JOINING EXCELENCIA

TALENT ACQUISITION

- What is the pre & post talent acquisition process?
 Our Talent Acquisition team shall conduct tests under various categories for selected candidates before being called for the final interview.
- **Does EXCELENCIA have an Associate verification process?** Yes.

ONBOARDING & INDUCTION PROCESS

The onboarding and induction processes are designed to orient the new team member about the Company in a professional manner. The PX team shall schedule their work in a way that they are able to spend time with the new team member on the first day of work.

What is the onboarding process?

The onboarding process includes action taken by teams within the Company to transition the new hire into the Company. The following is a list of responsibilities that form part of the onboarding process and people/teams responsible for completing them.

a. Pre-Joining Formalities

Steps	Action	Responsibility
1	Share/Send appointment letter with tentative date of joining, to candidate for acceptance. Face-to-face meeting is encouraged.	PX Team
2	Accept/reject offer & communicate the same.	Candidate
3	Provide candidate joining information to Tower Head, PX, IT & Admin	PX Team
4	Prepare joining kit before date of joining	PX Team
5	Desktop/Laptop to be kept ready	IT Team

Joining Kit includes the following – 1) Company branded joining memento & diary, 2) stationary, 3) candidate resume with evaluation form, 4) Associate Evaluation Form, 5) Associate PF Form, 6) ESI nomination form (if applicable), 7) background verification form (if applicable), 8) Ask-PX Handbook, 9) NDA & Confidentiality Agreement, 10) Agreement Regarding Disclosure of Confidential and Personally Identifiable Information, & 11) Security Responsibility Agreement.

b. Joining Formalities

Steps	Action	Responsibility
1	Guide candidate to PX team for joining formalities	PX Team
2	Welcome new Associate	PX Team
3	Provide joining kit	PX Team
4	Guide new Associate in filling-out forms	PX Team
5	Fill & submit forms along with other documents	New Associate
6	Collect forms & necessary documents & update personal file	PX Team
7	Verify Associate information	PX Team
8	Provide hard copy of offer & appointment letter	PX Team
9	Escort new Associate for handover to Tower Head	PX Team

c. Post-Joining Formalities

Steps	Action	Responsibility
1	Check if Associate has submitted all documents	PX Team
2	Follow up with Associate in case of non-submission of documents	PX Team
3	File all documents in Associate file & send details to Finance team	PX Team
4	Background Verification process to be initiated	PX Team

What is the Background Verification Process?

- Background verification process at Excelencia consists of
 - Verification of educational background starting from SSLC to PG
 - Verification of previous employment (to the maximum of last three employers)
 - Verification at both present and permanent address
- In case of any discrepancy during the process of background verification or with the BGV report, then the same will be discussed with the respective Associate for clarification.
- o Based on the clarification received, the BGV process will be reinitiated
- o In case of a non-rectifiable discrepancy then it will be escalated to the senior management and their decision will be final.

What is the induction program?

The PX function shall share the *iBelong* induction program for new team members. The schedule is divided into the following sections: General and Technical.

a. General

- Joining Formalities
- Organization and Work Culture
- > Compensation Benefits

b. Technical

- Service Offerings
- > Technology Verticals

EMPLOYMENT POLICY

• What are general employment terms & conditions of the organization? The general employment terms and conditions are covered under your employment contract. The employment contract includes the following:

- a. Appointment Letter and amendment letters from time to time.
- b. Non-Disclosure Agreement.
- c. Associate Handbook and any other policies applicable.

PROBATION & CONFIRMATION

All new Associates are hired with the intention of permanent placement unless stated otherwise in the appointment letter. Before the completion of the probationary period, new Associates will undergo a performance appraisal as outlined below.

• Do I have to undergo probation?

All recruits, with or without prior experience, will undergo a six (06) month probationary period. We believe that you will out-perform the expectations set.

Unless otherwise communicated in writing at the end of your probation period, we will treat you as a confirmed Associate. However, if your performance during your probationary period is not up to the standards, your manager will address the issue with the concerned BU Head which may result in an extension of your probation period or termination of employment.

• What are the reasons for probation?

As a recruit, you will need time to get to know your office atmosphere. The probationary period will enable us to assess your performance so that a mutually convenient plan of action can be developed.

• What is the probation process?

Your manager and you will agree on the date for a performance review meeting. The performance review meeting in the case of all probationary period reviews is done before the completion of six (06) months of service. Your manager will prepare a written performance appraisal in the approved format and provide this to you at least forty-eight (48) hours before the meeting. Your manager and you will meet and agree to any objectives for the next appraisal period.

ASSOCIATE ORIENTATION PROGRAM

• What happens after I am hired?

There will be an orientation program where your PX colleague will give you a brief history of the Company and the organizational design. You will be introduced to your colleagues and shown your workspace. The Company will provide new e-mail ID, identity card, and business cards as applicable. The stationery and other requirements shall also be provided.

We encourage you to participate actively in the various activities and to use all available facilities for an enjoyable experience at EXCELENCIA.

What are the Company's expectations from you?

Our organization is committed to high standards of business ethics and personal integrity.

We expect the following from you:

- a. Business Etiquette
- b. Awareness of Business Communication
- c. Time Management
- d. Customer Interaction Essentials
- e. PX Tech Systems

Is there an online system available to assist with my work-related requests?

We provide a technical tool called Associate Self-Service Portal (ESS) to enable a faster and accurate way of interfacing with PX function for all PX requirements. Individual login ids will be created on the first day of employment, and you will receive access. You are required to update all your personal information in the ESS system. Attendance, leave, travel, performance goals & learning records will be stored and managed using the ESS. You may access the local network to read and understand policies and work environment.

ASSOCIATE REFERRAL

We understand the importance of hiring the right talent and realize that identifying top talent needs great effort. We believe that you, our current Associate, can be thebest source for finding and recruiting the right talent. You can help us in making our talent search easier.

Who is eligible for Associate Referrals?

All permanent Associates will be eligible for the Associate referral scheme, except for the hiring manager.

Who can I refer?

You can refer any person whom you feel will suit the job requirement. The selection processes will be the same as the standard hiring process.

What are the details of the referral award?

Award is as follows for the position filled:

Years of Experience	Role	Referral reward
1 – 6 Years	Developer	Rs. 7000/-
7 – 12 Years	Lead	Rs. 10,000/-
12+ Years	Above Lead Positions	Rs. 15,000/-

• When will I receive my referral award?

To receive your referral award, the candidate should be an active Associate (notice period not covered) for three (03) months from the date of joining the organization. If more than one Associate refers the same candidate, Talent Acquisition team will have the final say in deciding on the primary source of the CV based on the facts and the data available.

How do I refer a prospective candidate to the Company?

Whenever a new position is available, it shall be announced through an Internal Job Posting (IJP). Positions are then open for the Associate Referral Scheme (ERS). To refer a prospective candidate under ERS. you must get the consent of the potential candidate and send his/her complete resume with e-mail and mobile phone details to the Talent Acquisition team.

ETHICS & CODE OF CONDUCT

WORK HOURS, WORK TIMINGS & ATTENDANCE

• What are my expected hours of work?

The general shift business hours are from 09:30 AM to 06:30 PM. However, the work hours will be re-structured based on location and business requirements. Your Business Unit Head (BU Head) will communicate the information about your shift timing. You are expected to complete your work within the stipulated work hours. However, depending on the exigencies you will be required to work a few hours beyond the office timings. An annual holiday list will be published according to statutory requirements. Weekly off shall be on all Saturdays and Sundays for all except for Delivery Support Team. The Delivery Support Team will avail weekly off

as informed by the BU Head.

Associates must clock-in nine (09) hours in a day, including break time of one (01) hour. Timesheet for eight (08) hours must be filled-in each day in the tool, without fail.

What is the attendance recording practice at the Company?

The Biometric Attendance System will record the time you enter and leave the office. In case of a failure in biometric recording, the same shall be communicated to your Manager. However, wherever the Biometric Attendance System does not exist, you will need to sign a manual attendance register available at your function. An extract of the attendance register will be sent for payroll processing every month. Please note that this is a confidential report and any tampering with the information will lead to disciplinary action, up to and including termination. The Managers can update the timings.

What happens if I am late to office?

Our Associates are considered self-disciplined and expected to be on time to work. If you are delayed or leave the office early for personal work, please ensure that you have taken approval from your manager and that he/she is aware of your whereabouts or has your contact details.

• Is there a grace time and loss of pay (LOP) for daily attendance and in-time?

Grace period of fifteen (15) minutes is allowed for a maximum of three (03) times a month, beyond which half day gross salary shall be deducted for each late coming.

• Is there an option of flexible working hours at EXCELENCIA?

There is no policy in place to work on flexible timings. It is possible to flex hours according to need with the approval of the BU head/PX function. We ensure that our Associates have a perfect work-life balance and act according to the need of the hour and on a case-by-case basis.

WORKING FROM HOME

While the Company does not encourage you to work from home, it understands that for various reasons, you may perform some of your duties from home on certain days. The Company is committed to agreeing to a flexible working environment, provided that the needs and objectives of both the Company and you can be met.

• What does work from home constitute?

Working from home means performance of Company's work for stipulated hours from your home. This arrangement is based on the philosophy of trust and mutual benefit.

Working from home -

- a. is voluntary and is not intended to create a situation where you feel obliged to work excessive hours.
- b. should not create additional workload on other Associates or otherwise affect operational efficiency and effectiveness.
- c. is not your right under the employment contract; and
- d. will be considered on a case-by-case basis only.

When you decide to work from home, consideration must be given to the nature of work to be performed at home, the facilities at home for maintaining a smooth working environment, the effect on co-workers and clients, and whether service- delivery is affected.

Reasons for availing work from home include:

- a. Inclement weather
- b. Natural calamities
- c. Communal unrest
- d. Unavailability of public transport due to strike/bandh
- e. Extreme medical incapability to travel to work, etc.

• What are the guidelines regarding working from home?

- a. Prior to availing work from home, you must assess whether the work can be performed productively from home. If you have managerial responsibilities, work from home option may be unsuitable because of the need to promote cooperative and collaborative working relationships amongst your team members. You must be able to work as efficiently and effectively while availing work from home as you would when you are at the workplace. You must ensure that there is no loss in productivity or quality of deliverables while working from home and must continue to be accountable for the work assigned.
- b. You must ensure that you are always reachable on phone while working from home.
- c. You shall adhere to the agreed work timings of the project(s) you are involved in. Any deviation shall require a written consent from the Delivery Head.
- d. The Delivery Head shall consider the following before granting work from home:
 - > Need for closer interaction with Associates.
 - Requirement for meetings/trainings.
 - Facilities to work at the Associate's home or alternate place of work (for example: internet connectivity, bandwidth).
 - > Any equipment or software that cannot be installed/use at home; and
 - > Data privacy, regulatory or contractual constraints from client as per law or contract.
- e. Working from home for reasons such as family functions, special occasions, etc., is not allowed. For these, you must avail leave allotted to you.
- f. In case you avail work from home, you must log-in for at least eight (08) productive hours. You must maintain timesheets and record details of tasks performed. The Manager should validate and approve the time sheets.
- g. You can avail work from home for a maximum of twelve (12) days in a year i.e., one (01) day per calendar month. This cannot be clubbed with a holiday, week-off, or with the previous month's un-availed work from home time.
- h. You need to obtain approval for working from home in advance from the Delivery Head. Grant of such option shall be at the sole discretion of Delivery Head. Therefore, prior to application in ESS, you are required to obtain an email approval from the appropriate authority. Any unapproved work from home shall be considered as casual leave.
- *i.* You must state specific reasons while applying for work from home. You should recognize that while working from home may be required at times, it is not

considered a suitable option. Therefore, working from home should be availed only in exceptional circumstances.

j. You agree to abide by the intellectual property and data protection obligations entered by you at the time of joining the Company. You understand that there is a zero-tolerance policy in case of violation of any of these obligations.

DRESS CODE & GROOMING

The Company has adopted Smart Business Casuals on all days for all Associates while at work. The policy intends to create a comfortable work environment that is also professional and free from distractions. Associates should maintain appropriate and commonly accepted standards of dressing and grooming that always reflects a professional and business-like image.

What are the guidelines for formal dress?

The general principle for adopting smart business casual wear is related to creating a positive image of the Company for our customers and colleagues.

