



## EMPLOYEE POLICY HANDBOOK



## ABOUT THIS EMPLOYEE HANDBOOK

This Employee handbook (the “Employee handbook”) is designed to introduce an employee to “**RAF Solutions LLP/ HealthcareNLP.**” (Hereinafter, referred collectively as “the Company”) and the operating philosophies, guiding principles that drive our current and future successes. It also aims to guide an employee on the benefits of working with the Company and the policies that govern our work conduct at **RAF Solutions LLP/ HealthcareNLP.** This handbook is not intended to cover all informal policies and procedures; it is an employee’s responsibility to be familiar with such policies, procedures related to the job scope and to keep abreast on policy updates.

The information contained in this handbook applies to all permanent, full-time and part-time employees employed across all **RAF Solutions LLP/ HealthcareNLP.** This handbook is intended to complement (but not replace) the contractual agreement in an employee’s contract of employment.

This employee handbook supersedes all previously issued handbooks. From time to time, the company may change, modify, suspend, interpret, or cancel at any time, any terms contained herein, in whole or in part, without having to consult with or obtain agreement from the employee. The company also reserves the right to make decisions involving employment as needed in order to conduct its operations in a manner that is beneficial to the employees and the company in compliance with all relevant legislation.

*As company policies change, updates will be communicated. Information in this handbook should be kept confidential outside of the workplace. An employee may contact the reporting manager or human resource point of contact for any questions and clarification relating to the handbook.*

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## 1. Office Timings & Attendance Policy

### SHIFT SCHEDULE & TIME

Shift timings for employees are defined as given below:

Schedule Months	General Shift Time	Working hours	Core Business Hours
January to December	10:00 AM TO 07:30 PM	9.30 HOURS	10:00 AM TO 12:00 PM

- **Total working hours** - All employees in the company are required to work for a total of 9:30 hours including lunch, tea and personal breaks.
- **Break timings** - Employees are allowed to take 60 minutes of total breaks (including lunch/Tea/Snacks). All employees are required to complete the 8.30 hours of daily productive time.
- Shift timings of all departments are planned keeping business demands and deliverables in mind to support continuity of operations. All employees are required to report to office as per the shift time allotted to them. However, based on the client, projects and business needs few departments may decide to follow customized shift timings
- Line managers may plan break timings and patterns for respective employee, team as per their shift timings and work deliverables to ensure the business continuity and seamless operations. Employees should ensure that they respect and abide by the break timings, pattern mutually agreed with the reporting manager. However, all employees must complete 8.5 hours of daily productive time on the floor excluding all breaks and in case of half day working 4.25 hours of daily productive time on the floor excluding all breaks.
- Employees are required to keep reporting managers informed and take necessary approval about their in or out of office movements other than the normal break timings. In case any employee is found taking extended breaks frequently without prior permission, would lead to disciplinary action against the concerned employee. In case of employees of working from home "being present" means they should be available online and respond to the other team members quickly

### LATE COMING AND EARLY GOING FLEXIBILITY:

- Generally, employees are expected to report to duties on time. However, employees work across multiple time zones to support clients spread across different geographies. This requires employees to work in different shifts and also work extended timings depending on client needs, project deliverables. Hence, we believe in extending necessary flexibility in reporting time to employees who work for extended hours during their shift timings. Depending on the duration of extended working hours on the previous day, the concerned reporting manager may allow flexibility in reporting time for the employee who had stayed back to meet work exigencies. It should be noted that such flexibilities are only extended on need basis. Other than

work exigency cases, all employees are expected to continue reporting on time as per the assigned shift on daily basis.

- However, it should be noted that irrespective of in-time, all employees are required to complete a total of 9.30 hours working for each day.
- E.g., In case of employee has come at 07:15 AM, he/she will be required to stay back in the evening to complete the required 9:30 hours of working and can leave by 4:45 PM.
- If any particular employee has been found coming late habitually, necessary disciplinary action would be taken by reporting manager in consultation with the HR POC. In any given situation employees must complete required working hours to claim full day or half day working.
- Reporting managers would ensure that employees requesting for late coming or early exit follow the guidelines as mentioned in the policy and also ensure appropriate action is taken in consultation with HR POC against defaulters.
- In case of emergency, if an employee is coming late he/ she should take necessary approval from his reporting manager and they need to update into the central working group.

