responsibility to exercise judgment over the information they access.
- Usages of the Company's information systems to store, process, download, or transmit data that can be construed as biased (politically, religiously, racially, ethnically, etc.) or supportive of harassment is strictly prohibited.
- Downloading, redistribution and printing of copyrighted articles, documents, or other copyrighted materials to the Company's information systems are strictly prohibited.
- Receiving, printing, transmitting, or otherwise disseminating proprietary data, company secrets, or other confidential information in violation of company policy or proprietary agreements is strictly prohibited.
- Uploading, downloading or viewing inappropriate material such as picture files, music files, or video files for personal use is strictly prohibited.
- Users should terminate active sessions when finished, unless they can be secured by an appropriate locking mechanism, e.g. a password protected screen saver;
- Users are prohibited from changing the configuration of, removing, de-activation or otherwise tampering with any Virus and Malicious Software prevention/detection and other software installed on the systems used by them.

ii. Introduction of Unauthorized Copies of Licensed Software & Hardware

- Introduction of unauthorized copies of licensed software & hardware (piracy/copyright & patent infringement) to the Company's information resources and the copying of such material is prohibited.
- The storage, processing, or transmittal of unauthorized copies of licensed software & hardware (piracy / copyright & patent infringement) by the Company's personnel associates is strictly prohibited.

iii. Introduction of Open-source, Freeware and Shareware Applications

- Introduction of Open-source, Freeware and Shareware Applications whether downloaded from the Internet or obtained through any other media to the Company's information systems will be subject to a formal evaluation and approval process by IT Department.

- Open–source, Freeware and Shareware Applications should be evaluated and tested by the IT department before installation on the Company’s Information Resources. They must verify the legal implications of using the same in the Company’s Information systems.

iv. Introduction of Pornographic Material

- Introduction of pornographic material into any India Home Loan Limited information systems environment is strictly prohibited. The storage, processing, or transmittal of pornographic material on the Company’s information systems, by India Home Loan Limited employees, contractors or associates is strictly prohibited.

v. Due Diligence

- Each user has the responsibility to notify the IT department immediately of any evidence of or suspicion of any security violation with regard to:

- ✧ Unauthorized access to network, telecommunications, or computer systems;
- ✧ The apparent presence of a virus on a PC;
- ✧ The apparent presence of any information resource prohibited by this policy;
- ✧ Apparent tampering with any file for which the user established restrictive discretionary access controls; and
- ✧ Violation of this Policy or any other Information Security policy or procedure by another user, employee, contractor or third party service provider.

vi. Computer Games

- Playing computer games in India Home Loan Limited premises is prohibited. Users should not install any computer games in India Home Loan Limited information resources they have been provided.

vii. Introduction of Destructive Programs

- Introduction of destructive programs (e.g., viruses, self-replicating code) in order to cause intentional damage, interfere with others, gain unauthorized access, or inhibit production to India Home Loan Limited information systems, is strictly prohibited.

b) Reporting Incidents

Incident is defined as the occurrence of any exceptional situation that could compromise the Confidentiality, Integrity or Availability of Information and Information Systems of India Home Loan Limited. It is related to exceptional situations or situation that warrants intervention of senior management, which has the potential to cause injury or significant property damage. Software malfunctions, virus, theft, etc. and any violations of India Home Loan Limited security policies and procedures shall also be considered an incident.

- If any user comes across any exceptional situation as mentioned above he/she should immediately inform the Head-IT and Head-HR.
- The users should not try and test weaknesses, since it might be interpreted as misuse of the system.

c) Password Use

Passwords provide a means of validating a user’s identity and thus to establish access rights to information processing facilities or services. All users should:

- Keep their passwords confidential
- Should change the initial passwords provided by the engineers immediately;
- Avoid keeping a paper record or passwords, unless this can be stored securely;
- Change password whenever there is any suspect or indication of possible system or password compromise;
- Select quality passwords with a minimum length of 8 characters, which are complex in nature i.e.

combination of uppercase, lowercase characters, numeric numbers and special characters like !, @, #, \$, ^, & *

- Change passwords at regular intervals of 4 weeks (passwords for Earned accounts should be changed more frequently than normal passwords), and avoid re-using or cycling old passwords;
 - Change temporary passwords at the first log-on;
 - Do not include passwords in any automated log-on process, e.g. stored in macro or function key;
 - Do not share individual user passwords.
- Five successive login failures should result in a user's account being locked; they should not be able to login until their account is unlocked and the password reset. The user in this case should contact the IT department for getting the account unlocked.

d) Virus Protection

- Users should not open any files attached to an email from an unknown, suspicious or untrustworthy source.
- User should not open attachments that are from an unknown or non-trusted source. Attachments with extensions such as 'exe', 'vbs', etc. should be blocked by the content filtering system.
- User should not open any files attached to an email whose subject line is questionable or unexpected. If there is a need to do so, they should inform IT.
- Users should delete chain/junk emails and not forward or reply to any of the chain/junk mails. These types of email are considered Spam, which is unsolicited and intrusive that clogs up the network and affect in India Home Loan Limited information resources.
- Users should exercise caution when downloading files from the Internet, and should download only from a legitimate and reputable source.
- When in doubt, do not open, download, or execute any files or email attachments.

e) E-mail

- Each employee is responsible for the contents of his/her e-mail and all actions performed using his/her email logon credentials.
 - Email should be used only for business purposes. Personal or non-business use of the Systems is not permitted.
 - Only the email client authorized for use by IT Department should be used.
 - User should use only their own India Home Loan Limited E-Mail account and should not allow anyone else to access their account. Users should identify themselves by their name; pseudonyms that are not readily attributable to actual users should not be allowed. Users should not represent themselves as another user. Each user should take precautions to prevent unauthorized use of the E-mail account. Forging of header information in E-Mail account. Forging of header information in E-Mail (including source address, destination address, and timestamps) is not permitted.
 - Users should not provide other unauthorized persons with their E-Mail ID and password.
 - Users should not send confidential or restrictive information via E-mail, unless the information is encrypted using approved encryption technique.
 - E-Mail should not be used to transmit or receive statement that contains any material that is offensive, defamatory, or threatening to others.
 - Employees may either communicate with the originator of the offensive E-mails, asking him/her to stop sending such messages, or report such offensive E-mails directly to Information Security Officer.
- Users should not post server or network configuration information about India Home Loan

Limited information resources to public newsgroup or mailing lists. This includes internal machine addresses, server names, server types, or software version numbers.