Keep in mind that:

- a. You are always the ambassadors of the Company.
- b. Clothes should not cause embarrassment or have a negative impact on the image of the Company.
- c. If you are representing the Company off-site with third-party companies, you should wear business formals.

How is the rule applied?

All full-time, part-time, temporary & agency contractors must always abide by this policy in the workplace. The Company recognizes the diversity of its Associates and will take a sensitive approach when this affects their dress code.

Note: No Sandals, Flip Flops/Slip-On, Sneakers Sandals & Floaters from Monday to Friday.

Please remember that these are general guidelines and do not include every appropriate or inappropriate item. The Company believes you will exercise good judgment. In the workplace, it is critical that our choices reflect our commitment to our values, Company Code of Conduct, and our commitment to one another and our customers.

What are the requirements related to grooming?

Clothing must be neat and clean, free of excessive wrinkles, tears or worn areas, and hemmed. Hair and nails should be clean and groomed as appropriate.

What are the consequences for non-compliance?

We are confident that you will use your best judgment when maintaining appropriate attire and appearance. Management reserves the right to determine appropriateness. An Associate whose attire is not consistent with these guidelines may be cautioned to pay closer attention to their choice of clothes or in severe

cases may be sent home to change clothes. If an Associate is warned regarding unacceptable attire and sent home three (03) times, a written warning will be issued and placed on file. Continued disregard of the policy may be cause for further disciplinary action, up to and including termination.

REST & MEAL PERIOD

Associates will have a maximum break period of one (01) hour.

PERSONAL HYGIENE

It is mandatory that you maintain high standards of personal hygiene and expect a non-offensive and non-allergenic work environment.

PERSONAL COMMUNICATION (MOBILE, EMAIL, INTERNET & SOCIAL MEDIA)

What are the guidelines related to phone calls?

Personal communication is inevitable and sometimes necessary. It is expected this will remain at appropriate or reasonable levels.

What are the guidelines related to emails?

Email has legal status as a document and is accepted as evidence in the court of law. Even when used for private purposes, the Company can be held responsible for the content of email messages, including any attachments. Access to emails can be demanded as part of legal action in some circumstances.

It is, therefore, essential that email operates on the following guidelines:

- a. Email should be used for formal business correspondence and care should be taken to maintain the confidentiality of sensitive information. Official memos, documents, and letters for which signatures are essential should be issued on company letterhead regardless of physical or electronic delivery method.
- b. If electronic messages need to be preserved, they should be printed and filed.
- c. Limited private use of email is permitted, provided it does not interfere with or distract your work. However, Management has the right to access incoming and outgoing email messages to determine whether usage or involvement is excessive or inappropriate.
- d. Non-essential email, including personal messages, should regularly be deleted from the *Sent Items*, *Inbox* and *Deleted Items* folders to avoid congestion.
- e. All emails should include the approved Company disclaimer.

To protect the Company from the effects of the misuse of email, the following instructions are to be observed by all users.

a. No material will be sent as email that is defamatory, in breach of copyright or business confidentiality, or prejudicial to the good standing of the Company in the community or to its relationship with staff, customers, suppliers, or any other person or business with whom it has a relationship.

- b. Email is not to contain material that amounts to gossip about colleagues or that could be offensive, demeaning, persistently irritating, threatening, discriminatory, involves the harassment of others or concerns personal relationships.
- c. Email records of other persons are not to be accessed except by Management (or persons authorized by Management) engaged in ensuring compliance with this policy, or by authorized staff who have been requested to address a fault, upgrade, or similar situation. Access in each case will be limited to the minimum required to complete the task.
- d. When using email, a person must not pretend to be another person or use another person's computer without permission.
- e. Excessive private use, including mass mailing, "reply to all" etc. that are not part of the person's duties may be avoided.

What are the guidelines related to internet usage?

Internet is a facility provided by the Company for business use depending upon business needs. Limited private use is permitted provided private use does not interfere with or distract your work. Management has the right to access the system to determine whether individual's use is excessive or inappropriate.

The following activities using the Company's internet access are not permitted:

- a. Attending to personal activities of a business nature.
- b. Viewing, other than by accident, sites of incoming emails portraying obscene, violent, defamatory, and unlawful material and material that could cause the Company to be in breach of equal opportunity or anti-discrimination legislations, verbally, in writing or pictorially.
- c. Downloading or printing material as described above.
- d. Sharing or allowing to be seen by others, items as described above.
- e. Repeated or prolonged use that is not directly relevant to the user's work.
- f. Introducing computer viruses by failing to follow Company IT procedures.
- g. Downloading software from the internet or unauthorized disks and CD ROMs on to the internal network.

What are the guidelines related to the use of social media?

You must refrain from posting any posts that are illegal, abusive, defaming or not in accordance with the law. You must also refrain from posting comments on social media with respect to the Company, which may give an impression that your opinion is also the opinion of the Company.

You must ensure that your personal posts in social media does not create any risks to the Company. Posting updates/comments on religious/political issues or local customs should be avoided.

In case of any violations, the Company shall take appropriate disciplinary action against you, and you will be personally liable and responsible for such posts and comments.

• What are the consequences of failing to follow the guidelines?
Failure to comply with these guidelines will be subject to appropriate investigation and disciplinary action, up to and including termination. You should be continually aware that some conduct may also be open to criminal prosecution.

LEAVE AND HOLIDAYS

The objectives of the leave policy are to ensure that you have adequate time away from work for family holidays, special events, rest, and recreation while avoiding the build-up of large amounts of annual leave not taken. When the attached practices conflict with employment law for an Associate, the law will take precedence. Leave for full-time Associates will be as detailed below.

Casual Leave – You will be eligible for four (04) days of casual leave (CL) in a calendar year, which will be credited to you immediately upon joining. This is for personal and unforeseen work. This leave could be combined with privileged leave in case of marriage. Half day leave can be applied in case of emergency. You must inform your manager about your absence immediately on commencement of leave. You should get the leave approved from your manager within three (03) days after resumption of duty, otherwise it will be treated as privileged leave. Un-availed CL at the end of the calendar year will not be carried forward. There will not be any kind of encashment for unavailed CL and the same will lapse at the end of the year.

Sick Leave – You will be eligible for three (03) days of sick leave (SL) in a calendar year, which will be credited to you immediately upon joining. You will be required to produce a medical certificate from a certified medical practitioner and relevant medical records in case SL is required for more than three (03) days at a stretch. You must inform your manager about your absence immediately on commencement of leave. You should get the leave approved from your manager within three (03) days after resumption of duty, otherwise it will be treated as privileged leave. If you require extended SL because of any serious illness or accident, you may inform your manager of the same. The duration of the SL may be extended for you. Such extension is applicable on a case-by-case basis only and is at the sole discretion of the Management. Un-availed SL at the end of the year can be carried forward to the subsequent year and it can be accumulated up to ten (10) days. SL, over and above the maximum accumulated days so fixed, will lapse at the end of the year. No encashment will be allowed for SL.

Privileged Leave – You will be eligible for twelve (12) days privileged leave (PL) in a calendar year: one (01) day for each completed month of service. If you are under probation, you will not be allowed to avail PL until completion of probation. Until then, PL will be credited to your leave balance on pro-rata basis. PL can be accumulated to a maximum of twenty-four (24) days.

You must always apply at least fifteen (15) days in advance for availing PL and obtain prior approval from your manager. PL should not be prefixed or suffixed to any holidays and leave for half a day cannot be considered. PL should not be clubbed with any other kind of leaves except CL for purposes of marriage.

Restricted Holiday – Also known as optional holiday is a paid holiday for you to spend time with your families or avail it during any unforeseen circumstances. You are entitled to avail two (02) days of leave from a stipulated set of six (06) holidays in a year.

Menstrual Leave (She-roes Day Off) – This is a paid leave for all women Associates to avail leave during their periods. You can take only one (01) day leave per month and can take six (06) days of leave in a calendar year.

This policy does not apply to any contingent/contract staff collaborating with the Company.

• What are the key features and how does it work?

We suggest that you apply for leave when it is mutually convenient for you and the organization. However, in times of emergency, your manager will have the discretion to revise or revoke your leave to meet such business needs. To apply for leave, you will need to fill in an online leave application form in ESS and have it approved by your manager before proceeding for leave. The concerned branch or the relevant function will keep leave applications. A monthly leave report is sent to PX by the BU Head. Your leave balance will reflect in your ESS page.

What is the defined leave period?

Your leave accounting year is the calendar year, i.e., January 1 to December 31. These leaves are credited on a pro-rata basis from the date of joining, during the first year of service.

How many days of maternity leave does a woman Associate get?

Women Associates can avail maternity leave under the Maternity Benefit (Amendment) Act 2016. Any leave granted under this Act will not be used against your leave entitlement. Female Associates covered under the ESI Act can use the maternity benefit through ESI. Maternity Leave cannot be combined with PL.

Does the Company provide any paternity leave?

All married male Associates can avail seven (07) days of paternity leave with documentary proof for up to two (02) children. The application is to be submitted a month before the Associate wishes to use such leave. Paternity leave may be used during the birth of the child. Paternity leave will be in addition to other leave entitlements. No pay shall be due or payable instead of un-availed paternity leave.

Does the company provide adoption leave?

All women Associates are eligible for a paid leave of six (06) weeks and all male Associates are eligible for a paid leave of seven (07) days from the date of adoption upon submission of necessary documents to avail the leave. The leave can be availed for only one child and the infant should be blow the age of three (03) years.

What if there are intervening holidays during leave period?

Intervening holidays and weekends will not be considered for leave calculation other than for maternity leave purposes.

• Is there Leave without Pay (LWP)?

Leave cannot be used as a matter of right and it is at the discretion of the management. If you have exhausted your entire leave quota and still require time off, LWP is an option.

• Who is accountable for documenting leave?

It is your responsibility to obtain necessary approval on the leave application from your manager before going on leave. All leave applications should be applied through ESS. We recommend that you leave your contact address and alternate phone number with your manager before going on leave.

• What if I want to cancel my approved leave?

If your leave is cancelled for any reason, either at the request of your manager or you, please be sure to update your ESS page and inform your manager. You can later discuss with your manager, on another leave period.

Can I adjust my leave against notice period on resignation?

No adjustment of leave is permitted against notice period on resignation.

What are the mandatory holidays we have in a year?

We will schedule holidays as stipulated by law as well as to meet the varied regional requirement. The list of holidays will be issued at the beginning of the calendar year and will be available at your location.

COMPENSATORY OFF

• In what cases are compensatory offs granted?

The Company grants compensatory offs in the following two scenarios only:

- a. When the nature of work is such that Associates are required to work on Sundays or national holidays ("**Regular Work Requirements**").
- b. When Associates are required to work on Sundays or national holidays as per the request by the BU Head/Manager on an as needed basis ("Ad Hoc Work Requirements").

What is the policy governing compensatory offs for Regular Work Requirements?

- a. You will be required to log a minimum of eight (8) working hours.
- b. The BU Head will be responsible for considering and planning the allotment of compensatory offs in the shift roster.
- c. You will be entitled to avail compensatory offs only as per the shift roster submitted.
- d. Any diversion from the shift roster about compensatory offs should be approved by the BU Head.
- e. You will not be entitled to a compensatory off in the following cases:
 - > If you travel for business on a Sunday or a national holiday.
 - > If they are attending a scheduled business meeting or training program.
- f. Compensatory offs cannot be combined with any other type of leave or holiday.
- g. Compensatory offs need to be availed within thirty (30) days following accrual. Any remaining compensatory offs will lapse.
- h. You can avail only two (2) compensatory offs at a time.

What is the policy governing compensatory offs for Ad Hoc Requirements?

- a. Compensatory off can be availed only when the BU Head/Manager, at his/her discretion, requests you to work on Sundays or national holidays. You cannot decide to work on a Sunday or a national holiday and seek compensatory off.
- b. The BU Head/Manager should send an email to PX, in advance, if Associates need to work on Sundays or national holidays.
- c. BU Heads and Managers are advised to use their discretion and minimize instances of compensatory off requirements. This is to enable Associates to have rest every week from work.
- d. To avail a compensatory off, you should have worked for more than six (6) hours on a Sunday or national holiday.
- e. The decision of the BU Head will be final about awarding compensatory offs.

f. Compensatory offs need to be availed within thirty (30) days following accrual. Any remaining compensatory offs will lapse.

SMOKING, ALCOHOL & DRUGS

What is the Company's position on smoking?