## 2. WEEKLY OFFS

All Saturdays and Sundays are observed as a fixed weekly off for all Employees.

## 3. COMPANY PAID HOLIDAYS

In order to support employees to spend quality time with their family during selective festivals and public holidays, the organization provides 11 days holiday during the Calendar year i.e. 1st January to 31st December to all the employees working in india office.

- Every year HR POC would announce a list of Fixed Holidays for the Calendar year. **(As given in Annexure I for the year 2022)**
- List of Holidays for the coming year would be made available to employees in the month of every December.

Looking at client operations and business holidays have been bifurcated under “**Fixed and Optional Holiday**”

### Procedure for Applying for Optional/ Flexible Holidays

Employees should plan their optional/ Flexible holidays in advance and let the concerned manager know about their holiday plans. Employees should discuss the Optional/ Flexible Holiday plan in advance with manager and take necessary approval before applying for the same in HRMS system. This would ensure that reporting manager can effectively manage resources planning without affecting business continuity. On all Optional/ Flexible holidays, reporting manager should ensure required number of staff is available to support business operations and deliveries. Keeping the business exigencies in mind, some employees may be asked to reschedule their Optional/ Flexible

Holiday request to a later date. In case of any dispute, decision from HOD in consultation with HR should be considered as final.

All Optional/ Flexible Holiday requests should be submitted at least 10 days in advance and employee should take necessary approval before proceeding on holiday. However, if an employee is asked to work on any fixed holiday OR Pre-Approved Optional/ Flexible Holiday, he or she would be eligible for Comp off as per company's Comp-Off policy.

In cases of business exigencies if an employee is being asked to work on a pre-approved optional holiday/flexible holiday then he/ she may reschedule or reapply their optional holiday to some other holiday from the list of optional holidays. However, if they end up working on pre-approved optional holiday, then they would be eligible for comp off as per company's comp-off policy.

#### 4. WORK FROM HOME POLICY

The objective of the work from home policy is to ensure that employee working from home is beneficial to the employee and the company. This policy allows employees to maintain a healthy work-life balance and improve employee productivity.

The work from home policy temporary or permanent applies to all our employees who prefer working from home in times of need. However, an employee's working from home request will be considered on a case to case basis. Approval of work from home request is based on job duties, prior performance, and productivity.

##### **Responsibilities:**

The supervisor is responsible for ensuring that the terms and conditions under the work from home policy have been satisfied prior to approving the request. It is the responsibility of the employee to adhere to all the company's policies and procedures even when working from an alternative location.

Additionally, employees must maintain accurate and up to date records of hours worked at home within a normal span of productive hours and submit to the reporting manager. The employee is expected to be contactable and available for communication with the reporting manager/HR and team members during the periods in which home-based work is carried out.

Depending on the job duties assigned, employees are allowed to work from home. Employees who need to be in direct physical contact with clients and customers might not be eligible to telecommute under this policy. Similarly, maintenance and support staff are exempted from this policy. However, employees working from their work stations with the help of computers can avail the benefit of this policy. This is only possible if the employee must get his/her work from home request approved by his/her reporting manager.

Before approving a request, managers must consider the fact that all employees are different. Some employees may not be productive in work from home setup. Therefore, managers must ensure that the productivity of the employee does not waiver in work from home arrangement. If

need be, they can set clear targets to be achieved by the employee for the duration of work from home.

**Scope:**

Work from home arrangements can be occasional, temporary or permanent, the decision of which is taken at the time of the interview and included in their appointment letter. If the work from home arrangement spans for more than a week, managers and team members should meet to discuss details and set specific goals, schedules and deadlines for the work.

**Employees can work from home,**

- Full-time
- On certain days of the weeks/months, dividing their schedule between being present at the office and working from a remote location
- Every day, dividing their schedule between being present at the office and working from a remote location.