- Users who cannot access their email for long periods (due to vacation, outstation work etc.) should use “Out of Office” feature in India Home Loan Limited email system.
- Users must not employ a scanned version of a hand-rendered signature to give the impression that the sender signed an E-mail message or other electronic communications, as another person could misuse the signature.
- Users should not modify the security parameters within India Home Loan Limited E-Mail system.
- Users should not send unsolicited bulk mail messages. This practice includes, but is not limited to, bulk mailing of commercial advertising and religious or political tracts. Malicious E-Mail, including but not limited to “mail bombing”, is prohibited.
- At any time, with or without notice, this information may be monitored, searched, reviewed, disclosed, or intercepted by India Home Loan Limited for any legitimate purpose, including the following:
 - i. To monitor performance,
 - ii. Ensure compliance with India Home Loan Limited policies,
 - iii. Prevent misuse of the Systems,
 - iv. Troubleshoot hardware and software problems,
 - v. Comply with legal and regulatory requests for information, and Investigate disclosure of confidential business, proprietary information, or conduct that may be illegal or adversely affect India Home Loan Limited or its associates.

f) Physical Security

- Users should not enter India Home Loan Limited data center.
- Users should not take in or out any equipment from India Home Loan Limited, without authorization.
- Users should adhere to all physical security standards to be followed in India Home Loan Limited

g) Handling Confidential Information

- Confidential/restricted information transmitted over any communication network should be sent in an encrypted form.
- Confidential information not being actively used, when stored or transported in computer readable storage media (such as magnetic tapes, floppy disks or CDs), is recommended to be in encrypted form.
- To prevent unauthorized disclosure of data when computers are sent out for repair or used by others within or outside India Home Loan Limited, and data cannot be deleted, all data stored on hard
- The strength of the encryption algorithm to be used in a given situation should be based on the classification of the data to be encrypted.

h) Use of Office equipment

1. Telephone

- Staff should not reveal sensitive or classified information over the telephone unless the telephone lines have been specifically secured for this purpose – for example through the use of encryption.
- Staff should not enter into the conversation or reveal any information to over the telephone where the identity of the caller cannot be determined.
- Where appropriate, staff should conCompany telephone conversations by creating signing and acknowledging a formal written transcript of the conversation.

- Staff should not reveal or store confidential messages on answering machines or voice-mail services.
- All parties on a telephone call should be notified in advance if the call is to be recorded.

2. Modem

- Modems should not be attached to workstations.
- Laptop users should not connect to the public domain using the internal modems in laptops
- External Data Cards/ Modems should not connect to systems when on the Company's Network.
- No data transfer should take place by way of a modem.

i) Internet User Code of Conduct

1. Internet "inappropriate" use

The use or attempt to initiate such activities using India Home Loan Limited computing facilities or equipment leading to abusive, unethical or "inappropriate" use of the Internet are considered grounds for disciplinary, legal and/or punitive actions, including termination of employment.

Examples of prohibited employee Internet use include, but are limited to, the following:

- Introduce material considered indecent, offensive, or is related to the production, use, storage, or transmission of sexually explicit or offensive items on the company's network or systems, using internet.
- Conduct illegal activities, including gambling, access or download pornographic/illegal material.
- Enter into contractual agreements via the Internet, e.g. enter into binding contracts on behalf of India Home Loan Limited over the Internet.
- Solicit for any purpose which is not expressly approved by India Home Loan Limited management.
- Use India Home Loan Limited logos or materials in any web page or Internet posting unless it has been approved, in advance, by India Home Loan Limited management. Reveal or publicize proprietary or confidential information. Represent personal opinions as those of the company.
- Use software files, images, or other information downloaded from the Internet that has not been released for free public use.
- Use of any Internet software (Instant Messengers, Download tools, Online Music software, etc.) that are not approved by management for use
- Upload or download commercial software in violation of its copyright.
- Make or post indecent remarks like "Flaming" (e.g. malicious written attacks directed at someone) or similar written attacks.
- Download any software or electronic files without reasonable updated virus protection measures in place.
- Intentionally interfere with the normal operation of any India Home Loan Limited Internet gateway.
- Attempt to gain illegal access to remotes systems on the Internet.
- Attempt to inappropriately Telnet to or port scan remote systems on the Internet.
- Establish Internet or other external network connections that could allow non-India Home Loan Limited users to gain access into India Home Loan Limited systems and information assets.
- Spoofing the identity of another user on the Internet or on any India Home Loan Limited communications system is forbidden.

2. Implied restrictions on Internet

- Users using the Company's computers on discovering that they have connected with a web site that contains potentially offensive material should immediately disconnect from that site.
- Users should be aware that India Home Loan Limited accepts no liability for the exposure to

offensive material that they may access via the Internet.

- The ability to connect with a specific web site does not in itself imply that users of India Home Loan Limited systems are permitted to visit that site.

3. Management Review

- At any time and without prior notice, India Home Loan Limited management reserves the right to examine electronic mail messages, files on personal computers, web browser cache files, web browser bookmarks, and other information stored on or passing through the company's computers.
- All transactions done over the Internet will be logged. These transactions will be used for analysis and can be audited.

4. Restrictions on Posting India Home Loan Limited Material

- Users should not place the company's information or material (software, internal memos, etc.) on any publicly accessible Internet computer, which supports anonymous FTP or similar services, unless the Head-IT/CTO has first approved the posting of these materials.

j) Policy Violation and Disciplinary Action

1. Reporting of violation

- All users shall adhere to their security responsibilities as outlined in this document and Security policies and procedures. They are expected to make themselves familiar with the policies, procedures, standards and guidelines that are applicable to them.
- All violations of and policy shall be reported to the Information Security Officer. He shall classify the violation coordinate with appropriate personnel & take necessary on the concerned person.