Smoking is not permitted on Company property or offices at any time other than in the smoking zone of the office. At EXCELENCIA, a smoking zone is specifically provided and furnished for smoking. Smoking is accepted to be harmful to the health of those who smoke and those around them. Consequently, smoking while on company premises will be considered as gross misconduct and will render an Associate liable for instant dismissal.

• What is the Company's position on drugs and alcohol?

The Company is committed to creating and maintaining a safe, healthy, and productive workplace for all Associates and has a zero-tolerance policy regarding the use of drugs (in any form) on its premises or attending to other business-related work on its premises while under the influence of drugs (in any form). Contravening either of these points may lead to disciplinary action including termination.

Limiting the consumption of any alcohol made available is the responsibility of the Associate. Driving under the influence of alcohol or any form of drug is illegal; it is your responsibility to ensure you comply with this.

ANTI-SEXUAL HARASSMENT

The Company is committed to:

- a. Providing right to work with dignity and right to a safe environment free from sexual harassment.
- b. Creating a harmonious and productive working environment free from sexual harassment.
- c. Preventing and redressing complaints of sexual harassment from an aggrieved Associate and for matters connected therewith or incidental thereto.
- d. Protecting the privacy of individuals involved and to ensure that the complainant and respondent are treated fairly. Maintaining confidentiality about individual complaints and their disposition; and
- e. Encouraging Associates to express freely, responsibly and in an orderly way, opinions and feelings about any problems or complaints of sexual harassment. Retaliation against persons who report or provide information about sexual harassment or behavior that might constitute sexual harassment is also strictly prohibited. Any act of reprisal, including internal interference will result in appropriate disciplinary action. Associates are encouraged to report any conduct that they believe to be retaliatory towards themselves or another Associate. Any Associate found to have been engaging in retaliatory conduct will be subject to discipline up to and including termination.

To this policy, the person filing the complaint is referred to as "complainant" and the person against whom the complaint is filed is referred to as "respondent."

What is sexual harassment?

Sexual harassment is any unwanted, unwelcome, or uninvited behavior of a sexual nature which makes a person feel humiliated, intimidated, or offended. Sexual harassment can take different forms and includes one or more of the following unwelcome acts or behavior (whether directly or by implication): 1) physical contact and advances; or 2) a demand or request for sexual favors; or 3) making sexually colored remarks; or 4) showing pornography; or 5) any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

The following circumstances, whether direct or indirect, connected with any act or behavior of sexual harassment against an Associate will also amount to sexual harassment:

- a. promise of preferential treatment or threat of detrimental treatment of the Associate's employment in the Company; or
- b. threat about the Associate's present or future employment status; or
- c. conduct of any person which interferes with the Associate or creates an intimidating or offensive or hostile work environment for him/her; or
- d. humiliating conduct constituting health and safety problems for the Associate.

Sexual harassment can occur between an Associate and a co-worker, supervisor, manager, agent, consultant, or contractor.

We recognize that comments and behavior which do not offend one person can offend another. Management accepts that individuals may react differently and expects this right to be respected.

Sexual harassment is not just unlawful during working hours or in the workplace itself but in any work-related context, including conferences, work functions, business or field trips, and interactions with clients.

This policy is gender-neutral and applies to all Associates. Matters of sexual harassment of men and women alike will be heard and investigated as per the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (the "Act").

What do I do if I have been sexually harassed?

If you are being harassed:

- a. Tell the respondent that his/her behavior is unwelcome and ask him/her to stop.
- b. Keep a record of incidents (dates, times, locations, witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time in case the complaint is not filed immediately.
- c. File a written complaint as soon as possible with the Internal Complaints Committee (ICC) at <u>complaints.committee@excelenciaconsulting.com</u> Please check the notice board for details of members of the ICC of the Company.

What do I do if the sexual harassment continues?

If you are working for our Company and in the course of your work, you have been sexually harassed by anyone through means which are mentioned above, we urge you to come forward with a written complaint as early as you can. Your complaint will be taken seriously, and confidentiality would be maintained by us in the matter. We will have zero-tolerance towards such practices once they are proven.

A complaint with respect to sexual harassment may be made by a written or electronic application addressed to the ICC, through the Presiding Officer.

The complaint must be given to the persons specified above within three (03) months of the occurrence (the complaint can be made within six (06) months if the person is able to prove that there were some exceptional circumstances due to which complaint could not be made earlier) and we advise you to be vigilant and keep any document with you which can be used to substantiate an allegation. The redressal system will work based on other evidence if you cannot produce any documentary evidence.

If the complainant cannot make a written complaint because of physical or mental incapacity or death, the legal heirs can make the complaint on her behalf.

• What happens after I file the complaint?

Once the ICC receives the complaint:

- a. The respondent will be informed that a complaint has been filed against him/her (he/she will be made aware of the details of the allegation and the name of the complainant as it would be necessary for proper inquiry), and no unfair acts of retaliation or unethical action will be tolerated.
- b. The complainant can request for conciliation proceedings in the presence of the ICC. Please note that in such conciliation proceeding, the complainant cannot demand monetary compensation.
- c. The ICC will provide copies of the settlement as recorded during conciliation to both the parties. If the matter has been settled by conciliation but the respondent is not complying with the terms and conditions, the complainant can approach the ICC again.
- d. The ICC will question both the complainant and the respondent separately. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily. The ICC will call upon all witnesses mentioned by both the parties.
- e. The ICC can ask for specific documents from a person if it feels that they are important for the purpose of investigation.
- f. The complainant has the option to seek transfer or leave so that the inquiry process can continue smoothly and to prevent recurrence of similar situations or discomfort to the complainant. The leave can extend for a maximum period of three (03) months. Leave granted under this provision will be paid leave and will not be counted in the number of leaves that the complainant is statutorily entitled to. The complainant may be required to work from home, if it is practicable, keeping in mind the nature of work of the complainant, health, and mental condition. However, the complainant is under a good faith obligation and shall not abuse the process to request unjustifiably long periods of leave, keeping in mind the economic effects of the leave to the

organization. The ICC shall have the discretion to grant leave of an appropriate duration, depending on the facts and circumstances of the case, or grant an alternate measure such as transferring the Associate or the accused, as it deems fit.

Where leave is granted to the complainant, the ICC shall make best attempts to ensure speedy completion of the inquiry process and to minimize adverse economic consequences to the Company arising out of the absence of the complainant from the workplace.

- g. The complainant and respondent will be informed of the outcome of the investigation. The investigation must be completed within three (03) months of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the respondent will be subjected to disciplinary action accordingly.
 - ➤ The report of the investigation must be submitted to the employer, the respondent, and the complainant within ten (10) days of completion of the investigation.
 - > The employer must act on the recommendations of the ICC within sixty (60) days of the receipt of the report.
- h. The contents of the complaint made, the identity and addresses of the complainant, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by the employer should not be published, communicated, or made known to the public, press and media in any manner.

Any party aggrieved by the report of the ICC can file an appeal in the appropriate Court or Tribunal in accordance with the service rules within ninety (90) days of the recommendation been given to the employer. This option is available only where a woman Associate has been sexually harassed.

• What is the disciplinary action in case of sexual harassment?

Where any misconduct is found by the ICC, appropriate disciplinary action will be taken against the respondent. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action will be in addition to any legal recourse sought by the complainant.

If it is found through evidence by the ICC that the complainant has maliciously given false complaint against the respondent, disciplinary action like the ones for sexual harassment will be taken against the complainant as well.

Regardless of the outcome of the complaint made in good faith, the complainant and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the ICC must ensure that the complainant or the witnesses are not victimized or discriminated against by the respondent. Any unwarranted pressures, retaliatory or any other type of unethical behavior by the respondent against the complainant while the investigation is in progress should be reported by the complainant to the ICC as soon as possible. Disciplinary action will be taken by the ICC against any such complaints which are found genuine.

• What are the legal responsibilities of the Company & Associates?

The Company has the legal responsibility to prevent sexual harassment. Therefore, managers and supervisors have a responsibility to:

- a. Monitor the working environment to ensure acceptable standards of conduct are always observed.
- b. Be a role-model for appropriate behavior.
- c. Treat all complaints seriously and take immediate action to bring it to the notice of the ICC.

All Associates have a responsibility to:

- a. Comply with the organization's anti sexual harassment policy.
- b. Offer support to anyone who is being sexually harassed and let them know where they can get help and advice.
- c. Maintain complete confidentiality if they provide information during the investigation of a complaint.

WORKPLACE HARASSMENT

Associates must ensure that they never verbally or physically mistreat others or engage in offensive behavior, and they should not tolerate those who do. This includes harassing, bullying, abusive or intimidating treatment, inappropriate language or gestures, disorderly conduct, violence, and any other conduct that interferes with a co-worker's ability to do his or her job.

WHISTLE BLOWER

Who is a whistle-blower & what is the Company's position?

We take malpractice and misconduct seriously and are committed to a culture of openness in which Associates can report legitimate concerns without fear of penalty or punishment. To provide Associates with an opportunity to voice their concerns outside the line management structure, but still within the organization, the Company offers a channel for reporting severe breaches of laws, regulations, and Company policies. We have adopted a progressive approach to deal with Associate allegations so that every Associate can feel that he or she is not risking job security. While we offer protection in recognition of the risk taken by honest whistle-blowers, it expects Associates to make honest reports on irregularities and violations found without indulging in malicious reporting.

• What evidence must be provided?

The Associate can report any matter that he/she believes to have occurred and may provide evidence on any of the following:

- a. The violation of laws and regulations
- b. The breach of Company Code of Conduct/Policies
- c. Financial Malpractice
- d. Wastage/misuse of organization's funds

What criteria must be satisfied?

The whistle-blower must satisfy the following criteria:

- a. It should be made in good faith.
- b. It is not used for personal gain.
- c. It should provide the identity of the whistle-blower.

The Company's CEO would function as the reporting officer responsible for investigating all matters about whistleblowing.

WORK ENVIRONMENT DISCIPLINE

What is the policy on work desk maintenance?

We seek your co-operation to keep your work area as clean & neat as possible.

• How do I update changes in my personal information?

Associates are required to update the ESS whenever there is a change in personal information.

What are the guidelines for the usage of business facilities?

Personal visitors to the office should meet in an area where other Associates will not be distracted, and the meeting should be as brief as possible. No personal work is permitted in the office or official workplace. You should take enough care to ensure that no damage is caused to Company property and equipment. Company letterhead is not to be used for any personal purpose.

What are the communication expectations?

All internal communication shall follow appropriate protocol or as explicitly defined in any organization procedures unless under certain contingencies. Communication that is offensive, abusive, discriminatory, sexually explicit, profane, disruptive, or harassing is prohibited and can lead to disciplinary action including termination. The voice levels of Associates should always be kept at appropriate levels during business hours.

• What do we do with general circulars & instructions?

Authorized authorities use circulars only and Associates are expected to read and comply with instructions as required in circulars.

• What is the guideline for personal finances?

Associates are expected to conduct themselves and their financial affairs in a manner deserving of public trust and confidence that reflects favorably on the Company. The Company shall, at no point in time, be responsible for any personal financial commitments entered by an Associate.

What is the security search practices in the company?

If the Company considers it necessary, security will search any person or baggage carried by Associates which may include hand baggage, parcels, lockers, and cupboards used by the Associates, or Company vehicles on entering or leaving the company premises.

GIFT & ENTERTAINMENT

In connection with certain holidays and other occasions, it is customary in many parts of the world to give tips of nominal value to customers, government officials, and other parties who have a business relationship with the Company. The Company is

committed to ensuring all business relationships with suppliers and clients are legal and based on professional integrity.

What considerations should be made?

When we make a gift to a customer, a government official, or any third party, we should keep the following in mind:

- a. It is not done to obtain or retain business or gain an improper advantage in business.
- b. It is lawful under the laws of the country where the gift is being given and permitted under the policies of the client.
- c. It constitutes a Bonafide promotion or goodwill expenditure.
- d. It is not in the form of cash.
- e. The gift is of nominal value (on an individual and aggregate basis).
- f. The gift is recorded in the Company's books and records.

When accepting gifts, the same principles apply if a customer or supplier wishes to give a gift or any other token of their appreciation.

ANTI-BRIBERY & CORRUPTION

The Company discourages any form of bribery and corruption during its business activities. The Company respects all law countering bribery and corruption in all jurisdictions in which it operates.