**Employees can request for work from home for reasons that include but not limited to:**

- Parenting
- Bad weather
- Emergencies
- Medical reasons
- Work-life balance
- Long commute

**Things To Keep In Mind:**

- Different employees and roles have different responsibilities based on their job description. There are chances some of the employees will have access to confidential data about the company. Thus, it becomes critical for the employee and especially the reporting manager to consider the impact on the company for such employees to work from home.
- Before asking and approving work from home request, employees and managers must consider the below concerns:
  1. Is the employee eligible for work from home by the nature of his job description?
  2. Are there any cybersecurity and data privacy concerns?
  3. Is the home-based worksite a safe area to work?
  4. Will the employee's work from home in any way affect his/her team output?
  5. Does the employee have the necessary software installed and permissions granted to operate official portals from home?
  6. How strong is the internet connection, noise control at the employee's home or alternative place of work?
  7. In case of issues arising at the preferred place of work, can the employee come to the office?

**Approval Procedure:**

When employees plan to work from home, they must email their request or raise it at the appropriate Human Resource Information System (HRIS). It is up to the manager to approve the same after considering all the aspects mentioned above.



There could be chances that the reporting manager and the employee are in different time zones. When employees need to work from home for unforeseen reasons, they may not be able to get their requests approved in time. In this case, they may work from home and notify the HR department. They must check in with their managers as soon as their manager clocks in.

#### **Mutual Understanding:**

Managers can set guidelines that ensure employees work at their optimum level. The employee and the supervisor must decide how often they need to catch up to ensure that all the goals and targets are met. They can even consider scheduling weekly meetings. Managers must provide straightforward guidelines to ensure employees know what to do in their new work environment.

#### **Compensation And Benefits:**

In most cases, work from home arrangements doesn't affect employees' employment terms. HR will include the clause in the employees appointment letter in case if the employee is hired working from home has any effect on compensation and benefits.

## **5. COMPENSATORY OFF POLICY**

#### **Compensatory Off Against Working on Weekly Off and Paid Holidays**

Compensatory Off is allowed to all employees who work on weekends and Public holiday due to business exigency or special circumstances arising out of client deliverables.

Employees are required to take prior approval from reporting managers for working during weekends and holidays.

#### **Eligibility to claim Compensatory - Off against extra working**

In order to claim a compensatory off

#### **Full-Day Compensatory off:**

In order to claim for "Full day compensatory off", the employee should work for 6 hours on weekly off, paid holidays or extended hours on weekdays.

#### **Half-Day Compensatory off:**

In order to claim half-day, an employee must have work for 4 hours on weekly off, paid holidays or extended hours on weekdays.

Employee cannot accumulate more than 12 comp off at any given point in time and are not cashable.

Compensatory off should be availed within 45 days from extra working. Compensatory off's can't be accumulated nor can be carried forward beyond specific time as mentioned above and would be considered as "lapsed."

#### **Process for applying Compensatory-Off**



Employee wanting to apply for compensatory-off should first discuss with the reporting manager. Only after necessary discussion and agreement with reporting manager, employee should submit formal Compensatory Off request via HRMS system.

Such email request should be submitted at least 1 week in advance from the date when Employee is actually planning to avail compensatory-off.

Employee should take formal approval from reporting manager via HRMS System before proceeding on compensatory-off and same should be sent to HR POC for information and records.

Employee should take a note that final decision for approval of compensatory-off would rest with concerned reporting manager who would duly evaluate operational priorities, resource availability and any critical business milestone before approving compensatory-off. However, the idea is not to restrict or deny this right to employee but to ensure there is a mutual understanding towards organizational priorities and employee's time off plan. In case of any dispute, decision of reporting manager in consultation with HR POC would be considered final.

## 6. LEAVE POLICY

In the interest of maintaining a healthy work-life balance, the company offers Leaves to all eligible regular employees. Employees have opportunities to enjoy time away from work to help balance their professional and personal lives. The company encourages all employees to spend time with family, taking care of personal work or rest due to medical reasons.

### PRIVILEGE LEAVE

#### Entitlement:

- All full-time employees are entitled to **18 Days Privilege Leaves** during the Financial year i.e. 1<sup>st</sup> April to 31<sup>st</sup> March on a pro-rata basis.
- Employees in the probation period would not be eligible for privilege leaves.

#### Eligibility:

- Full-time employees will be credited with 1.5 PL in his/her account at the beginning of the month post probataion upon successful confirmation.
- If the employee joins after 15th of a specific month, he/she would not be eligible for the PL in reference to that particular Month.