2. Violation Classification

Violations shall be categorized into three levels as follows:

- **High Severity:** The security violations, which can compromise, the security of critical IT/Non-IT equipment or highly confidential information assets or, to the extent that it can cause devastating impact to the operations of the organization is classified as High server violation.
- **Medium Severity:** The security violations, which can compromise, the security of cities IT/Non-IT equipment or confidential information assets or, to the extent that it can cause significant impact to the operations of the organization is classified as Medium Sever Violation.
- **Low Severity:** The security violations, which can compromise, the security of non-critics IT/Non-IT equipment or private information assets or, to the extent that it can cause nuisance impact to the operations of the organization is classified as Low Severity violation

3. Disciplinary Action

A staggered approach shall be followed in taking disciplinary action against the employee on compliance. Employees may initially be let off with a lighter penalty (e.g., reprimand) till the security culture is established in India Home Loan Limited. Implementation may thus be done in the following there steps:

- Step 1 (1st 6 months): Counseling
- Step 2 (Next 3 months): Verbal Reprimand & Written Memo
- Step 3 (Subsequently): Any of the punitive actions mentioned below

Punitive actions should be laid down for each category of the violation. The punitive action may be decided on case-to-case basis depending on the impact of the violation on the information system

resources of India Home Loan Limited. A few possible punitive actions for each level of violation are listed below:

Severity Category Possible Punitive Action

High Suspension of Service / Termination of Employment / Cancellation of Contract

Medium Severe Reprimand / Suspension of Service

Low Reprimand

Execution Responsibilities

The users of India Home Loan Limited who are using information resources are responsible for implementing these policies and guidelines mentioned in this document.

Section 3: People Processes

3.1 Equal Employment Opportunity Policy

It is the policy of India Home Loan Limited to ensure equal employment opportunity without discrimination or harassment on the basis of race, colour, religion, age, gender, sexual orientation, national origin, citizenship, disability, marital status, pregnancy (including unlawful discrimination on the basis of a legally protected pregnancy/maternity leave), veteran status or any other characteristic protected by law.

Further details are available in the Non-Discrimination and Anti-Harassment Policy, which forms a part of the Code of Conduct.

In addition, the Company expressly prohibits sexual or any other form of harassment of any individuals. If employees have reason to believe that they are being subjected to discriminatory behavior or harassment, he/she should raise the complaint at the earliest opportunity with their immediate Manager or Business Unit Head. The Business Unit Head has the responsibility to investigate any such complaint and to determine what action is appropriate.

3.2 Recruitment Policy

STATEMENT

To ensure that the right talent is selected, a process for recruitment has been designed by the Senior Management. The process is designed to ensure that recruitment is standardized so that a common benchmark is used while recruiting.

APPLICABILITY

This Policy applies to all new hires except Management Trainees, Industrial trainees and temporary staff.

GUIDELINES

This Policy shall be initiated in the following cases:

- a) Manpower planning for the current year
 - b) Vacant position on account of resignation of an employee or on account promotion, etc.
 - c) New position gets created due to change in business environment
 - d) The position requisition form, duly filled, needs to be submitted to the senior management.
- The senior management will help in sourcing of right candidates, through appropriate sources viz. internal job postings/ placement consultants/direct applicants/campus recruitment.

PROCESS

The recruitment process listed below is normally followed for sourcing of Full Time Employees:

a) Pre-Sourcing:

- ☐ Ensure that Job Description is available, shared and agreed upon with concerned Business Unit Head
- ☐ Check if relevant CVs are available within the Company
- ☐ Identify empanelled consultants to commence candidate search
- ☐ Decides if position needs to be advertised for or searched through Job sites

b) Sourcing and Selection

- ☐ Based on the position, different methods of selection may be employed viz. interviews, written tests, grammar tests.
- ☐ Candidates go through a minimum of 2 rounds of interviews with the senior management and the Line Manager.
- ☐ Subject to clearing all rounds of interviews, the candidate is shortlisted for an offer of appointment

c) Pre-Offer Selection Controls

The short listed candidate is put through a series of checks, before an offer is made. These checks enable the organization to ensure that the candidate is fit for the job and has provided authentic information to the organization. These checks include:

i. Reference Check

A minimum of 2 reference checks are made on the prospective employee. These may include previous employers / peers or any other professional reference.

The reference check conCompanies details on candidate's previous role and performance at work, commitment to work, interpersonal behaviour with peers, superiors and subordinates, ability to take initiative and inputs on integrity and accountability issues.

ii. Pre-Employment Health / Medical Check

A candidate who clears the reference check is issued an offer of appointment. The candidate may then be put through a pre-employment health / medical check-up.

Routine medical examination by a medical center to be conducted to establish:

- ☐ General fitness
- ☐ Any contagious diseases

d) Background Verification

An external agency may be appointed by the Company to conduct security checks on the candidate. These include:

- ☐ Education
- ☐ Work Experience
- ☐ India Database Research

- ☐ Indian Criminal Search
- ☐ Banned Persons Database Research

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3.3 Induction

STATEMENT

The policy provides for all employees to be covered by an induction / orientation programme at the time of joining. This helps the employee to get familiar with the organisation's culture, its vision, values and its policies & procedures.

APPLICABILITY

This is applicable to all employees joining across all verticals and across all levels

GUIDELINES

As part of every induction programme, an induction checklist is used to ensure that all new employees receive all relevant information relating to –

- ☐ The organisation
- ☐ Terms and conditions
- ☐ Policies and procedures
- ☐ Training
- ☐ Health & Safety
- ☐ Culture and values
- ☐ Job particulars

Formalities to be completed on an employee joining the Company:

- ☐ Ensure that Reporting Manager sends out a welcome mail
- ☐ Hand over the Induction Docket to the joiner and explain all the key policies and procedures
- ☐ Introduce new joiner to the team

The individual's workstation will be prepared in advance in coordination with the IT and Admin team to enable the employee to commence work.

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3.4 Working Hours/Attendance/Punctuality/Late Working

STATEMENT

The policy advises all employees on the working hours and other rules

APPLICABILITY

Standard Working Hours

The standard working hours are 10:30 a.m. to 6:30 p.m., Monday to Friday and the 2nd Saturday. All other Saturdays the working hours 10:30am to 05:00pm.

of each month being holiday, with one hour for lunch from 1.30 pm to 2.30 pm.

To ensure smooth and efficient running of the Company, employees may be expected to work beyond their normal working hours depending on the demands of their work.

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GUIDELINES

Attendance and Punctuality

a) 15 minutes late punching will be allowed.

- b) Employees coming after 11:00 am will be marked as half day.
- c) Employees coming after 11:00 am to 1:30 pm / 2:00 pm to 5:00 pm will be marked as half day.
- d) 2 late marks and or early left will be considered as half day and three late mark and or early left will be considered as full day leave.
- e) All employees are required to attend office regularly. Any incident of irregularity in attendance will be viewed as a disciplinary issue and will be dealt with appropriately.
- f) All Managers need to maintain an attendance for their respective teams and ensure that attendance of all employees in their team is monitored. All the attendance sheets need to be handed over to Payroll Management by the end of each month.