Bribery or corruption means offering or accepting any improper benefit in the form of cash, kind, or any other benefit to the following persons in connection with regulatory permits, taxation, customs, and judicial and legislative proceedings:

- a. A government official at international, national, state, and local level including officers of the public sector, private sector and undertaking and other government and private agencies.
- b. Associates or their relatives or any other person who shall obtain/retain a business or personal advantage.

All Associates (including relatives/family members*) and business partners are forbidden to offer or accept any bribe and be involved in corrupt practices while dealing with/on behalf of the Company.

*"Relatives/family members include Associate's spouse, children, parents, and siblings.

Any such practice implemented by any Associate through our customer or supplier, or service providers and any other business partners is also forbidden and shall be considered as involvement in corrupt practices.

Also, it is important that Associates take steps to ensure that third-party service providers including SME's, security agencies, consultants, agents, brokers, lobbyists, tax advisers, and other professionals acting on behalf of the Company comply with this Code in connection with the Company.

Most bribery and corruption practices stem out from activities such as:

a. Gifts and payment made to secure an advantage in business transactions.

- b. Facilitation payment or other kickbacks made to accelerate routine or necessary business actions. Facilitation payments are the payments made to secure or speed up routine government actions such as issuing permits or similar approvals.
- c. Political contributions made to ensure an advantage in business transactions.
- d. Provision of favors to public officials other than through standard business conduct procedures.
- e. Uncompensated use of company's services or facilities.

The following should be adhered to:

Always

- a. Ensure that all third parties that you deal with are aware of and acknowledge the Company's approach to bribery and corruption before you enter relationships.
- b. Conduct appropriate due diligence, background checks, and reference checks on customers, suppliers, and third parties before you enter a deal or relationship.
- c. Seek a breakdown of all fees/costs upfront and question anything which appears unusual.
- d. Ensure that any hospitality you refer, or hospitality offered to you, is moderate, reasonable, and appropriate and serves a legitimate business purpose.
- e. Maintain complete and accurate books and records of accounts, including all business transactions and dealing entered in to for or on behalf of the company.

Never

- a. Accept or offer a bribe. Irrespective of the amount of payment, no one is allowed to make "facilitation payments" to government officials or agents.
- b. Accept any hospitality such as stay at a hotel/guest house offered to you which is unreasonable and inappropriate.
- c. Accept or offer any personal favor that may be seen as an inducement to enter or renew a contract or expedite routine transactions.
- d. Deal with any third-party who could bring the Company into disrepute.
- e. Employ agents to circumvent this Code of Conduct-to-conduct corrupt practices for or on behalf of the Company.
- f. "Shrug off" or fail to report any indication of payments of improper nature.
- g. Maintain unrecorded funds and accruals that can be considered as a source of bribery payments.

CHARITABLE CONTRIBUTIONS

The Company believes that charitable contributions and donations are an integral part of its corporate social responsibility. Typical areas for granting support are education and research, social welfare, disaster relief and other similar social causes.

Before making a charitable contribution on behalf of the Company, keep in mind the following:

- a. The recipient is a registered, tax-paying, and recognized organization.
- b. The contributions are permissible under applicable local laws.
- c. Contributions are made without demand or expectation of business return.
- d. Beneficiaries of such contributions should not be related to the directors or executive officers of the Company.
- e. Contributions shall not be made in cash or to the private account of an individual.

f. The Company's books of accounts document any amounts contributed, or donations made towards charitable causes.

LOBBYING

If our work includes meetings with government/elected officials, this can be considered 'lobbying.' We must be aware that such activities are regulated. We should not claim to represent our Company at such meetings unless we are specially designated by the Company to do so. As in all other spheres of our activity, any meetings of this sort should be conducted with high integrity, in line with our corporate values.

CORPORATE RESPONSIBILITIES

Environment is one of the values of the Company, and it guides us to be responsible and sensitive towards the environment and communities in which we operate.

We are amongst those companies that strive to create a better society. We seek to engage in open and transparent dialogue and consultation with the community and representatives of civil organizations.

We respect any concern that the community may have towards our operations/initiatives and always try to address the concerns and issues raised appropriately.

Always

- a. Respect the cultural and social values of communities and countries where the Company operates or purposes to serve.
- b. Be sensitive to the needs of the local community and raise any concerns about operations of the company with the corporate responsibilities function.
- Encourage participation in local community development initiatives and civic causes as per norms defined in our business and corporate responsibility strategy.

Never

a. Ignore concerns raised by local communities in geographies where the Company operates.

ENVIRONMENT SAFETY AND HEALTH

The Company is committed to the protection of natural environment, to the safety of communities in which we operate and to the health, safety, and security of our people. It is the responsibility of each one of us to understand and comply with environment safety and health policies and procedures.

We strive to create a better society and seek to engage an open and transparent dialogue and consultation with the community.

ASSOCIATE RELATIONS

PERFORMANCE IMPROVEMENT PLAN

A performance improvement plan (PIP), also known as a performance action plan, is a great way to give struggling Associates the opportunity to succeed while still holding them accountable for past performance. It is not always clear why an Associate has poor performance. Therefore, it is critical to allow for an open dialog and feedback from the Associate to help determine whether the Associate has all the tools and resources necessary for him or her to be successful. PIPs may be used to address either failures to meet specific job performance-related issues or behavior-related concerns. PIPs may lead to several different outcomes, including improvement in overall performance, the recognition of a skills or training gap, or employment actions such as transfer, demotion, or termination. Alternatively, a PIP may be used for Associates who may be new to a role as a tool to communicate performance expectations.

• What are the steps in a PIP?

Document Performance Issues

The first step in the PIP process is for the Manager to document the areas of the Associate's performance that need improvement. In documenting the main performance issues, the Manager should be objective, factual and specific and provide facts and examples to clarify the severity or pattern of performance concerns further. When developing a PIP, it is a best practice to use a traditional format to ensure consistency in the information given to all Associates and to help protect the employer should legal claims arise at some point in the future. The format of the performance improvement plan will vary by employer and should include the following components:

- a. Associate information
- b. Relevant dates
- c. Description of performance discrepancy or gap
- d. Description of expected performance
- e. Description of actual performance
- f. Description of consequences
- g. Plan of action
- h. Signatures of the manager and the Associate
- i. Evaluation of the plan of action and overall performance improvement plan

Develop an Action Plan

Next, the Manager should establish a provisional action plan for improvement, which may be adjusted based on Associate feedback in the meeting. Making the process collaborative can help in identifying areas of confusion or misunderstanding on the Associate's part and can encourage ownership of the issue by the Associate. This action plan should include specific and measurable objectives that are accurate, relevant, and time-bound (otherwise known as SMART goals). When developing a PIP, it would be useful to draw on the job description and PX policies to identify the performance or behavioral issues and expectations.

The Manager should determine if the Associate may need any additional resources, time, training or coaching to meet these objectives. The plan should identify what management will do or provide to assist the Associate in achieving these goals.

This action plan should help set performance expectations and should include a statement about the consequences for not meeting those objectives. Communicate if termination is a possibility.

Review the Performance Plan

Prior to meeting with the Associate, the Manager should seek assistance from his or her manager or an PX professional to review the PIP. This third-party should ensure the documentation is stated clearly and without emotion. The third-party can also review the suggested action plan to make certain it is specific, measurable, relevant, and attainable within the PIP timeline, which will be sixty (60) days.

Meet with the Associate

The Manager must clearly lay out the areas for improvement and plan of action. The Manager may need to modify the action plan slightly after receiving the Associate's input and feedback. After making changes to the plan, the Manager and the Associate should sign the PIP form.

Follow-up

The Associate and Manager should establish regular follow-up meetings (weekly, biweekly, or monthly), which can be outlined in the PIP. These meetings should discuss and document progress toward objectives. It is best when an Associate is provided the opportunity for follow-up meetings to ask questions and seek guidance or clarification on performance expectations. The Manager should ensure that any potential roadblocks are discussed, and that the Associate has been provided the necessary tools and training.

Successful progress made toward the goal should be recognized as a means of motivating the Associate to continued improvement.

PIP Conclusion

If an Associate is unable to improve or refuses to commit to the PIP, or if his or her performance worsens, then the Manager should close the PIP and consider a reassignment, transfer or demotion or terminate employment based on the specific circumstances.

When the Associate does show some improvement, but is unable to achieve some or all the established action plan objectives within the PIP timeline, there are a few options:

- a. If the Associate is doing his or her best but just cannot meet one or more objectives, the Manager may agree to extend the PIP for a few more weeks or months.
- b. If the Manager determines, in retrospect, that the objectives were too hard or not completely within the Associate's control, the Manager may decide to either extend the PIP or end the PIP due to the progress that was observed.
- c. If the Manager determines that the Associate is not a good fit or is not really trying to improve even after all this effort, then the Manager should consider job reassignment, transfer or demotion, or termination.

When the Associate has responded positively by meeting the objectives, the Manager should formally close the PIP and allow the Associate to continue employment. This may occur prior to the deadline outlined in the PIP document.

This should be a positive occasion for the Associate, but the Manager must be sure the Associate understands that continued good performance is expected.

DISCIPLINARY POLICY AND PROCEDURE

General principles

We aim to ensure that our people behave in a way that ensures everyone, including our customers and suppliers, are treated fairly and without bias or discrimination. We encourage behavior that supports and fosters self-discipline and promotes our code of conduct.

Where deemed appropriate, disciplinary measures may be taken when people behave in a way that detracts from our ability to deliver a quality service to our customers, contradicts our ethics & code of conduct or in any other way perceived to adversely affect our company, objectives, or good reputation.

This policy establishes an equitable and consistent approach to addressing unsatisfactory work performance and/or conduct by:

- ensuring the counselling takes place to reinforce the expected performance or conduct standards
- establishing a process under which warnings may be issued and discussed
- providing for disciplinary action where performance or conduct does not improve

Definitions

Counselling: The discussion and analysis of issues which affect an Associate's conduct and/or work performance to find solutions to on-the-job problems. Counselling is used to improve an Associate's performance where their behavior or conduct is unacceptable or unsatisfactory.

Disciplinary action: Action taken by the company to deal with any actual or perceived breach of policies, codes, or other standards of work performance and/or conduct.

Misconduct: Behavior so serious in its nature that it may warrant severe discipline of the Associate by the employer including but not limited to instant dismissal

Rights and responsibilities

All persons have the right to:

- have the principles of natural justice and procedural fairness observed, this means:
 - the Associate who is the subject of concern must be informed of all the allegations in relation to his/her behavior
 - the Associate must be provided with the opportunity to put forward their case
 - all parties must have the right to be heard
 - all relevant submissions and evidence must be considered
 - irrelevant matters must not be considered
 - the decision-maker must be impartial, fair, and just
- investigations and proceedings that are conducted honestly, fairly and without bias
- no undue delay in investigations and proceedings.

It is the responsibility of all parties involved in counselling or disciplinary action to participate fully in the resolution process in good faith. Confidentiality must be respected and always maintained within the constraints of the need to fully investigate the matter, subject to any legal requirements for disclosure and consistent with the principles of natural justice.

Procedure

- 1. Identify the problem. Notify the person of the problem immediately. A lag here could imply your acceptance of poor performance or unacceptable behavior.
- 2. Discuss the problem and investigate the cause. Conduct formal or informal counselling a private meeting/interview is appropriate to discuss the reasons. The person may not necessarily be aware of the problem.
 - a. Get a response/reason/explanation. Be prepared to give a fair hearing of and proper consideration to any reason or excuses given.
 - b. Negotiate outcomes (e.g., training).
 - c. Set a period for review.
 - d. Make the person aware of the consequences of noncompliance with requirements, for example:
 - i. your future employment may be reviewed (first warning)
 - ii. your employment WILL be terminated (final warning).
- 3. Document the outcome.
 - a. The person should be allowed to see, sign, and make any comments on this file note.
 - b. Concentrate on the facts of the situation and the clear quantifiable measurements to support these facts. Ensure there is evidence for data. This requires good record-keeping to be an essential part of the process, and therefore to also be a part of the management practice of the business.
 - c. Monitor change. The person should be allowed time to demonstrate improvement, in line with the review period and standards set at the counselling meeting.
 - d. If the behavior persists, function as per the notified consequences.

GRIEVANCE HANDLING/PROBLEM ESCALATION MECHANISM

Misunderstandings and issues are inevitable in even the best working relationships. To ensure such situations receive prompt attention, this policy is to assure that you follow a formal problem-solving procedure without fear of censure or reprisal.