#### Accumulation & Encashment:

- Organization believes employees should utilize their leaves by planned time offs and vacations. Hence, Employees are expected to utilize their annual Privilege leave balance before the end of the financial year.
- However, the Organization understands that on practical grounds it may not be possible for employees to utilize all PL balance before the end of the financial year. Hence to provide sufficient flexibility in utilizing leaves, employees may decide to carry forward PL balance up to a **maximum of 9 days** during the financial year changeover.

- Employees should **minimum utilize the 9 PL's** in a Leave Cycle year (Between April to March). If not used, they will be lapsed and will not been-cashed or carry forwarded.
- Every employee would have maximum **Leave encashment cap of 12 PL** every year.
- At the time of voluntary separation, employee's closing PL balance would be paid as part of the full and final settlement after fulfilling all clearance formalities. This is applicable only for employees who have served the organization for more than a year.
- Encashment of PLs at the time of separation would be paid on the basis of **last basic salary** earned by an employee and who completed 1 year of service as on 31st March of that leave cycle
- Please note that accumulated leaves cannot be utilized to reduce or adjust the notice period to be served at the time of resignation.

#### **Procedure to Apply:**

- Employee must apply for a leave application in the HRMS portal at least 1 week in advance for reporting manager's approval. All type of PL applications would require prior planning and advance approval from the reporting manager to ensure continuity of work in the concerned department. This would allow reporting managers and management to plan appropriate backup resources to ensure continuity of business activities.
- Reporting Manager can approve or disapprove leave based on business exigencies in HRMS.
- **Leave approval and intimation process:** When applying for privilege leave, Employee needs to inform 1 week prior to avail 1-3 days' 2 weeks prior for 3-7 days planned leave, 4 weeks prior for 7-10 days planned leave. **Not more than 10 working days of consecutive leaves will be allowed.** Only emergency situations will be entertained for last minute notice (less than a week prior to taking leave)
  - An employee should be available on the phone so that he/she can be contacted in case of any urgency.
  - However, employees are allowed to apply for leave before and after Holidays. PLs applied before and after Holidays would not be counted as sandwich leave.
  - It should be noted that if Leave without Pay (LWP) is applied before and after weekly off and Holidays then the total duration including weekly off and Holidays shall be counted as LWP.
  - Privilege leaves (PL) accumulated by an employee can be utilized for planned vacations and time offs. It is strongly recommended that such leaves should be planned in advance keeping work exigencies in mind. Concerned reporting manager/Operations head/HR POC should be informed in advance for such planned vacations to ensure suitable backup, business continuity is planned.

#### **Following examples would help the right interpretation of this policy:**

As on 31st of March 2022 employee has total PL **"Carry forward balance"** of 9 days and during the entire year 2022, the employee earned 18 days PL as **"Current year balance"**. During the year employee **utilized only 10 leaves**. Hence as on 31st March 2023 total balance of employee would be **9 + 18 - 10 = 17**. However, if the employee is new and if it is first year then there is no leave

encashment. as the maximum allowable carry forward each year is 9, the employee would be allowed to encash **12 leaves to the year 2023** and **excess 5 leaves will be carry forwarded**.

### **SICK LEAVE**

- An employee is eligible for six days of sick leaves per year.
- More than 2 consecutive days of sick leaves should have proof of medical certificate which can be uploaded using HRIS portal.
- Sick leave shall not be carried forwarded for the next year or next Leave Cycle. Balance sick leave will lapse by the end date of March month of every year.
- In case, a sick leave taken due to an emergency situation, the employee must make best efforts to communicate with his/her immediate supervisor immediately after such leave.

### **PATERNITY LEAVE**

- An employee is eligible for five days of paternity leaves starting the date of delivery be granted to confirmed male employees with a proof of medical certificate
- Paternity leave will be granted for the one child.
- Any leave/s taken in excess of 5 days will be considered as unpaid leaves and cannot be carried forwarded for the next year or next Leave Cycle
- Paternity leaves may be clubbed with privilege leaves and holidays.
- In case, a Paternity leave has to be taken in an emergency situation, the employee must make best efforts to communicate with his/her immediate supervisor immediately of such leave.

### **CONDOLENCE LEAVE**

- Condolence Leave will be granted to all employees who suffer a personal loss and therefore need to take time to overcome the sorrow due to death of their parents, spouse or children.
- Condolence leave will be granted for a maximum period of 5 days.
- Any leave/s taken in excess of 5 days will be considered as unpaid leaves.