Punctuality/ Unscheduled attendance

- a) All employees are required to attend office regularly and be punctual in line with the specified work timings.
- b) If an employee establishes a consistent pattern of tardiness/ arriving late, the following corrective action steps will be implemented:
 - ☐ **An employee who remains late on three or more occasions, will be given a verbal warning by his immediate manager.**
 - ☐ **Following such a verbal warning, if the employee still continues to be late, the errant employee is issued a warning letter, a copy of which is included in the personnel file.**
 - ☐ **Subsequent to the above, if the employee shows no improvement, strict disciplinary action up to and including termination will be initiated.**

Absenteeism

- a) Employees who are late or absent from work due to illness or a compelling personal situation must notify their Manager before 10:30 am. When it is impossible to give advance notice due to an emergency, the employee should report to his/her Manager as soon as possible or, at the latest, immediately upon returning to work.
- b) An employee will be considered 'Absent' when he / she does not report on duty without prior intimation or approval.
- c) Such "absenteeism" cases will be treated as "Leave Without Pay" (LWP), unless this is regularized under certain conditions where it has been proved subsequently that reason for absenteeism could not be informed in advance.
- d) Absenteeism will be dealt with in the following manner:
 - ☐ **An employee, who remains 'absent' on two or more occasions, will be given a verbal warning by his immediate manager.**
 - ☐ **Following such a verbal warning, the errant employee is issued a warning letter, a copy of which is included in the personal file. Two such warning letters will lead to strict disciplinary action, up to and including termination.**
 - ☐ **All warning letters will influence annual appraisals / increment / incentive payout.**

Late Working

In the event that employees are required to work significantly beyond normal working hours , i.e. beyond 07:00pm atleast for more than 1hour i.e. upto 08:00pm, the Company will reimburse the costs of meals and travel subject to a maximum of Rs. 250. The relevant Manager must authorize the payment of meal allowances and such allowances will only be reimbursed against proper receipts.

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3.5 Work Attire Policy

STATEMENT

It is management's intent that work attire should complement an environment that reflects an efficient, orderly, and professionally operated organization. This policy is intended to define appropriate "business attire" during normal business operations.

APPLICABILITY

All Full time employees and Trainees

GUIDELINES

- a) Business formal attire should be professional and reflect positively in all interactions and be appropriate for the work situation.
- b) Business formal attire constitute trousers and shirts for men and sarees, trousers, Indian suits, skirts for women
- c) Unacceptable business attire includes, clothing that is worn, torn, revealing, distracting, or generally unprofessional in appearance.
- d) Managers are expected to set a proper example and ensure that employees maintain appropriate appearance. However, they should make reasonable dress policy accommodations to employees who have specific physical or religious requirements.
- e) Any employee who does not meet the dress standards may be counseled suitably by the Manager. Senior Management will take further action if the need arises.

3.6 Probation Policy

STATEMENT

The probationary period allows an employee time to become proficient in the basic responsibilities of a new position and permits the supervisor to assess the individual's performance.

APPLICABILITY

This policy is applicable to all full time employees on joining the organization.

GUIDELINES

- a) All employees are required to serve a probation period of six months from their date of joining the Company.
- b) Towards the end of the 6-month probation period the individual's performance is reviewed and his/her services are conCompanyed.
- c) A confirmation evaluation form needs to be filled by the immediate manager and returned to senior management.
- d) An employee will be deemed to be a conCompanyed employee only once he receives a letter stating the confirmation.
- e) In case of unsatisfactory performance, the probation period is extended, only once, to a maximum period of 3 months. The reasons for an extension of the probation period have to be communicated to the employee and recorded in consultation with senior management.
- f) New Employee will be on a probation period of 6 months from the date of your joining which may be extended at the discretion of the Management. Employee's services in the Company may be conCompanyed in writing on successful completion of the probation period. During the period of probation, services can be terminated by either party by giving one month's notice in writing to the other party. However, the Company reserves the right to terminate the services without giving any notice in writing or otherwise to during such probation period.

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3.7 Performance Management Philosophy

STATEMENT

The Company's Performance Management Process aims to enhance the strengths and to address the development needs of each employee to help them become successful in their careers. The process is conducted annually with active participation expected at all levels.

Performance Management System (PMS) at India Home Loan Limited is a tool to facilitate:

- ☐ **Measurement of individual performance**
- ☐ **Communication**
- ☐ **Development**
- ☐ **Career Enhancement**
- ☐ **Retention**
- ☐ **Succession Planning**

APPLICABILITY

The appraisal cycle is October to September. All permanent employees in the organization who join on or before March 31st, i.e. at least 6 months before the concerned appraisal cycle shall be included in the appraisal process.

GUIDELINES

Performance Evaluation (PE) is a one-time activity carried out during the year which is intended to give the employee feedback of his or her performance during the year from anyone who has come in contact with the employee and can provide valuable insights and information or feedback regarding the 'on-the-job performance' of the employee.

3.8 Compensation Philosophy

STATEMENT

The strategy of the Organization is based on meritocracy and the remuneration policy is designed to encourage high performance culture among employees while aligning itself to the highly competitive business environment. India Home Loan Limited's compensation framework – objective is to align the interests of our employees with the long-term interests of the Company and its stakeholders.

Overview of India Home Loan Limited's Compensation Principles -

- ☐ **Attract and Retain Talent:** Our compensation framework is designed to retain our human capital and reward employees for performance.
- ☐ **Align Compensation with Results:** Employees will be compensated appropriately based on performance of the Business/Company.
- ☐ **Align Employee and The Company's Interests:** Our compensation policies encourage employees to think, act like long-term stakeholders and to advance our partnership culture towards stewardship.
- ☐ **Discourage Excessive or Concentrated Risk Taking:** The risk/return profile of business is taken into account in performance reviews and individual compensation determination.

APPLICABILITY

All full time employees in the organization

GUIDELINES

Salary Payment

Salary is determined and paid in Indian Rupees (INR). Employees will be paid monthly in arrears by credit transfer to their bank account. The salary paid each month represents one-twelfth of the annual rate of salary, less deductions.

Any changes to your bank account or clarifications that you might have regarding your salary or tax liability should be communicated directly to the payroll coordinator.

Discretionary Performance Bonus

Employees may receive an annual discretionary performance bonus. Whether an employee receives a performance bonus in a particular year and the amount of any performance bonus awarded is entirely within the discretion of the company. Any performance bonus will be determined based on factors such as the profitability and performance of the Company and the employee's division, and the employee's performance, conduct and potential. In case of resignation/retirement the bonus pay-out to such employees will be at the sole discretion of the management.