Whenever any problem arises, you should discuss the problem with your manager frankly and sincerely. If your manager is unable to resolve the problem or fails to aid satisfactory to you, you should discuss the problem with PX and/or with management team.

EMPLOYMENT OF RELATIVES

The purpose of this policy is to provide a clear understanding of rules about hiring of relatives/family members.

Can I refer my relatives/family members?

Yes. Your relatives/family members are eligible to be hired, but care must be taken to ensure that such relative or family member is not in a reporting relationship with you.

ASSOCIATE SUGGESTION PROGRAM

You are a valued partner in building the organization into a Great Place to Work. The Associate Suggestion Program is designed to harness your creativity and talent. All accepted ideas will become the patented property of the Company.

- Who can participate in suggestion program?

 All Associates across the business units can participate in this program and provide their suggestions.
- What is the process to participate?
 You can post your ideas and suggestions related to your immediate work through ESS.



What is the process of selection?

A selection panel of experts will evaluate all the shortlisted suggestions and select based on originality of idea, benefit, feasibility, and scope of the ideas.

What is the reward if my idea/suggestion is selected? Certificate of commendation will be given to all accepted ideas and cash awards will be given based on the actual realization of increased profit/saved revenue.

What if two people have given the same idea?

In cases of duplication or similarity, the suggestion received first will be treated as the original idea.

EQUAL OPPORTUNITY EMPLOYER

The Company endeavors to offer equal opportunities to all its Associates and not engage in or support discrimination in hiring, compensation, access to training, promotions or career advancement, termination or retirement based on ethnic origin, position, color, race, caste, religion, disability, gender, or political orientation.

To support the above–mentioned aspirations, the Company has categorized guidelines as follows:

- a. Equal employment and growth opportunity.
- b. Assigning roles as per Associate's capabilities.
- c. Discrimination free pay.

What is the goal of equal opportunity?

The goal of equal opportunity is to ensure equal access in all phases of employment. Employment decisions are based solely on merit.

EQUAL EMPLOYMENT AND GROWTH OPPORTUNITY

The Company strives to hire and promote people based on their qualifications, performance, skills, and competencies and is determined to provide a work environment which is free from any form of discrimination, both direct and indirect.

ASSIGNING ROLES AS PER ASSOCIATE'S CAPABILITIES

You will be given assignments that best suit your capabilities and will be appropriately empowered to function at an optimal level. Adequate opportunities will be provided to you to upgrade your skills through various functional, technical, and behavioral training.

DISCRIMINATION FREE REMUNERATION

Remuneration at the Company is determined by the external market and your performance.

The Company always

- a. Treats all Associates fairly and with respect and dignity.
- b. Cultivates culture of meritocracy where Associates are recognized and rewarded on merit.

The Company never

a. Overlooks the local applicable labor and employment laws with which the Company must comply.

REPORTING DISCRIMINATION PROCEDURE

The discriminated Associate can make direct approach to the person making the discrimination and stress that his/her behavior is unwelcome and firmly request to stop such behavior. Further, he/she should also bring the concern to the notice of their manager and/or PX contact.

RAISE YOUR VOICE

The Company offers several channels for raising concerns. Use the channels most comfortable to you.

Within your BU, your manager will be in the best position to resolve an ethical concern quickly. However, your direct Manager is not your only option. Other options/resources include:

- a. Your PX member
- b. The CEO's office

SECURITY & INTELLECTUAL PROPERTY

CHANGES IN PERSONAL DATA

To aid you and/or your family in matters of personal emergency, we need to maintain up-to-date information.

Changes in name, address, telephone number, marital status and beneficiaries should be communicated to the PX Function promptly.

VISITORS

Visitors such as family members, clients, or prospects and vendors are allowed in the office while not disturbing colleagues or office environment. You will be responsible for your visitor until they leave the office. You are advised not to discuss confidential professional matters in front of visitors.

CONFLICT OF INTEREST

To be fair, honest, and transparent in all its actions and decisions, the Company expects you to avoid obligations to or relationship with any person or business with whom the Company competes or does business. Such obligations or relationships could affect judgment in fulfilling your responsibility towards the Company and give rise to a conflict of interest.

You must avoid any personal activity, investment or association which could appear to interfere with good judgment concerning the Company's best interests. You must not exploit your position or relationship with the Company for personal gain.

It is imperative that potential conflict of interest situations is brought to the management's attention in a timely manner and appropriate action is taken.

What does conflict of interest mean?

When the interests or benefits of one person conflict with the interests or benefits of the Company, a conflict of interest is said to occur. We must avoid situations involving actual or potential conflict of interest so that even the slightest doubt about our integrity is not raised. Conflicts of interest also occur when we or our family members receive improper personal benefits, or preferential treatment because of our position, or the position of a family member, in the Company. Remember that such situations might impact our judgment or responsibilities towards our Company and our shareholders and customers.

• When could I be faced with a conflict-of-interest issue?

Some examples include outside employment. If you take part in any activity that enhances or supports a competitor's position or accept simultaneous employment with any other company or business entity, it is considered outside employment and a conflict of interest. This includes performing services as an Associate, agent or contractor for a customer, supplier or any other entity that has a business relationship with the Company while working at the Company.

What should I do if I have any questions?

All such situations must be disclosed by reaching out to the PX team. Remember, having a conflict-of-interest situation may not necessarily be so. When faced with such issues, ask yourself:

- a. Would this create or appear to create an unfair incentive for me or my friends and family?
- b. Am I putting the Company at risk of violating laws or agreements with our customers?
- c. Would this look bad if it were brought up in social media?
- d. Would this distract me from doing my job?

You must also disclose your potential conflict of interest on an annual basis to your PX. You should continue to disclose such circumstances each year in your annual Code of Conduct training if the potential conflict is ongoing. Since the situations for other conflicts of interest are wide and many, it would be impractical to attempt to list all situations. If a proposed transaction or situation raises any questions or doubts, you should raise it PX.

Where there are external involvements that do not represent a conflict of interest, these must not affect performance or attendance whilst working. If such involvement does affect performance or attendance, it will be considered as a conflict of interest giving rise to the remedies described above or disciplinary proceedings including dismissal.

ACCESS & IDENTITY CARD

At the time of joining, Company shall provide you a Photo ID and access card. You are expected to wear your access card and ID card in the Company premises. However, in case you lose or misplace the ID card or access card, you must report the same immediately to PX to avoid its misuse by unauthorized persons and the cost of the replacement will be recovered accordingly. The Access/ID card must be surrendered when you leave the Company and the same should be handed back to PX. Issue of duplicate cards shall involve a cost of Rs. 500 (Rupees Five Hundred).

COMPANY CONFIDENTIAL INFORMATION

For the Company, its confidential information is an asset, and every director, Associate and agent of the Company must protect it. Confidential information includes all nonpublic information (regardless of its source) that might be of use to the Company's competitors or harmful to the Company if disclosed. We must take care to ensure that all confidential information is used only for Company business purposes. Upon joining, you will sign a Confidentiality and Non-disclosure Agreement which details your confidentiality obligations to the Company. As an Associate, you will have access to significant amounts of Company information that may not be available to the public, and you should preserve the confidentiality of information obtained in the Company's service. Information of a confidential, private, and sensitive nature must be used responsibly and controlled and protected to prevent its prohibited, arbitrary, or careless disclosure. Unless the Company has provided its specific consent, which should preferably be in writing, or there is a legal or professional right or duty to disclose, you are prohibited from disclosing confidential Company information. Confidential or proprietary information about clients, our organization, or other parties, which has been gained through employment or affiliation with the Company, may not be used for personal advantage or for the benefit of third parties. You are also responsible for properly labelling all documentation. This responsibility includes the safeguarding,

securing and proper disposal of confidential information and extends to confidential information of clients and third parties.

COMPANY INTELLECTUAL PROPERTY

The intellectual property (IP) of the Company must be protected as a vital business asset. Our IP portfolio includes copyrights, patents, trademarks, service marks, trade secrets, design rights, logos, brands, and expertise. It is expected that you will treat this as IP and therefore it should be stored securely either physically and/or electronically. Failure to properly look after Company information or property will result in disciplinary proceedings including dismissal.

You have the obligation to identify and protect IPs of the Company. The obligation is not only in current relationship capacity but also for all future periods. Even in case this relationship is discontinued.

"Intellectual Property" as commonly understood includes the following:

- a) Patents
- b) Copyright
- c) Trademarks and Service Marks
- d) Other confidential business information such as:
 - > Sales, marketing, and another corporate database
 - > Business strategy and plans
 - Software bought or developed by the Company
 - Commercial information including pricing contracts

In addition, other confidential business information such as personnel lists and customer data must be protected.

The Company not only endeavors to protect its IP, but in addition is committed to respect the intellectual and protected information of others including its customer and business partners.

Always

- a. Respect the IP of the Company, its customers and business partners.
- b. Seek advice from your manager when assigning work to a new Associate if there is a risk that the Associate might use protected/classified information of prior employer.

Never

- a. Load any unlicensed software on any computer/laptop of the Company.
- b. Copy/use documents or materials (including computer software) that are copyrighted or when you do not have specific permission to do so.
- c. Knowingly infringe a valid patent of another party.

COMPANY PROPERTY

• What are the rules regarding safety of laptop provided by the company?

All laptops are the property of the Company and are provided to you for a period as deemed necessary by the Company. You must use the laptop allotted to you only for official purposes and during rightful discharge of your duties and not for generating, transmitting, corresponding anything that is unlawful or abusive. Any such act may lead to you being subjected to disciplinary action, which may lead to suspension from work or any other appropriate action as per policies of the Company and governing laws.

Laptop with standard configuration shall be made available to you. Such configuration will be reviewed by the IT Department as and when the need arises. Any additional configuration, equipment and accessories can be obtained only after prior written approval from the BU Head.

You are responsible for protecting the laptop allotted to you from theft or loss and for protecting the information it contains. The rules below are provided to assist in assuring that the laptop is always secure. All conceivable situations cannot be covered in this document. Therefore, you are expected to exercise professional judgment and common sense when faced with unusual or unforeseen circumstances.

You are required to provide details of the laptop allotted to you in the Material Outward Form provided by the IT team. The details to be provided include the make of the laptop, the model, and the serial number.

The following are the general rules relating to laptops.

- a. You will not attempt to install software (messengers or any other malicious software) or hardware or change the system configuration including network settings. Any damage to the laptop on account of such installation shall be borne solely by you.
- b. You will ensure that the data in the laptop is not misused or transferred to storage devices. Any such act will make you liable for disciplinary action.
- c. You are expected to protect your laptop from damage and theft.
- d. You will be monetarily responsible for any damage to the laptop.
- e. You will not be held responsible for problems to the laptop resulting from regular work-related use; however, you will be held responsible for any problems caused by your negligence as deemed by the Company.
- f. You will provide access to the laptop that has been assigned to you upon request by the Company.

• Are there any other dos and don'ts for the usage of laptop?

- a. Power-off your laptop whenever it is not in use. Do not carry your laptop in sleep or hibernation mode.
- b. Personal use of laptop is prohibited.
- c. Keep your laptop close to you and in sight. Otherwise, keep it locked away securely.

- d. Never store passwords with your laptop or in it carrying case.
- e. Travel without your laptop if it is not needed.
- f. Do not place drinks or food in proximity of your laptop.

While at the Office

- a. Keep the working screen of your laptop locked while you are away from your desk so that no other person can use it for any purpose.
- b. Keep the password of your laptop confidential.
- c. Laptops should be taken home at night or secured out of sight in the drawer or cabinet of your desk.

While Travelling in a Car

- a. Do not leave your laptop unattended in the car.
- b. If you must leave your laptop unattended in the car even for a short time, always lock your laptop either in the trunk of the car or any other lockable compartment. The laptop must be locked and stored out of sight in the car. A visible laptop is a target.

While in a Hotel

- a. Do not leave your laptop unattended in hotel rooms.
- b. If you leave your room, secure your laptop in the locker provided in the room. If the locker is small or unavailable, lock your laptop in your travel luggage.