### **MARRIAGE LEAVE**

- Employees are eligible for 5 days of leaves (once in lifetime) for his/her marriage.
- These leaves neither can be carried forwarded nor en-cashed.
- For these leaves an employee shall send a leave application to the concerned department head and the HR at least two week in advance.

### **SPECIAL LEAVE POLICY FOR COVID PANDEMIC**

#### **OBJECTIVE**

The primary purpose of this policy is to support the Employees during Covid pandemic and help them deal with covid related health emergencies for self and their immediate first family members. This policy has been designed exclusively for Covid pandemic situation and is not to be deemed as an employment right or entitled benefit to the employee.

## SCOPE

This benefit will be applicable to all permanent Employees of RAF Solutions LLP/ HealthcareNLP at India Office. To support employees during COVID pandemic related health emergencies, company would provide **“Special Covid Leaves”** to employees to help them cope up with hospitalization of self or immediate first family member/s. Employees can avail this **Special Covid Leave** for themselves and their immediate first family members affected due to Covid by submitting the supporting medical documents.

**SPECIAL COVID LEAVES** would cover following categories of health emergencies:

1. Employee himself or herself being diagnosed as Severe Covid positive case and undergoing treatment at home OR hospital, in case if suffering with mild symptoms and taking home treatment can apply leave as need and work from home and self-quarantine for 14 days.
2. Immediate first family member (Spouse, Kids and parents) being diagnosed as Covid positive and undergoing treatment at home OR hospital.

## LEAVE ELIGIBILITY

Under this policy, employees will be eligible for onetime credit of total 15 days “Special Covid Leaves”. These Leaves would be added in HRIS portal for each employee to help them manage covid medical emergencies related to self and immediate first family members. These leaves are to be utilized for covid and related illness only.

### Employee being diagnosed as covid positive.

**In case an Employee** is diagnosed as covid positive and is undergoing treatment, he or she would be **eligible to apply maximum of 10 working days of Special Covid Leaves (2 work weeks)** to cope up with the Covid treatment including post hospitalization recovery period. Employee can club the weekends along with these 10 days Special Covid Leaves to complete the 14 days quarantine period. **It is mandatory for the employee to attach the supporting document (Covid positive report) while submitting the leave application to concern manager.**

### Immediate first family member being diagnosed as covid positive.

**In case of immediate first family member** being diagnosed as covid positive, **employee would be eligible for 5 days “Special Covid Leaves” (One work week)** to take care of the concern family member. These leaves would help employee to ensure required medication, treatment and care is arranged for the immediate family member at home or hospital during first initial days of treatment. Employee can club the weekend along with these 5 days Special Covid Leaves to spend full 7 days with concern family member.

Under this policy, employee would be eligible for maximum 1 such instance wherein he or she can avail **“Special Covid Leaves”** to support covid treatment of immediate first family members. This means, maximum of 5 days (1 work weeks) leave can be applied from the pool for 5 days total Special Covid Leave for taking care of immediate family member. Employee may apply 5 days

special covid leave for each family member separately if family members are diagnosed covid positive at different time periods. In case of multiple family members being diagnosed at the same time, employee can apply maximum of 10 Special Covid Leaves together to support multiple family members during covid emergency.

**It is mandatory for the employee to attach the supporting document (Covid positive report) for the immediate family member/s for whom he or she wishes to take the Special Covid Leaves. It should be noted that total leave eligibility under this policy is 15 working days of Special Covid Leaves which covers employee's own illness due to Covid as well as immediate first family member/s illness due to Covid. Employee can avail 10 Leaves for their own's treatment and 5 days leave for family member's care. Alternatively, employee may also use 10 leaves to support family (if multiple family members are affected due to Covid) and utilize remaining 5 days during his/her own illness. In any combination, Employee would be only eligible for total 15 days of Special Covid Leave.**

## PROCEDURE

Under this policy, a new leave category called **"Special Covid Leaves"** would be created under HRIS – Leave XXXXX.