Confidentiality of Compensation Information

Information on any employee's compensation and benefits, including components and monetary amounts, is considered by the Company to be confidential business information. Accordingly, employees are prohibited from disclosing or discussing their compensation information with colleagues (other than the relevant department head or Senior Management) or third parties as well as from asking colleagues about their compensation.

Non-Statutory Deductions

The Company reserves the right to deduct at any time from an employee's salary any sums which the employee owes to the Company, including overpayments of salary or other remuneration, excess leave, outstanding loans or advances, the cost of repairing any damage to Company's property caused by the employee, any loss incurred by the company due to negligence on the part of the employee and any other monies owed by the employee to the Company.

Taxes and Tax Compliant Compensation

The Company manages its tax affairs in compliance with all Indian tax laws and pays all Indian taxes, duties and levies for which it is liable. Employees have a similar responsibility to pay all taxes and duties that are required, both in India and in other countries in which employees have tax liabilities. This means that the full amount of employees' compensation, including pay and allowances, should be reported to the appropriate government authority and the proper amount of taxes withheld and paid.

The Company expects all required tax returns to be filed on time and to accurately reflect the full amount of the employee's taxable compensation.

3.9 Training & Development

STATEMENT

The Training and Development System:

- a) aids performance improvement
- b) acts as an overall professional development program
- c) aids succession planning to help an employee be eligible for a planned change in role in the organization
- d) helps bridge the gap in terms of knowledge/ skill/ competency levels that is required of an employee for a particular position/ role.

APPLICABILITY

All employees in the organization

GUIDELINES

Training Need Analysis (TNA):

- ☐ Performance Management Process
- ☐ Inputs from the employee / Manager

Training Involves:

- ☐ Management development (e.g. coaching and feedback skills)
- ☐ Professional Skills (e.g. presentation, business writing, negotiating)
- ☐ Product training (e.g. credit appraisal, sanctioning process)
- ☐ Core technical skills (e.g. Company orientation, telephone manners, secretarial skills)

Types of Training:

- ☐ Internal Training conducted by subject matter experts within the Company
- ☐ External Training conducted by external consultants, agencies, institutes
- ☐ On the Job Training

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3.10 Promotion Guidelines

STATEMENT

The policy defines the Company's philosophy on promotion & its applicability

APPLICABILITY

All permanent employees in the organization

GUIDELINES

India Home Loan Limited's policy is to promote from within the Company whenever possible. Career advancement will be based on job requirements and individual qualifications.

An employee will be considered for promotion in the following circumstances:

- a) Consistent exemplary performance on the job
- b) Completion of a certain period of time in the existing role
- c) Acquiring competencies suitable and specific to the higher level / specialized job
- d) Creation of a new job requiring specific skill sets available with the employee
- e) Filling a vacancy at a higher level
- f) Any change exercise that is implemented

The Company will prefer to provide opportunities to employees within the organization, prior to sourcing talent externally. The Reporting / Function Head will appraise the individual's performance after

discussing the same with the employee. A decision on the promotion will be based on the appraisal feedback received from the Reporting / Function Head and the willingness demonstrated by the employee to take up the new responsibility. The Management reserves the right to modify performance criteria at its discretion.

3.11 Disciplinary Policy

STATEMENT

The policy defines the Company's philosophy on open communication and allows free and informal discussion of any problems relating to work. The company would resolve employee grievances between the parties involved and handle problems satisfactorily through a formal procedure.

APPLICABILITY

All employees in the organization

GUIDELINES

Cases of unsatisfactory job performance or attendance, misconduct or gross misconduct will be dealt with according to the procedure set out below. The procedure is designed to ensure that all staff is dealt with fairly in such cases. However, it does not form part of the contract of employment or otherwise have contractual effect.

The Company reserves the right to suspend an employee on full pay and benefits in the case of any investigation of disciplinary procedure being implemented. Depending on the seriousness of the situation, the Company may decide to omit stages 1 and 2.

Disciplinary Procedure

Stage 1 – Issue Identification:

The issue is brought to management's notice by the immediate Reporting Manager or any other employee that is affected by the concerned staff member.

Stage 2 – Verbal / Informal Warning:

An interview will be arranged between the employee and immediate Manager within a week to discuss the problem and establish a timescale for improvement. A member of the senior management may be present at the meeting. A note of the warning will be placed on the employee's personal file.

Stage 3 - Formal Written Warning:

In case of recurrence of the act, a further disciplinary meeting will be held at which a formal warning will be given in writing or by email, stating that any further misconduct or continued failure to improve performance will render the employee liable to termination.

Stage 4 - Notice of Termination:

In the event that the employee has been issued two formal written warnings in the past, and was unable to provide satisfactory explanation, a notice of termination will be given in writing. Management reserves the right to accept / reject the explanation provided by the employee.

A staff member from the senior management will be present at all stages and will place a full report in the employee personal file.

The below table outlines the time period for resolution / taking action at each stage:

Stage Timeline for resolution / action

Stage 1 Day 1

Stage 2 Within 7 days of completion of Stage 1

Stage 3 Within 14 days of completion of Stage 2

Stage 4 Within 14 / 21 days of completion of Stage 3

Examples of unsatisfactory performance and misconduct include –

- a) Repeated late coming;
- b) Unauthorised or unexplained absence;
- c) Failure to follow established departmental or working rules and procedures;
- d) Failure to comply with sickness notification and certification procedures;
- e) Errors in the performance of duties or slow work;
- f) Unsatisfactory attitude or lack of co-operation;
- g) Being a disruptive or unsettling influence on other employees.
- h) Violation of the Code of Conduct or any such guidelines lay down by the Company

The above list is only illustrative and should not be considered as exhaustive.

Termination without Notice

In cases of gross misconduct or gross incompetence, any or all of the above stages may be omitted and the employee will be liable to immediate termination without notice.

Examples of gross misconduct include -

- a) Theft, violence or breach of confidentiality;
- b) A criminal offence related to your work, falsifying company records or expense claims;
- c) A criminal offence outside work which may adversely affect the Company's reputation or reflect upon your suitability for your job, or which affects your acceptability to other employees;
- d) Disloyal conduct;
- e) Any act which could severely affect the Company's reputation.

Gross incompetence refers to performance at work which could severely affect the Company's reputation or where minimum standards required by the Company are not being achieved. Termination for breach of compliance procedures may also result in notification to the appropriate regulatory body.

At each stage of the procedure (including dismissal without notice for gross misconduct/incompetence) you will be given an opportunity to explain your behaviour, and you may bring a representative of your choice to the meeting, provided that the representative is an employee of the Company.