Data Security

- a. Always choose a long and strong password for your laptop and keep it confidential.
- b. You are personally accountable for all network and systems access under your user ID, so keep your password secret. Never share it with anyone, not even members of your family, friends, or IT team.
- c. Laptops are provided for official use by authorized Associates only. Do not loan your laptop or allow it to be used by others such as family, friends, colleagues, etc

Reporting a Theft

In case of a laptop theft, immediately file a theft report with the nearest police station providing all information about the laptop including time, date, location of theft and any other details that may be required. You should immediately inform the IT team about such theft. In case of any negligence on your part in taking the abovementioned steps, the Company shall have the right to deduct appropriate amounts from your salary.

Separation from the Company

- a. Upon resignation or termination, you must return the laptop to the IT team before your last working day is over.
- b. Failure to return the laptop shall result in withholding of the full & final settlement until the laptop is returned.

c. In case you abscond from the services of the Company or are absent from the services without authorization and if you are in possession of a company laptop, the Company shall have the right to initiate legal action against you.

• What are the dos and don'ts for the usage of other company property?

Always

- a. Ensure that all the assets are protected from loss, damage, misuse, or theft.
- b. Ensure that Company assets are used only for legitimate business purpose of the Company or such other authorized purposes. Partial, occasional, or incidental personal use is permitted of certain Company equipment such as laptop, data card and phones issued for individual use.
- c. Make sure that the expense claims, voucher, invoices etc. are accurate and submitted in a timely manner.
- d. Ensure that Associates, contractors/vendors, or agents return the equipment/facilities/amenities provided by the company on resignation, termination, retirement, or any other discontinuance from the services of the Company.

Never

a. Use or allow anyone else to use Company's property such as equipment's and facilities for personal purposes.

COMPANY FUNDS

You are responsible for the usage of the Company funds over which you exercise control.

Funds must be guarded against theft, misuse, loss, fraud and used only for legitimate business purpose. This includes money advanced for official travel and entertainment fund or credit card that an Associate may hold.

FINANCIAL REPORTING, RECORDS, DISCLOSURES & AUDITS

The integrity of our financial transactions and records is critical to the operation of our business. Our shareholders' trust is based on their confidence in the accurate recording of our financial transactions. Additionally, we are bound by certain standards for accurate financial reporting, and we are required to have appropriate internal controls and procedures. If you have responsibility for or any involvement in financial reporting or accounting, you should have an appropriate understanding of, and you should seek in good faith to adhere to, relevant accounting and financial reporting principles, standards, laws, rules and regulations and the Company's financial and accounting policies, controls, and procedures. If you are a senior officer, you should seek to ensure that the internal controls and procedures in your business area are in place, understood and followed. Additionally, you should take every precaution, whether you are otherwise required to be familiar with finance or accounting matters or not, to ensure that every business record or report with which you deal is honestly filled in, accurate, complete, and dependable.

Accurate Public Disclosures

The Company is committed to providing full, fair, accurate, timely and clear disclosures in reports and documents that we file or submit to our regulators and in our other public communications. To enable this, we must ensure that we comply with our disclosure controls and procedures, and our internal control over financial reporting.

Recording of Financial Transactions

The Company is committed to maintaining complete, accurate and timely records and accounts to appropriately reflect all business transactions in accordance with the Company's accounting procedure.

Auditors

Our outside auditors have a duty to review our records in a fair and accurate manner. We must cooperate with them in good faith and in accordance with law. We must never mislead them in any manner regarding financial records, processes, controls or procedures or other matters which they may enquire about.

• Interacting with Regulators

We must fully and truthfully cooperate with any examination or request for information from a regulator or law enforcement agency. Any contact with law enforcement agencies or regulators must be coordinated through the PX function.

Record Retention

All Company records shall be maintained in accordance with the applicable document retention laws.

Reporting Violations

Any Associate requiring any clarifications regarding this section or below instances may contact the Finance Head as appropriate.

- a. Uncertainty about the validity of any transaction.
- b. When directed to create false or misleading entry data on or report.
- c. Un-intentional mistake noticed post recording of transactions/committing mistake.
- d. Observance of any other financial irregularities. Any willful, material misrepresentation of and/or misinformation on the financial accounts and reports shall be regarded as a violation of the Code.

Always

- a. Ensure that the financial and non-financial information (such as disputes, claims, contingent liabilities) and operating metrics are reported accurately and in a timely manner.
- b. Ensure that all Associates demonstrate financial integrity, professionalism, and due diligence in submitting /approving expenses claims.
- c. Maintain the Company record duly considering regulatory requirements as well as Document Retention Policy of the Company. Specifically, ensure appropriate retention of documents relating to actual, pending litigations and government/regulatory investigations or in the circumstances where there is reason to believe that such litigation or investigation is likely to occur in the future.

Never

- a. Allow any willful omissions of any transactions from the books and records.
- b. Establish or maintain any undisclosed or unrecorded account, fund, or asset.
- c. Attempt to falsify any record or accounts.

INFORMATION TO MEDIA & OUTSIDERS

• What are the guidelines regarding disclosing information to the media and outsiders?

To protect our confidential information from misuse and to ensure that only accurate information about the Company is disclosed, we have designated our Marketing team to manage exchanges with the media. Additionally, our CEO is the official Company spokesperson for financial matters. All inquiries or calls from the press and financial analysts should be referred to the CEO's office.

Always

- a. Direct all media requests for Company related information to the marketing communications function.
- b. Ensure that all communication to the media is done only by the authorized spokespersons. No other Associate should deal directly with the media, financial community and should not provide opinion as a representative of the Company

In case you have been designated as an authorized spokesperson of the Company, remember that:

- > All statements made to the media are true and correct.
- > There is appropriate combination of disclosure of forward-looking statements with cautionary statements.
- Approval of customers or business partners are obtained if forward looking statements are made in reference to customers or business partners.
- a. Take advice from the marketing communications function before talking about Company related matters with the reporter or analyst, either on or off the record.
- b. Ensure that contents of non-financial formal speaking engagements on behalf of the Company are vetted by the concerned leadership team members and shared with marketing communications function well in advance for their clearances.
- c. Ensure that all communication related to release/publishing of the audited financial statements is done only by the authorized representative of the marketing communications with prior approval from CEO.

Never

a. Make statements or harmonious remarks or comments about the Company, which can be misconstrued and may have negative impact on the Company's brand.

- b. Refer to your employment connections with the Company in any personal communication in a way that could be interpreted, even by mistake, as a comment or endorsement by the Company.
- c. Use the internet or chat room forums to discuss Company related matters.

Example:

"I have a friend who is an editor in a business newspaper. He wants to cover our business model as he is impressed with our Company's progress. He has invited me to an informal discussion and as per him, he will write about our Company based on my inputs. I am excited that our Company will get positive media coverage."

You are not authorized to entertain such requests and your interaction with media on behalf of the Company will be a violation of the Code of Conduct. You should introduce your editor friend to the contact point in marketing communications function and they can take this forward.

USE OF COMPANY TECHNOLOGY

The use of Company assets for individual profit or any unlawful, unauthorized personal or unethical purpose is prohibited. Our information technology, intellectual property, facilities, equipment, machines, software, and cash may be used for only business purposes, including responsible and accurate expense reimbursement and in accordance with applicable policies. Other assets may be used for minor and incidental personal purposes provided such use is kept to a minimum, and does not create any significant incremental costs, interfere with work duties, or violate any laws or policies. The use of any resources for personal political activities is prohibited. Computer hardware, software, data, and facilities are valuable resources that need protection from potential destruction, theft, or misuse. These resources may also include confidential client information that requires safeguarding. It is your responsibility to prevent unauthorized access using ID badges, passwords, or other security codes, and physical security measures. Copyrighted materials should not be reproduced, distributed, or altered without permission of the copyright owner or an authorized agent. Software used in connection with the business should be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement and may be grounds for disciplinary action.

COMPENSATION AND BENEFITS

SALARY PROCESS

Your salary will be reviewed by the management from time to time. There is no obligation on the Management to increase your salary. Any increase awarded will be effective from the date specified by the management. A change to your salary is meritorious and is based on your performance. However, certain cases may be reviewed on a case-to-case base as per the management decision from time to time.

- a. The Company may, in its absolute discretion, pay additional remuneration to you, whether by way of bonus or incentives. Any such payment shall not form part of your salary for the purposes of this clause.
- b. Any salary and bonus entitlements shall be paid on pro-rata basis if you have not been employed throughout the whole of the financial year (April March). Company is not obligated to pay any bonus if your employment is/has been terminated or you are serving notice period.
- c. Any merit increase will be awarded purely based on individual performance and the Company performance.

Any queries concerning pay calculations should be directed to the Finance team.

• What are the statutory deductions applicable to my salary and do these reflect in my pay slip?

Statutory deductions that must be made in your pay include income tax, professional tax, and other deductions as applicable by Indian Income tax Act 1961, PT Act Tamil Nadu, PF/ESIC etc. These deductions are itemized on your pay slip, which shall be uploaded on the ESS by the Finance team once your salary is into your account.

What is the payroll process?

Payroll input is processed on the twenty-fifth (25^{the}) day of every month by the Finance team. The Finance team shall ensure that the pay slips reach the Associates on time. The salary shall be disbursed on the last working day of every month.

What is the process in case of an overpayment of salary?

Any overpayment of salary or other payments/recovery shall be adjusted in the following pay period. However, the Company reserves the right to deduct overpayments at any time from any monies owed to you or otherwise held for you or on your behalf by the Company.

• Are there any other deductions that are applicable to my salary?

The Company reserves the right, at any time during your employment, and in any event on termination, to make deductions from your salary for any damage or loss caused to the Company's assets or the property of any of its Associates or any overpayment made and/or other monies owed to the Company by you. This includes, but is not limited to, any excess holiday deductions, advances, etc., the cost of repairing any damage or loss to the Company's property caused by you, personal telephone calls, or any other actions causing monetary damage to the Company.

• What are the formalities related to tax computation on my salary?

Associates must declare their tax investment before May of the financial year for the financial year (April-March) to avail tax exemptions. Failure to do so will result in income tax being calculated at the full rate.

Bills/receipts in original shall be required to be submitted in January each declared through the declaration form in ESS. The dates for submission of the declaration form and bills/receipts will be communicated to Associates by the Finance team. The tax component shall be deducted monthly for remaining months.

ASSOCIATE WELFARE

Do we have cafeteria services at workplace?

Yes. The corporate and branch offices provide hot beverages to all Associates.

• What are the sports/recreation activities offered for Associates?

We recognize that you have multiple talents and, therefore, conduct regular sports, recreational activities, function get-togethers, birthday bashes, quizzes, cricket, and other cultural activities throughout the year. You are encouraged to be part of organizing and actively participating in these activities.

ASSOCIATE RELOCATION

The Company reserves the right to transfer any Associate from one location to another, to cope with business requirements, without prior consultation. Relocation means transfer/deputation/secondment of an Associate to another place of assignment due to business reason or a new Associate joining from another city/country, which in turn requires a change of residence. It necessitates transporting household belongings, fixtures, and the Associate's personal car to settle down in the new place. This provision is applicable to intra city/state transfers with significant distance between the present and new locations. The Company shall bear one time relocating costing involved as mentioned above.

To whom does this policy apply?

This policy is applicable to all existing Associates and new recruits within India.

• What are the re-location expenses that will be borne by the Company?

The expenses that will be borne by the Company are:

- a. Moving expenses
- b. Temporary accommodation reimbursement of re-location expenses would be considered on a case-to-case basis and approved by the Chief Financial Officer.

An Associate will be eligible for relocation expenses reimbursement upon submission of actual bills if they move intercity for a period of 15 days to one month. The amount reimbursement limits are as per their entitlements.

• If I request for a transfer due to personal reasons, will I be entitled to relocation benefits?

Transfers on individual's request will not be eligible for any relocation benefits.

• How much time do I have before I join?

For existing Associates, after arriving at the transferred/deputed location, you will have only two (02) working days before you are required to report for work. Time spent in travel will not be debited to your leave account. Any additional leave

required after joining the Company, will be considered on a case-to-case basis.

• Is there any recovery of my re-location reimbursements in case of resignation? Yes. If you resign within twelve (12) months from the date of joining at the new location, all transportation expenses and relocation reimbursement paid under this policy will be recovered in full, from your full and final settlement.

NIGHT SHIFT & ON-CALL ALLOWANCE

Night shift allowance (NSA) & On-Call Allowances are provided to recognize the contribution of Associates working in night shifts or scheduled as on-call from the office premises due to project requirements. You will be eligible to claim the allowances for the period/number of days you have worked. It will be paid over and above your annual compensation. Eligibility for payment will be based on attendance records. In case you move from night shift to any other shift, you will not be eligible for night shift allowance.