- **One-time credit of 10 days Special Covid Leave balance would be done in employee's leave account.**
- Employee would be required to first discuss the leave requirement with concern reporting manager (For self or for immediate family member's health emergency). After taking in principle approval from reporting manager, employee should apply the required leaves through HRMS portal and get it duly approved from concern manager through system.
- It should be noted that, though the leave balance is added in HRMS for all employees, manager's **consent is mandatory to avail this Special Covid Leave benefit.** Employee cannot practice this special covid leave benefit as an employment right or entitled benefit. These leaves are purely designed to support employee during covid related illness for self and immediate family members.
- To avoid any inconvenience during month end payroll processing, employee should ensure that necessary leaves are applied in system and required approval is taken well in advance before payroll processing.

Incase employee is unable to access HRMS system due to hospitalization or any other medical reasons, he or she should inform payroll team directly and seek help for applying leaves in system. Employee may also reach to concern manager to seek help if he or she is not able to access HRMS system. Manager can further coordinate with payroll team to take care of leaves through system.

## MOST IMPORTANT NOTES

- It should be noted that this is a special leave provision created specifically for helping employees during Covid pandemic. This leave category is NOT part of the standard benefits,

statutory benefits associated with employment with RAAPID/ HealthcareNLP and is purely on discretion of management. Though the leave balance is provided to employees, however employee should use these special covid leaves judiciously toward illness related to covid.

- In case employee is required to extend the covid leaves beyond 10 days and weekends due to prolonged illness related to covid, he or she may club their existing CL or SL balance to complete the recovery period. However, they should take prior consent from manager for such extensions on accounts of health conditions.
- Situation related covid pandemic is dynamic, we cannot estimate the exact end date for this pandemic. Hence, it is advisable that employee keeps sufficient balance under this special leave category to meet any future medical emergency for self or immediate first family member during the pandemic period. No additional leaves shall be granted on such occasions wherein employee has utilized these leaves for personal purposes and then he or she comes across any medical emergency related to self or immediate first family member.
- It should be noted that these “Special Covid Leaves” are NON ENCASHABLE. These leave are to be utilized by employee. While employed with RAF Solutions LLP/ HealthcareNLP and on leaving the company, employee will not be eligible to encash these leaves.
- In case employee resigns from RAAPID/ HealthcareNLP during applicability period of this policy, he or she cannot adjust the balance leaves against the notice period Any deviation from the policy will need specific approval from HR Head/ CEO. Exceptions to this policy will require documented approval by the respective CEO of operations of the company.
- Management on its discretion may amend this policy in part or as whole, as deemed necessary in time-to-time basis to make it relevant to the then prevailing circumstances.
- Management may revisit continuation of this leave benefit at end of covid pandemic period. Depending on the situation regarding Covid pandemic in India, management may at suitable time decide to discontinue this Special Covid Leave provision. However, employees would be given sufficient time before discontinuation of this policy.
- In future, no settlement, encashment, or reimbursement requests shall be entertained post discontinuation of this policy

## LONG SICKNESS AND MEDICAL LEAVES

Employees suffering from prolonged illness, medical complications and undergoing treatment at hospital or home are required to first utilize their existing Medical and then Privilege leave (PL) balance.

Considering special medical conditions and in exceptional cases, employee would be allowed to take all available balance of PLs for applying medical leaves.

However, in addition to utilizing all existing leaves there may be situations where employee might need more leaves to undergo treatment. In such cases employee may submit a formal application to provide leave approval till the duration of treatment. In any case maximum duration allowed for LWP would be 60 days. Manager along with Department head and HR may decide and take necessary actions based on the criticality of the position and department the employee is working.

## UNAUTHORIZED LEAVE

As the name suggests, Unauthorized Leave is a leave which is not authorized by the company. It can occur when an employee doesn't take prior sanction or doesn't follow procedure to avail leaves. Unauthorized Leave is different from Leave without pay or Unpaid Leave in a way that even though both the leaves are without pay leaves, Unauthorized Leave may lead to disciplinary action and/or termination of services in certain cases if it prevails for a longer period of time. However, in case if there is any repetition of Unauthorized Leave first time there will be warning, 2nd instance will be followed by deduction of salary, 3rd time disciplinary action process will be followed.

All cases of unauthorized leaves will be governed on a case to case basis and management is free to take any decision best suited to the interest of the company and employees.

## **MATERNITY LEAVE**

Women employees will be eligible for Maternity leaves as per the Maternity Benefit Act 1961.