Protection against victimization

An employee may appeal at any of the above stages and if he/she wishes to appeal, he/she should notify the senior management in writing as soon as practicable after the relevant decision. The appeal will be heard by the relevant Departmental or Divisional Head as soon as practicable. His or her decision will be final.

It is important to note that any disciplinary action against an employee will be as per the provisions of employment laws prevalent from time to time.

The Company may vary the procedure for improvement where it is necessary to deal with a particular case in a different way.

3.12 Grievance Handling Policy

STATEMENT

- ☐ To create an environment that promotes open communication and allows free and informal discussion of any problems relating to work.
- ☐ To resolve employee grievances between the parties involved and handle problems satisfactorily through a formal procedure.

APPLICABILITY

All employees in the organization

GUIDELINES

- a) If you have a grievance relating to your employment with the Company you should initially discuss this with your Manager. The Company encourages an open and honest relationship between management and staff and it is hoped that most grievances can be resolved in this way.
- b) Where this is not the case, you may refer the issue to your department head, who will involve the senior management as well.
- c) If the grievance is still unresolved, discretion ultimately rests with the relevant Business / Function Head and the senior management.
- d) Once the issue has been resolved, no further reference will be made to the grievance, and no employee will be discriminated against, for raising it.

The Company's open style of management encourages the airing of grievances and their swift resolution in an informal manner. The senior management will facilitate the formal / informal resolution of all matters of serious concern to the organization and the employees. However, it is important that wherever informal resolution is not possible, then a formal grievance procedure exists to resolve serious grievances quickly. Organization follows deadline of 7 days to resolve any grievances.

Employees are encouraged to contact the senior management regarding any issue they want resolved. The senior management will co-ordinate and ensures that the matters are resolved at the earliest and that the management does not overlook any matter of concern.

In case there is any problem, personal or professional for which you need any assistance you must contact your immediate manager. You are also encouraged to bring up any problem beyond routine problem that affects you or the Company to the notice.

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3.13 Exit Policy

STATEMENT

The policy provides for a smooth exit of an employee from the organization. It helps improve existing processes and the work environment by understanding the reasons for employee attrition.

APPLICABILITY

This policy is applicable to all employees, who are leaving the organization.

PROVISION

- a) Employees leaving the Company needs to complete all the formalities as included in the exit email sent by the Company and submit the forms before the last working day.
- b) The exit interview must be an objective process with a view to understanding the root cause for the attrition. Feedback from the employee is considered confidential and used for translating the same into a process improvement opportunity.
- c) The employee is required to handover all organization property (viz. Access cards, laptops, training material etc.) before his/her last working day.
- d) The employee is required to complete a clearance form from all the respective departments (Controllers, Administration, Operations, and Compliance) on/before the last working day. A relieving letter is issued only on receipt of these forms.
- e) Full and final settlement will be done in the same month of your last working date and the payment is made in the first week of the subsequent month if the last working date is on/before 15th of the

month. In cases where the last working date is after 15th, the settlement will be done in the subsequent payroll cycle.

GUIDELINES

Employment may be terminated by the employee or the Company. Entitlements as an employee shall immediately cease upon any of the following situations:

- a) Retirement
- b) Voluntary resignation accepted by the Company
- c) Non-disciplinary dismissal by the Company disciplinary dismissal and
- d) Expiration of employment contract for employees who are hired on a fixed term basis
- e) Death

a) Retirement

Normal retirement age is 60. An employee shall retire on the last day of the month in which he/she reaches the retirement age.

b) Voluntary Resignation

- i. Employees, who choose to resign, need to submit their resignation in writing to their immediate manager with a copy to senior management.
- ii. The Reporting Manager needs to necessarily sign the resignation and forward the same to senior management. On receipt of the resignation letter, the senior management is to inform relevant departments viz. Controllers, Administration, Compliance of the same.
- iii. Resigning employees are required to serve a notice period as per the termination clause in their appointment letter or 3 months, whichever is higher, so as to complete assigned duties and allow the organization to make alternative arrangements.
- iv. The organization reserves the right to pay /recover salary in lieu of notice period/ adjust notice pay in lieu of notice period or agree to relieve an employee early.

c) Non-disciplinary Dismissal

Employment may be terminated by the Company in any of the following situations:

- i. The Company ceases to do business or transfers ownership of its business;
- ii. The Company has an operating loss or business contraction;
- iii. The Company changes the nature of its business and has no suitable work to assign the Employee;
- iv. The Company stops work for one month or more because of a force majeure event;
- v. The Company has conCompanyed that the employee is incompetent for his/her job duties;
- vi. There is a judicial determination that the employee is bankrupt or otherwise incompetent or partially incompetent to perform his/her duties.

d) Expiration of employment contract

Employees leaving the company need to fill in an exit interview form and complete the exit formalities as laid by the management before the last working day. A service certificate will be issued to the employee

e) Death

Management will get in touch with the legal heirs / family of the deceased employee and ensure completion of all exit formalities

Obligations during the Notice Period

During any notice period, the Company reserves the right to require employees to attend work to complete projects and assist in handing over their responsibilities or to remain at home on gardening leave or for a cooling off period. Employees may, with the approval of their immediate Manager, take up to 10 days of earned leave during this period.

During the notice period, the Company shall continue to maintain salary and other benefits. However, the employee may not commence employment with any other company during this period.

Confidential Information and Non-Solicitation Clause

In line with the Company's policies, on termination of your employment with the Company for any reason whatsoever you shall sign such documents/ letters which the Company may require you to sign so as to safeguard the intellectual property of the Company; to ensure that you continue to abide by the confidentiality clause contained in this letter of appointment and in the Code of Conduct and also to ensure that on leaving the employment with the Company you shall not for a period of 2 years make attempts or endeavour to directly or indirectly encourage/assist/solicit other employees to join you in your new assignment or any other employment.

Definition of Confidential Information

"Confidential information" is information that is not generally known to the public about the Company, its clients, its counterparties or other parties with which the Company has a relationship. Like proprietary information, confidential information may be present in various media and forms.

Examples of confidential information concerning the Company; its employees, clients and counterparties include, but are not limited to:

- ☐ personal information;
- ☐ financial information;
- ☐ business plans or projections;
- ☐ acquisition or divestiture plans;
- ☐ securities issuance, buy-back or tender plans;
- ☐ restructuring or reorganisation plans;
- ☐ legally earned communications and materials;
- ☐ identities of clients or counterparties of the Company;
- ☐ existence and terms of agreements with clients or counterparties; or
- ☐ programs and materials on the Company's information systems

Confidential information also may concern individuals or entities that are not clients or counterparties.

