

**AventIQ, a trademark of Mittal Software Labs Limited**  
**Policy on Background Verification**  
**Confidential and Restricted**

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## **Objective**

AventIQ, a trademark of Mittal Software Labs Limited is committed to ensuring a trustworthy and compliant workforce. This policy outlines the procedures for background verification checks to safeguard the interests of the Company, its employees, and its clients. Background checks are conducted in adherence to applicable Indian laws, with respect for individual privacy and confidentiality.

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## **Scope and Applicability**

### **Coverage:**

This policy applies to all individuals engaged with AventIQ, a trademark of Mittal Software Labs Limited, including:

- Permanent employees (probationary and confirmed).
- Interns (paid or unpaid).
- Temporary and contractual employees.
- Consultants and independent contractors.
- Employees on the rolls of subsidiaries or group companies.

### **Timing of Checks:**

Background verification may be conducted at the time of hiring, during employment, or at any point deemed necessary by the HR department.

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## **Definitions**

- **Background Verification (BGV):** A process to verify an individual's credentials, including education, employment, address, statutory documentation, and criminal records.
  - **Candidate:** Any person under consideration for employment or internship.
  - **Verification Partner:** Third-party agencies authorized by the Company to conduct background checks.
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## Policy and Procedures

### Types of Checks

1. **Educational Qualifications:** Verification of academic credentials and certifications.
2. **Address Verification:** Confirmation of current and permanent residential addresses.
3. **Employment History:** Validation of previous employment details, if applicable.
4. **Statutory Documentation:** Verification of documents like PAN, Aadhaar, or passport.
5. **Criminal Records:** Review of any criminal history.
6. **Medical Tests:** General health assessments (if applicable).
7. **Drug Tests:** Conducted based on job-specific requirements with prior consent.

### Definition of Negative Report

A **negative report** during background verification refers to discrepancies, irregularities, or adverse findings that raise concerns about an individual's suitability for employment.

Examples include:

- **Educational Discrepancies:** Mismatch in qualifications, falsified certificates, or incomplete credentials.
- **Employment History Issues:** Fabrication of past work experience, unverified references, or undisclosed terminations.
- **Criminal Background:** Record of criminal offenses, pending cases, or history of fraud/misconduct.
- **Address Mismatch:** False or unverifiable residential address provided by the individual.
- **Statutory Documentation Issues:** Invalid or fake identity documents, such as PAN, Aadhaar, or passport.
- **Medical or Drug Test Failures** (if applicable): Positive drug test results or medical conditions deemed unsuitable for specific roles.
- **Uncooperative Behavior:** Failure to provide necessary documentation or refusal to participate in the verification process.

Negative findings may result in actions such as revocation of job offers, termination of employment, or cancellation of internships, depending on the severity and context of the issue.

### Process

**Pre-Hiring:**

- HR informs candidates that background verification is mandatory.
- Written consent must be obtained from the candidate before initiating checks.

**Post-Offer:**

- Background verification is conducted before onboarding. In case of adverse findings, the offer may be revoked.

**For Current Engagements:**

- Verification may be initiated if necessary, such as for promotions, role changes, or suspicion of misconduct.

**Adverse Findings Appeals**

- Individuals will have an opportunity to contest adverse findings by submitting clarifications or supporting documentation within **7 working days** of notification.
- Appeals will be reviewed by HR, and outcomes will be communicated within **14 working days**.

**Vendor Management**

- Third-party verification partners must sign data protection agreements to ensure compliance with applicable Indian laws, including the Information Technology Act, 2000 and the Personal Data Protection Bill, 2019 (if enacted).

**Confidentiality**

- All background verification information is handled with strict confidentiality, adhering to applicable data protection laws. Data access is restricted to authorized personnel only.

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**Non-Compliance and Consequences****Adverse Findings**

- HR, in consultation with the Hiring Manager, will determine further action, including withdrawal of an offer, termination of employment, or cancellation of an internship.
- The individual will be given an opportunity to provide clarifications or supporting documentation.

**Failure to Cooperate**

- Non-cooperation with the verification process may result in immediate disqualification from consideration or termination of engagement.
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### **Special Provisions for Interns**

- Interns are required to undergo verification of educational qualifications, address, and statutory documentation.
  - Criminal background checks may be conducted for roles involving sensitive information or operations.
  - Drug tests are generally not applicable unless mandated by the client or role requirements.
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### **Legal Compliance**

This policy complies with all relevant Indian laws, including:

- The Information Technology Act, 2000.
  - The Indian Contract Act, 1872.
  - The Employment Exchange Act, 1959 (if applicable to interns).
  - The Personal Data Protection Bill, 2019 (or any enacted equivalent).
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### **Storage and Retention of Verification Data**

- Background verification records will be stored securely for a period of **five years** from the date of collection.
  - Data will be deleted or anonymized upon completion of the retention period unless required for legal or compliance purposes.
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### **Review and Amendments**

This policy is subject to periodic review and may be updated to reflect changes in laws and organizational requirements. Employees and interns will be notified of any significant changes.

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**Approved By:** Nikhil Mittal

**Effective Date:** 01-Jan-2025

**Last Updated:** 26-Dec-2024