### **Entitlement**

26 weeks of paid Maternity Leave is allowed to confirmed female employees who have to deliver a child. The applicant can avail 13 weeks of leave before the date of delivery and 13 weeks of leave post-delivery. The maximum leave benefit under normal circumstances will be 26 weeks (6 months/168 days).

During Maternity leave tenure employee will not be eligible for regular Paid leaves.

Maternity leave will be granted for the first two children.

On need basis employee may decide to avail earned leaves and extend the maternity leaves. However, such request should be submitted to the reporting manager and HR for necessary approval. Such requests shall be considered on case to case basis on management's discretion. Any unauthorized leaves taken by employee after immediately preceding or following the maternity leaves shall be considered as leave without pay.

### **Unused Maternity Leave**

In case employee joins back before completion of 26 weeks' maternity leaves, then balance maternity leave would not be carried forward to next year's balance. Balance leaves would lapse with the end of current calendar year.

### **Procedure to Apply**

Written application for the maternity leave, along with the doctor's certificate should be submitted by the Employee at least one month prior to start of maternity leave.

This application should also mention the dates and duration of the leave period as well as the date for resuming duties after maternity leaves. The application should be submitted to concerned reporting authority who would further recommend the application to HR POC.

Employee should meet HR POC before proceeding on leave to ensure they understand various rules, regulation and benefits applicable during the maternity leave.



## 7. PROPOSED GRADE MATRIX AND DESIGNATIONS

Parlance	Grade	Role / Title	Engineering+ AI+ Product+Support - Indicative Designations
Key Managerial Personnel(KMP)	C2	CEO / Chairman	CEO, Executive Director, Managing Director, Chairman, Co-Founders / Board Members
	C1	CTO	CTO / CMO / CRO / COO
Support / HR & Admin / F&A / Marketing / Sales / Others	L4	SVP / EVP	For all HR, Finance, Sales, Accounts, Marketing
	L3	VP	For all HR, Finance, Sales, Accounts, Marketing
	L2	Sr. Director	For all HR, Finance, Sales, Accounts, Marketing
	L1	Director	For all HR, Finance, Sales, Accounts, Marketing
	L0	Associate Director	For all HR, Finance, Sales, Accounts, Marketing
	M3	Sr. Manager	For all HR, Finance, Sales, Accounts, Marketing
	M2	Manager	Manager - Accounts/Manager - HR/Manager Admin /Manager IT/Manager - Business Development/ Manager – Sales
	M1	Lead	Team Lead/Asst. Manager/Accounts (India / US)/ Team Lead IT/Lead - HR/Admin/Sales/Marketing
	E4	Sr. Executive	Sr. Engineer/ Sr. Executive - HR/Sr. IT Executive Support/Sr. Executive – Admin / Analyst
	E3	Executive	Executive Accounts (India / US) /IT Executive Support /Executive BD/ Sales / Executive HR /TA /Executive Admin
	E2	Executive	Engineer/Executive Accounts (India / US) / IT Executive Support/Executive BD/ Sales / Executive HR/TA / Executive Admin
	E1	Executive	Engineer/ Executive Accounts (India/US)/IT Executive Support/Executive BD/ Sales / Executive HR /TA / Executive Admin/Associate
	E0	Associate	Intern/Fresh Graduate/Trainee

## 8. POLICY ON PROBATION AND CONFIRMATION OF EMPLOYEES

The probationary period is used to ensure that the employee is qualified to perform the job and achieves the regular status of employment. During this period, the company will evaluate employee's performance and general suitability for regular employment. To make this decision, expected performance standards and objectives will be communicated to the employee. The company would regularly evaluate employee's performance and the overall learning abilities to decide on whether to confirm his/her services.

- All newly appointed employees will be on probation for a period of **3 months** from the date of their appointment. However, for L0 and above grade roles probation will not be applicable.
- During the probation period employee's overall performance, learning capabilities and growth potential will be reviewed.

- On completion of 3 months' probation period, a formal review will be done by the manager and on satisfactory performance, the services will be confirmed in writing.
- In the event of unsatisfactory performance, behaviour or attitude, an employee will be counselled to improve the performance. Depending on the circumstance, the company may decide to either extend the probation period or terminate the probation period.
- In case of extension, the probation period would be extended up to 1 months' time. In any case, the total duration of probation would not be beyond 3 months.
- In case employee's performance continues to be an issue then management may decide to terminate services with appropriate advance notice to the concerned employee.