An employee should treat as confidential any non-public information about individuals, companies or transactions if:

- ☐ it has not been publicly disseminated; and
- ☐ it has been acquired directly or indirectly from an individual or company involved in an actual or potential transaction or a business relationship in which the Company may have a role, or anyone acting on behalf of the foregoing.

Notwithstanding anything contained in this handbook elsewhere or in the letter of appointment the Company reserves its right to take such legal action against the employee as it may deem fit in case you breach any conditions contained in this clause.

Full and Final Settlement

An employee's final salary will be calculated by dividing the employee's annual base salary by 365 working days and multiplying by the number of working days from the beginning of the month to the last day on payroll. In addition eligible employees will receive the Gratuity payment as per the policy. The final payments to which an employee is entitled will be paid directly by cheque or bank transfer as soon as possible after the employee's last day on payroll. Any final balances owed to the Company at the

date of leaving, including loans, adjustments for excess leave taken and any outstanding debts will be deducted from the employee's final pay and any remaining balances will be due immediately. In this regard, it is the employee's responsibility to ensure that all reimbursable expenses are submitted and that corporate card accounts and cash advances are cleared.

Please note that the Company may withhold final payments in order to ensure tax liability, if any, has been settled.

3.14 Retirement Age Policy

STATEMENT

All employees of the Company will retire on completion of 60 years of age. An employee due to retire will be given one month's notice in writing informing him/her about retirement.

ELIGIBILITY

This policy is applicable to all employees

PROVISION

The Company will record the date of birth for employee at the time of employment, based on the proof of age certificate and shall be accepted by the Company to be final and cannot be changed except when the Company is convinced about the validity of such request.

All employees, who attain the age of 60, will retire in the respective month.

The employees can continue with the services of the Company as a consultant post retirement.

Proof of Date of Birth/ Age

- ☐ The Company will accept any one of the following as the proof of age or date of birth confirmation:
- ☐ Birth certificate by the municipal or equivalent authority
- ☐ School leaving certificate
- ☐ Passport
- ☐ Ration Card
- ☐ Aadhar Card

Extension of Service

The Company may give extension to employees who are critical to the business at its sole discretion.

In some cases the Company may offer a contractual engagement at its sole discretion.

The Management will approve all requests for extension of retirement in writing.

SECTION 4: People Benefits

4.1 Leave Policy

STATEMENT

We recognise Leave as a benefit that will enable employees to take time off from work for rest, recuperation and personal emergencies. The purpose of the leave policy is to plan and avail leave in a systematic way.

ELIGIBILITY

This policy is applicable to all employees, from the date of joining. Limits and exceptions are as stated below.

PROVISION

- a) All annual leave entitlement will be computed based on 1st April to 31st March cycle and will be credited to an employee's leave account on an annual basis.
- b) For employees who join in the middle of the leave year, eligibility would be calculated on a pro-rated basis.
- c) The concerned employee must apply for leave and get the leave sanction by the immediate supervisor.
- d) All employees need to plan their leave for the year ahead in conjunction with their manager. All leave has to be intimated in advance (except during emergencies) such that it does not affect day-to-day work.
- e) Any leave taken without prior intimation and / or approval will be treated as Leave Without Pay (LWP), even if the employee has leave to his credit. Such leave will be treated as Unauthorised Absence (UA), if leave taken is not regularised by the immediate manager and it has been proved subsequently that reason for absenteeism could have been informed in advance.
- f) Employees on probation cannot avail of any leave, during the probationary period except in case of emergencies.
- g) Employees serving notice period can take up to 10 days of earned leave. The 10 days include sick leave as well.
- h) Employees need to apply beforehand for all types of leave to their immediate supervisor.
- i) No employee shall be permitted to take continuous 21 days leave inclusive of Sundays/ weekly holidays/ other notified holidays.

CATEGORIES OF LEAVE – POLICY GUIDELINES

Earned Leave (EL)

- a) Full-time employees are eligible for annual paid leave (working days per calendar year) for 18 working days
- b) Employees on probation are not entitled to avail EL. On confirmation, they can avail leave, from the EL accumulated from the date of joining.
- c) EL is calculated on a pro rata basis from the date of joining.
- d) Holidays or weekly offs are not included in the calculation of EL even if they fall in between the period of leave.
- e) Annual leave should be taken within the April to March cycle. However, due to certain reasons, if an employee is not able to do so; the leave can be carried forward to December end in the succeeding year, post which it will lapse. The Company will not provide compensation in lieu of unused annual leave.
- f) There is no provision for encashment of unconsumed EL. All EL in balance will lapse after December month of succeeding year.
- g) Employees may make an application to their immediate manager in advance and must obtain approval before proceeding on leave.

Sick Leave (SL)

- a) The Company provides paid 6 sick leave in a year for benefits to all employees for periods of temporary absence due to illness or injury. Sick leave can neither be accumulated nor carried forward nor can it be encashed at any point.
- b) Holidays or weekly offs are not included in the calculation of SL even if they fall in between the period of leave.
- d) For any SL beyond 3 consecutive working days for medical reasons, a certificate issued by a registered medical practitioner must support the leave application.

- e) Routine medical / dental appointments should be made during non-working hours when possible. If appointments are scheduled during work hours, Managerial approval is necessary.
- f) In case of frequent and /or extended illness (regular sick leave on a monthly basis or seven days continuous), you may be asked to have a medical examination by a Company's designated doctor.
- g) Employees will not be allowed to combine their sick leave with annual leave. If an employee falls sick within seven days after his/her annual leave, the sick leave taken will be treated as annual leave.
- h) The above sick leave benefits are provided for employees with legitimate health issues and must not be abused or misused. If the Company observes a pattern of absence or an excessive number of absences, inquiries will be made. Any abuse or misuse of sick leave benefits will be subject to appropriate disciplinary action.
- i) Sick leaves exceeding 9 days in a leave year should be approved by the Business Unit Head. Such leaves will be approved under exceptional circumstances such as hospitalization of employees and considered as Medical Care Leave.