BU Head of the respective departments shall be responsible for sharing details of Associates working in night shifts and on-call monthly to the Finance team by the twenty-fifth (25th) of every month, which will be paid through that month's payroll. In case of any changes during the month, the same shall be informed to the Finance team. Any changes received on or after twenty-sixth (26th) of a month shall be processed with the subsequent month's salary.

What is a night shift under the NSA Policy?

Any shift that commences at or after 04:00 pm on any day and continues for eight hours shall be called a night shift.

• What is the amount payable as NSA?

To Night Shift Allowance, the shifts have been classified as:

- 1. Category1– Login hours from 4:00 PM to 11;59 PM and from 3:01AM to 5:59 AM for a full shift of eight hours.
- 2. Category2- Login hours from 12:00 AM to 3:00 AM for a full shift of eight hours.

For category 1, the night shift allowance shall be Rs.5000 (Rupees Five Thousand Only) per month.

For category 2, the night shift allowance shall be Rs. 8500 (Rupees Eight Thousand Five Hundred Only) per month.

These amounts shall be pro-rated to the actual number of days worked by you in night shift in a month.

If a person is paid for On Call Support, he/she is not eligible for Night Shift Allowance.

Example:

An Associate has worked between 26th November to 10th December and eligible for night shift allowance as per the calculation given below:

Total shift allowance for a month : Rs. 5,000/-

Days worked at night shift : 10 days (excluding 4 weekly offs)

Total no of working days in December : 21 days

Night shift allowance : 5000* 10/21 = Rs. 2,381/-

• What is the amount payable as On-Call Allowance?

To On-call Allowance, the shifts have been classified as:

- 2. Category1– Login hours from 4:00 PM to 11;59 PM and from 3:01AM to 5:59 AM for a full shift of eight hours.
- 2. Category2– Login hours from 12:00 AM to 3:00 AM for a full shift of eight hours.

For category 1, the on-call allowance shall be Rs.850 (Rupees eight hundred and fifty Only) per day.

For category 2, the on-call allowance shall be Rs. 1100 (Rupees One Thousand One Hundred Only) per day.

These amounts shall be pro-rated to the actual number of days worked by you in oncall schedule in a month.

PERFORMANCE MANAGEMENT SYSTEM

We aim to be an employer of choice – one where people want to work. As an organization, we are committed to giving all members of our team every opportunity to develop their careers, to contribute to our business and to share its success.

The Performance Management System is designed to support the completion of the work of the organization. It will also define, measure, and recognize the contribution of individuals and help the organization establish achievable goals for all its people – it is a team-based approach.

PERFORMANCE MANAGEMENT PHILOSOPHY

We believe that everyone who comes to work really does want to realize their potential and develop their relationships with others.

Work is characterized by feelings of satisfaction, frustration, opportunity, exasperation, stimulation, excitement and even feelings of fairness and dishonesty. To succeed and excel, we recognize that people need to know what is expected of them, what authority they have and how they are performing. In addition, the approach to managing them needs to be consistent.

If our organization can help its people feel more of the positive emotions and eliminate most of the negative ones, then we will have come a long way to be an employer of choice.

The Performance Management System is designed to be the foundation for fulfilling careers.

• How does the Company put the performance management system into action? The first step towards a successful performance management system is drafting key result areas (KRA) for each Associate.

All Associates will have SMART (specific, measurable, achievable, realistic & time bound) KRAs in an agreed format and amendments need to be approved by Management and used as the basis for performance appraisals. These are dynamic as deemed necessary by Managers.

• What is the process of allotting KRAs?

All Associates will receive individual briefings on their KRAs from their Manager.

KRAs will always be discussed in detail at job interviews and all new Associates are to be given a copy of their KRAs with their appointment offer, if required.

PROBATIONARY PERIOD REVIEWS

All new Associates are appointed with the intention of the placement being permanent unless otherwise stated in the appointment letter.

All new Associates will serve a six-month (06 month) probationary period to ensure that both the Company and the Associates are happy with a permanent commitment to the role. Managers should engage new Associates in informal performance-based feedback regularly and have specific meetings to discuss progress after the first (01^{st}) and second (02^{nd}) month, respectively.

Prior to the completion of the six-month (06 month) probationary period, new Associates will undergo a performance appraisal to provide feedback on performance, guidance on future direction and to set selected specific objectives for the next performance appraisal period.

• What is the objective of a probationary period review?

The objective of the probationary performance appraisal is to ensure that both the Company and the Associate are satisfied with the role as agreed and a recommitment to the permanent nature of the position can be made.

How is the successful application of the probationary performance appraisal determined?

The policy on probationary performance appraisals will be successfully applied when all probationary appraisals are completed within three (03) months of employment commencement.

What is the process of the probationary period review?

The Manager and the Associate will agree on the date for a performance appraisal meeting. In the case of all probationary period appraisals, this must be before the completion of three (03) months of service.

The Manager will prepare a written performance appraisal in the approved format and provide this to the Associate at least forty-eight (48) hours before the meeting.

The Manager and the Associate will meet and agree any objectives for the next appraisal period.

PERFORMANCE APPRAISAL

All Associates will undergo performance appraisals with their immediate managers on timing that is based on the level of their role. All performance appraisals will be timed from the date of employment commenced. This is to ensure performance management is a regular, rather than occasional management responsibility. Performance appraisals are separate from remuneration reviews.

• What is the objective of the performance appraisal process?

The objective of the performance appraisal system is to constantly monitor progress of the capabilities and achievements of Associates, to facilitate the on-going development of team members and to identify when an Associate has demonstrated readiness for greater responsibility.

The objective of individual performance appraisals is to review work performance based on both capabilities and achievement of specific performance objectives. Performance appraisals also provide feedback to the Company on the achievability of objectives and the capability of managers to manage their Associates.

How is the successful application of the performance appraisal process determined?

The policy on performance appraisals will be successfully applied when all Associates' appraisals are completed within the required time frames.

• What is the process of performance appraisal?

The Manager and the Associate will agree on the date for a performance appraisal meeting. This must be within the allowable period for each role. The frequency of performance appraisals is noted on position descriptions.

The Manager will prepare a written performance appraisal in the approved format and provide this to the Associate at least forty-eight (48) hours before the meeting. The Manager and the Associate will meet and agree any objectives for the next appraisal period.

PROFESSIONAL & PERSONAL DEVELOPMENT

In partnership with the Associate, the Company will maintain a professional and personal development plan for each Associate. The Company's role in this is as a supportive facilitator. It will be up to the Associate to take a leading role in managing their own development within an approved structure.

Funding for professional and personal development will be considered for support on its merits. The Company may, from time to time, require Associates to attend specific training or instruction delivered by internal or external facilitators. This may be on or off-site.

Development may take the form of training, education, mentoring, coaching, or counselling.

What is the objective of the professional & personal development?

The objective of the professional and personal development policy is to provide a structured environment for learning and development for the individual within and external to the Company.

How is the successful application of professional & personal development determined?

The policy on professional and personal development will be successfully applied when Associates are managing their own development plans.

What is the process of professional and personal development?

During the appraisal process, the Manager will identify and document areas in the Associate's performance which may be enhanced by further training. The Manager will identify specific courses where possible.

The Associate and Manager will then work together to complete a professional development plan for the Associate.

In response to this, the Associate can source their own solutions instead of, or in addition to, the manager's suggestions. Requests to attend these should be submitted in writing to the Associate's Manager and must include:

- a. suggested dates
- b. costs
- c. anticipated outcomes

The costs for the trainings provided by the Company (Training Costs) will be borne by the Company.

• Is there an option of availing reimbursement if I pursue a certification/training on my own?

Yes, the Company provides an option to reimburse costs in case you pursue a certification/training.

The Company encourages its Associates to pursue certifications, trainings, degree programs and other relevant courses (Certification) that are applicable and useful for their area of work/technology and help develop their skills. By way of support, the Company agrees to reimburse the costs incurred by the Associate in their efforts towards certification (Certification Costs).

What is covered under Certification Costs?

Certification Costs include professional/admission/semester fees paid by the Associate including examination costs. Late payment penalty is not covered under Certification Costs and will not be reimbursed.

• What is the process for reimbursement of Certification Costs?

a. In case you wish to get Certification Costs reimbursed, prior to enrolling for any Certification, you must discuss with your BU Head and Delivery Head about your desire to attend such Certification and the cost involved. The Delivery Head should consider the relevance and criticality of such Certification to your area of work/technology and the Certification Cost to decide if the Certification Cost should be reimbursed. Such approval from Delivery Head must be obtained in writing.

- b. You must complete and sign the certification fee reimbursement form in the prescribed format. This form must be submitted to the Finance team with a copy of the written approval from the Delivery Head.
- c. To avail reimbursement of Certification Cost, you must provide all supporting documentation regarding payment of professional fees and course completion.
- d. The decision of the Finance team about the sufficiency of supporting documents submitted for reimbursement shall be final. You may be asked to provide additional documents. Upon approval from Finance team, the amount will be reimbursed.

• Is there any recovery of Training Costs or Certification Costs in case of resignation?

Yes. The Company agrees to incur or reimburse Training Costs or Certification Costs on the presumption that such training/certification will be mutually beneficial to you and the Company.

Therefore, you must either continue providing services to the Company for a specific duration or refund the Training Costs/Certification Costs incurred/reimbursed by the Company.

The duration for which you need to continue providing services to the Company will depend on the amount of Training Costs incurred or Certification Costs reimbursed. Also, the duration of services will be calculated either from the date of completion of training (in case of training provided by the Company) or from the date of signing the certification fee reimbursement form (in case of reimbursement of Certification Costs). To this policy, the amount of Training Costs/Certification Costs and the corresponding duration of service will be as follows:

Training Cost/Certification Cost	Duration of Service
Less than Rs. 50,000	Six (6) months
Rs. 50,001 - Rs. 80,000	Twelve (12) months
Rs. 80,001 - Rs. 120,000	Eighteen (18) months
Above Rs. 120,000	Twenty-four (24) months

If you resign before completion of the duration mentioned above, all Training Costs/reimbursed Certification Costs paid under this policy will be recovered in full, from your full and final settlement.

GENERAL REIMBURSEMENT

BUSINESS MEETING EXPENSES

Can I claim expenses incurred towards business during my travel?

This type of expense is called "Business Meeting Expense" during domestic/overseas travel. It refers to the amount spent on food, beverages, and associated functions you spend on another person - Associate or business contact. The following points are to be observed related to business meetings:

- a. Business meeting cannot be helped or attended if it creates a sense of obligation, thereby breaking the Code of Conduct.
- b. Expenses on business meeting must be reasonable both in terms of time and amount spent. The test of reasonableness is left to the Associate/Manager concerned.
- c. Business meetings should have a business purpose. The business benefit of incurring the expense should be demonstrable, if required.
- d. These expenses should be kept to a minimum depending on business needs. The guests entertained must be identified.

Who can claim these expenses?

The senior-most Associate available at the business meeting is required to spend money on 'Internal and External Business Meetings' and claim the same.

ASSOCIATE INSURANCE

To provide comprehensive financial support during the time of unforeseen events, all Associates of the Company are covered under the following two types of Associate insurance policies:

- a. Group Personal Accident Insurance All Associates shall be covered under Group Personal Accident Insurance policy from the date of joining.
- b. Medical Insurance The Company provides a medical insurance for the Associates on completion of probation.

TRAVEL & ACCOMMODATION POLICY

Domestic

All staff should adhere to the travel and accommodation policy when travelling on Company business. The Company recognizes that business travel is an inconvenience and seeks to make such inconvenience more comfortable at a cost that is appropriate for the Company's size and cash flows.

What do I do to request for business travel?

All travel requests should be raised through travel request form. It will require approval from your manager. Please mention the purpose of the travel very clearly in the form.

What mode of transport am I entitled to use?

The mode of travel and conveyance will be decided by the BU Head and approved by Finance team.

• Who can assist me with my travel bookings?

Associates can directly submit the travel requisition to the Finance team, duly approved by the Manager. Once approved, the Finance team will book your ticket.

How can I claim my travel expenses?

All expenses incurred in connection with official work must be submitted to the Finance team. The supporting vouchers should be forwarded to the Finance team for settlement within seven (07) working days of your return from tour. The payment shall be made in the next payroll cycle only once the supporting vouchers are validated.