Maternity Leave (ML)

- a) Enables female employees to take time off from work for the purpose of childbirth and postnatal care, and to recuperate from miscarriage. ML would not be treated as break-of-service and all benefits due in the normal course would be payable.
- b) All female employees who have put in 6 months of service in the organization can avail of this leave when required.
- c) Fully paid leave is granted for a 3 calendar months for the first 2 children only from the date of the start of the leave.
- d) It is expected that all eligible employees avail such leave 6 weeks prior to the expected date of delivery and 6 weeks after the delivery, unless the medical practitioner attending to the employee recommends lesser absence from work prior to the delivery. Applications for maternity leave should be made at least 2 months in advance. A certificate issued by a registered medical practitioner indicating the likely date of delivery must duly support the application.
- e) In case of miscarriage and / or tubectomy operations, the employee can take leave up to a maximum of 6 weeks from the date of the incident.
- f) In case of a premature delivery and if the employee is still at work and has not started maternity leave, the 12 weeks of leave starts from the date of delivery.

Sick Leave pre or post Maternity

Women employees, who are advised complete bed-rest prior to Maternity, will be eligible to avail a maximum of 30 days of Sick Leave. This will be addition to the Maternity Leave as per policy. This sick leave, in addition to the Maternity leave, will be at the sole discretion of the Management. Any additional Leave will be treated as Leave without Pay.

Other Leave

- a) Paternity Leave (PTL) - All male employees can take 5 working days paid leave on the birth of their child.
- b) Marriage Leave to all confirmed employees will be entitled to 5 working days paid marriage leave in addition to normal annual leave. This leave should be taken within three months of the legally recognized marriage date.
- c) Compassionate leave - All employees are entitled to 3 days of paid leave within 15 days of the death of any of the following - spouse, parents, siblings, children, grandparents and parents-in-law.
- d) Public Holidays – All employees are entitled to 13 public holidays based on the list of holidays released by the management at the beginning of each Calendar year. (This list is dependent on the holiday list published by Banks and Stock Exchanges)
- e) If the public holiday falls during your annual leave, that day does not count as a leave day.
- f) In addition to the observed holidays, employees may use Earned Leave for observing religious,

cultural and political holidays not observed by the Company.

Leaves during Notice Period

An employee needs to serve the complete notice period. An employee can take only 10 pending earned leaves during the notice period with prior approval from immediate Manager. Based on the discretion of the management, upon resignation an employee may be asked to leave with immediate effect and may not need to serve the notice period.

The Company shall have absolute discretion in the adjustment of notice period against the employee's earned leave and waiving off the notice period.

Leave Without Pay (LWP)

In case, an employee has exhausted his entitlement of leave for the entire year and needs to avail of additional leave to cater to some emergencies, he/ she can avail of leave as Leave without Pay (LWP).

This is only subject to approval from the Manager and will be approved only in case of emergencies.

Salary will be deducted on a per-day basis as Gross Annual Fixed Salary divided by 365 multiplied by the number of days of LWP.

Comp off – if an employee works on Holiday or non-working day, then he/she is eligible for comp off, which can utilize with prior intimation in 60 days. After 60 days the comp off will be lapsed and will not be available for utilization.

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4.2 Provident Fund Benefit

STATEMENT

The policy provides for the benefits under the Employees Provident Fund & Miscellaneous Provisions Act, 1952. It provides social security benefit to all permanent employees.

ELIGIBILITY

This policy is applicable to all employees, from the date of joining.

PROVISION

The Company is a member of the Regional Provident Fund, as required by the Indian law.

The Provident Fund deductions will be as per the Employees Provident Fund & Miscellaneous Provisions Act, 1952.

Employees can also make voluntary contribution to the Fund. For more details, employees may contact the payroll coordinator.

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4.3 Gratuity Benefit

STATEMENT

The organization is covered under the Payment of Gratuity Act, 1972, to reward the employees, who have to their credit, a long and continuous service term with the organization.

ELIGIBILITY

All employees as defined by statute will be eligible for gratuity on retirement or resignation after completion of 5 years of continuous service. (Continuous service means “uninterrupted service, including service which may be interrupted on account of sickness, accident, leave).

The minimum 5-year service rule is not applicable in case of death or disablement.

Gratuity is also paid on death due to accident or disease, while in service, to the pre-appointed nominee as per statute.

PROVISION

☐ Employees will be entitled to payment of gratuity on fulfillment of the eligibility criteria mentioned above

☐ Gratuity payable to an employee will be calculated at 15 days basic salary for every completed year of service based on the last drawn basic salary.

☐ All new employees will have to fill in a form appointing a nominee and submit the same to the Company.

□ Gratuity will be paid along with the full and final settlement either to the employee or to the nominee as the case demands.

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4.4 Transfer Policy

STATEMENT

The policy provides for relocation assistance to employees who are joining the organization from other locations and provide support to employees for a certain period of time till the employee settles in the new environment.

ELIGIBILITY

Employees / New Hires who are transferred to / join from other locations in India

PROVISION

For transfers within the same city a transfer letter will be issued to the employee and management will ensure completion of all other formalities.

For inter-city transfers the organization reimburses relocation cost as under:

Accommodation

The employee and his family will be provided with stay in hotels approved by the organization to help the employee finalize his/her accommodation at the new location prior to the joining date.

Accommodation will be provided for a maximum of 15 days. The organization will only cover expenses incurred only on stay and breakfast for the stipulated time. The employee will have to bear the cost of any additional expenses such as laundry, meals, personal telephone calls etc.

Transit Expenses

All transit expenses on packing, transportation and unpacking of the household goods of the employee by the shortest route will be paid on actuals subject to production of bills. This includes a maximum of one truckload/ container of goods and transfer of one personal vehicle if any.

The employee needs to use the services of organization-empanelled agencies for relocation purposes. Quotations from at least two agencies will be procured and the lowest quotation submitted to the MD for approval.

Mode of Travel

There will be a one-time expense reimbursement of economy class airfare/up to 2nd AC by rail for employee and his family. Family includes spouse and dependent children of the employee. The employee can also claim reimbursement of the taxi fare from his/her residence to the airport/ railway station and from the airport / railway station to the hotel or residence as the case may be. All other travel expenses at any point of time will be borne by the employee.

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4.5 Miscellaneous

Office Rules

All enquiries concerning employees, such as requests for addresses, telephone numbers or references, should always be referred to management. For security reasons, such information may not be given out by another department or employee.

Employees are requested not to leave valuables and other personal effects in the cloakroom or leave them openly visible at work stations. The Company cannot be held responsible for any losses.

Other Company Policies

Employees are required to be familiar with and comply with all other Company policies (including compliance notices) published by the Company from time to time.

Visiting Cards

All full time employees may request for official visiting cards on need basis.

The designations featured on the visiting cards will be the same as on the appointment letters / Appraisal letters.

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