What is the eligibility for official local conveyance reimbursement?

You are eligible for a reimbursement for a two-wheeler, or a four-wheeler or actual auto/cab expenses incurred on official travel. However, the claim needs to be approved by your Manager. Expenses incurred on travel for official purpose are eligible for reimbursement.

What will the mode of travel be?

Journey is to be undertaken by the most optimal mode of transport and by nearest route. Journey by air/taxi is to be permitted upon approval by BU Head beforehand unless permitted per travel policy.

Under no circumstances shall the Associate's personal vehicle be used for outstation travel.

What will the class of travel be?

- a. Train 2AC/Sleeper class where night journey is involved.
- b. Where distance is less than 50 kms within the city limits personal vehicle may be used.
- c. Bus For overnight journey: Sleeper class, Volvo/Aira vat. Day journey Super deluxe/Aira vat.
- * Finance team will assist in booking the tickets wherever possible.

What are the guidelines regarding submission of bills?

Original train/bus ticket must be submitted in support of having undertaken journey along with the travel allowance form. Travel allowance will be paid for the actual expenses/fare incurred.

Where an Associate undertakes the journey in the vehicle provided by the Company, no travel allowance is permissible.

Travel allowance form is to be submitted within three (03) working days from the date of completion of travel. Company reserves the right to reject the travel allowance claim for delayed submission of bill.

• What authorization is required to process the travel allowance?

Travel allowance claim is to be authorized by the BU Head within two (02) days from the date of receipt of claim duly scrutinizing all aspects of the bill and forward it to the Finance team. Finance team will sanction and settle the bill in the next payroll cycle.

Is journey by air permitted?

Journey by air may be permitted where the distance is over 500 Kms with prior approval from the BU Head. Such journey is to be by economy class and through low-cost airlines.

All airlines booking should be done online (MakeMyTrip/Airlines portal) as soon as the travel program is finalized, and any last moment bookings should be avoided.

Finance team will assist in booking the tickets wherever possible/required. No booking is to be done through travel agents.

Who bears the ticket cancellation charges?

At the instance of Company, cancellation charges are to be borne by the Company.

At the instance of Associate, cancellation charges are to be borne by the Associate.

What are the guidelines regarding lodging?

To provide a resting place where overnight stay participates in connection with official duties, the BU Head is to permit the stay in a hotel.

You must take note of the check-in and check-out timings of the hotel carefully. Company will reckon 24 hours from the date of occupation as one day. Where the check-out and check-in timings of the hotel are different and you intend to vacate by evening, you can check out during morning hours itself while going for work & keep the luggage in the cloak room.

If two or more Associates are travelling together, they are encouraged to share rooms and one of the Associates may claim the hotel expenses.

• What is the food allowance paid by the Company?

Associates are eligible to claim their food actual bill if it is within the amount for which they are entitled.

- a. No liquor bill will be reimbursed.
- b. Any miscellaneous expenses without bill is limited to Rs 100 per day only.

• What is the amount provided by the Company for local conveyance while on business travel?

Local conveyance is provided to meet the expenses incurred while commuting for official works in the city of work location.

Local conveyance is not meant for regular travel to office.

Associates are encouraged to use public mode of transport within city of work location and as far as use Metro and Local Bus Transport facilities.

However, Associates may use personal car or two wheelers/auto for visiting clients. Use of taxi within the city to be avoided unless otherwise required, in case Associate uses his/her own vehicle (two wheelers) following is the method of calculation of expenditure:

- a. Two-Wheeler Rs.3.50 per km
- b. Four-Wheeler Rs.9.00 per km

When two or more Associates go to one work location, only one of them shall claim auto fare as they are required/expected to undertake journey together.

International

Whom do I contact for assistance to book tickets?

All ticket requests are raised through the prescribed form; the same will be duly approved by the CEO of the Company. The Finance team will send your tickets. The Company shall make all travel arrangement. In case you incur expenses towards air travel, the same will be reimbursed on approval.

How do I get my overseas travel advance?

The required advance, if applicable, may be requested from the Finance team at least one week in advance from the date of travel. The same will be provided on approval.

- What is the eligible mode of travel for overseas business visit?
 Economy in budget airline.
- What are the modes of local transport during the overseas visit?

During your time at the overseas location, you are encouraged to use Metro/Tube/Train/Rental Cars whichever is efficient and safe for all your local travel.

• Can I stay in my friend/relative's house while I am on business tour?

Yes, you can stay with your friend /relatives. You will be paid a flat allowance.

Can I claim expenses related to food, beverages, stay and other incidental expenses?

Yes, you will be paid a fixed daily allowance as per your eligibility.

What will be my per diem during business travel?

Per diem is paid on a *per calendar day* basis. The amount of per diem is decided based on the project, the client, and the purpose of the business visit. You will be eligible for per diem from the date of arrival at the business location to the date of departure from the business location.

No. You will be provided with a preloaded forex card depending on your eligibility and the duration of stay at the location. Direct payment to the vendors/service providers will be made by the Company through cheque/ bank transfers. In exceptional cases, the Associates can use their personal credit card and get it reimbursed by the Company.

What about visa/insurance expenses?

Expenses of visa/insurance on all official overseas travel will be borne by the Company. You are required to furnish necessary documents required for visa processing within the stipulated time.

- What is the guideline on telephone expenses during my overseas trip?
 You can use the official handset (with matrix sim card) or can claim official telephone expenses.
- What if I require entertaining official business partners/customers during my travel?

 All expenses incurred towards official entertainment shall be reimbursed at actuals and shall be exclusive of the per diem allowance as per your eligibility.
- What is the maximum time that can be taken to settle travel expenses?

 For all types of travel, you should settle the travel expenses within seven (07) business days. Any reimbursement due for you by the company will be settled in the next payroll cycle

MOBILE CONNECTION

What are the guidelines related to mobile connection reimbursement?

The Company provides and directly pays for all mobile connections and data cards provided to you for business purposes. In the rare scenario that a reimbursement is required, you can submit the e-receipt to the Finance team and claim reimbursement.

PROMISE TO OUR CUSTOMERS, VENDORS & SUPPLIERS

QUALITY POLICY

Our objective is to provide customers with high quality of service and meet their requirements in a timely and cost-effective manner. We also aim to enhance customer satisfaction through effective application of the system, including processes for continual improvement of the system and the assurance of conformity to customer and applicable regulatory requirements. Our commitment to quality is vital to all we do.

INDUSTRIAL ESPIONAGE

Our commitment to fairness includes respecting the rights of our competitors and abiding by all applicable laws. As a lawful competitor and to help ensure the integrity of the competitive marketplace, we must respect our competitors and take care that we do not misappropriate or unlawfully use the information, material, products, intellectual property, or proprietary or confidential information of anyone including suppliers, customers, business partners or competitors.

GOVERNMENTAL RELATIONS

While all our clients are treated with respect, we should be especially careful while dealing with government clients. There are significant penalties in many countries, including debarment and monetary penalties for organizations that fail to follow the law while working for government clients. The principles set out in 'Preventing Corruption' must be strictly followed by all who interact with government officials especially with respect to gifts and entertainment. We should not attempt to influence

government Associates in any manner other than what is agreed in our contractual arrangement with the government. We should not initiate discussions for any contract with any business in which a government official or Associate holds a significant interest, without the prior approval of the CEO.

SELECTING SUPPLIER & VENDORS

The Company's suppliers make significant contributions to our success. We strive to create an environment where our suppliers are confident that they will be treated with respect. We select our significant suppliers or enter into significant supplier agreements though a competitive bid where possible.

ASSOCIATE SEPARATION

RESIGNATION, TERMINATION & RETIREMENT

• What is the Company policy on resignation?

If you decide to withdraw your services from the Company, a formal letter or email of resignation must be submitted to your manager. Only if the resignation is accepted, you will be relieved from your services. The Company properties should be handed over to the Manager on your last working day. You will be relieved from the Company subject to "no dues" clearance from all functions. You must also fill the Exit Feedback Form and submit it to the PX team.

Please note that the Manager needs to inform the PX team about any Associate resignation from services immediately. Also, the acceptance/rejection of resignation must be intimated to the concerned Associate and to the PX team.

The following is the responsibility table for the activities involved immediately upon resignation.

Steps	Action	Responsibility
1	Send resignation acceptance email with details of notice period & last working date	PX Team
2	Communicate details of exit to Finance, IT, Admin & P – Delivery	PX Team
3	Transfer knowledge of work managed by the exiting Associate	Exiting Associate

What is the company policy on notice period?

The contractual notice period for leaving the services of the company is three (03) months for all confirmed Associates in all levels. Any exception to this shall be only at the sole discretion of the CEO. Associates are not entitled to avail any kind of leave during the notice period. It is at the discretion of the CEO/PX team to grant leave. If any Associate absents or applies for leave during the notice period, the days of absence shall not be counted for computation of the notice period.

• Can I be dismissed from services?

Performance - The Company shall have the right to terminate your employment any time, with or without notice for any poor performance or if you at any time render yourself incompetent to perform your duties, by giving one (01) months' notice.

Discipline/Misconduct - In case of misconduct, disobedient, intemperate, irregular in attendance, commit any breach of code of conduct/company policy or the terms of your employment contract, the Company shall, without prejudice to any of its rights, be entitled to terminate your employment forthwith without notice or payment in lieu of notice and to deduct from your salary or other emoluments, if any due to you, the amount of any damage the Company may have sustained.

• What is the retirement age?

Retirement age for all Associates is 58 years. The age in the birth certificate/school leaving certificate submitted by the Associate at the time of appointment shall be considered as final for determining the retirement date. The Associate shall be relieved on the last working day of the month in which he/she was born.

• What are the details of the exit process?

In case your resignation is accepted, you will require a "no dues" clearance from your Project Manager, PX and Finance, Administration, and IT Function on the last working day. Also, you must return any company assets entrusted to you before you are relieved. You will be a relieving letter from the Company when exit is completed in all aspects and there are no dues pending on the last date of work. You will receive the full and final settlement within thirty (30) days from the last working date.

The following is the responsibility table for the activities involved on the relieving/last working date.

Steps	Action	Responsibility
1	Prepare relieving letter (2 copies)	PX Team
2	Send email for confirmation about completion of knowledge transfer	PX Team
3	Deactivate/reset access to client email logins, VPN logins, RSA Token & client environment	Tower Head/Reporting Manager
4	Email to system admin team to deactivate access card time sheet portal & email.	PX Team
5	Deactivate access card, time sheet portal, email, GIT login & domain	System Admin Team
6	Return laptop, data card, mobile phone, IT accessories & IT card	Exiting Associate
7	Submit IT declaration & proof, settle any loan/monetary balances	Exiting Associate
8	Complete time sheet for last working day.	Exiting Associate
9	Fill-in the Associate Exit Clearance Form, obtain signatures from required teams & submit the form to PX Team	Exiting Associate
10	Conduct exit discussion with the Associate.	PX Team
11	Complete the exit interview questionnaire	Exiting Associate
12	Handover relieving letter to the Associate	PX Team

What are the conditions on salary disbursement during notice period?

Salary for the first month of the notice period shall be disbursed along with the full and final settlement only for all resigned Associates. Salary for the second and third months of the notice period will be paid in the respective payroll cycle.

The Associate will be eligible to receive the variable component only if he/she is active on the payroll of the Company as on the date of the pay-out.

COMPENSATION IN LIEU OF NOTICE PERIOD

Employment may be terminated by either party giving one (01) month notice in writing or one (01) month basic pay in lieu as per the last drawn gross salary (excludes Variable Pay or Sales Commission) specified in the appointment letter and amendments from time to time.

Compensation in lieu of notice period will be paid or recovered as per the appointment letter terms and conditions.

LEAVE DURING NOTICE PERIOD

No leave or sponsorship for training and development programs is allowed during notice period. However, leave based on merits and within reasonable limit shall be provided. The respective BU Head in consultation with the PX team shall sanction all approvals.

EXIT INTERVIEW & WORK HANDOVER

You should ensure that you complete the work and knowledge transfer formalities as per the guidance of your manager before the last working day.

What is the purpose of exit interview?

The purpose of the exit interview is to capture the valuable feedback from the exiting Associate and help understand and assess what should be improved, changed, or remain intact in the organization.

Who will conduct the exit interview?

The representative for conducting the exit interview shall be a member of the PX Team.