## 9. POLICY ON PERFORMANCE APPRAISAL

- Performance evaluations are designed to let the employees know about his/her status in the areas of job performance. The performance review will be used to establish goals, identify employee's strengths and/or weaknesses, and create a plan for improvement. Performance appraisals also help to measure employee's learning abilities and growth potentials to plan future career pathing/progressions.
- **RAF Solutions LLP/ HealthcareNLP** strongly believes in creating a performance-driven culture. In order to institutionalise this culture, the annual appraisal process has been established to review an individual's performance towards company OKRs and assigned goals, KRA/KPI to each employee. For all people who are into people management roles, 360 review feedback is mandatory.
- Performance review discussions and Performance Appraisals in the form of increment and/or promotions will be done once in a year as per the guidelines mentioned in this policy.
- Annual increment percentages will be defined and finalized by the management based on Business outcome, growth, profitability, market norms and individual contributions towards the company's goal.
- **"RAF Solutions LLP/ HealthcareNLP" follows the following 2 performance appraisal cycles:** We follow the 2 annual periodic appraisal cycles. Employee will be eligible for appraisal once in a year, April to March and October to September.

### ○ April cycle

#### **Eligibility Criteria:**

The employee who has joined between 1st March of a previous calendar year to 31<sup>st</sup> August of a current financial year will be eligible for pro-rata based annual increments effective April of next financial year. Provided he/she has successfully completed the probation period and has been confirmed in his/her employment with RAF Solutions LLP/ HealthcareNLP.

**Example 1:** Employee, who has joined on 1st April 2022 will be eligible for appraisal in the month of April 2023 for 12 months. (For 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2023)

**Example 2:** Employee, who has joined on 16th June 2022 will be eligible for appraisal in the month of April 2023. However, his/her increment shall be calculated on a pro-rata basis for the duration of 9 months. (16<sup>st</sup> June 2022 to 31<sup>st</sup> March 2023.)

Joining Month & Year	Appraisal Effective Month	No. of months prorate as per the Joining date	Joining Month & Year	Appraisal Effective Month	No. of months prorate as per the Joining date
March	April	12	January	October	10
April	April	12	February	October	09
May	April	11	September	October	12
June	April	10	October	October	11
July	April	09	November	October	10
August	April	08	December	October	09

#### ○ October cycle

##### **Eligibility Criteria:**

The employee who has joined between 1<sup>st</sup> Jan/Feb/Sept/Oct/Nov/Dec of a current financial year to 31<sup>th</sup> December of a current financial year will be eligible for pro-rata based annual increments effective October of same year. Provided he/she has successfully completed the probation period and has been confirmed in his/her employment with RAF Solutions LLP/ HealthcareNLP. The October cycle for RAF Solutions LLP/ HealthcareNLP employees will be applicable for the first time hires and subsequently all the employees would be converted to April cycle.

**Example 1:** Employee, who has joined on 1st February 2022 will be eligible for appraisal in the month of October 2022 for 09 months. (For 1<sup>st</sup> February 2022 to 31<sup>th</sup> September 2022)

**Example 2:** Employee, who has joined on 15<sup>th</sup> November 2022 will be eligible for appraisal in the month of October 2023. However, his/her increment shall be calculated on a pro-rata basis for the duration of 9 months. (15<sup>th</sup> November 2022 to 30<sup>th</sup> September 2023).

## 10. INTERNAL JOB PROMOTION (IJP) & EMPLOYEE TRANSFER POLICY

### **a) Internal Job Promotion (IJP)**

#### **Objective:**

The purpose of this policy is to encourages career opportunities, identify and develop talent within the organization for its continued growth and success. The idea behind this policy is to provide growth opportunities to the employees by identifying the talent required internally rather than hiring people externally.

#### **Scope:**

This policy is applicable for all the active (full-time/ permanent) employees only

**Eligibility Criteria:**

- Employee(s) must have successfully completed at least 2 years in continuity in the system with same business entity
- Employee(s) performance rating must be 3.5 or above in previous appraisal cycle(s) throughout his/her tenure with the business entity

**IJP Procedure:**

- Once Hiring manager is willing to open an IJP, they will share the requirement with HR department to understand the available current skill set within the same entity.
- If they mutually agreed of availability of such resources within the organization in same entity, then said position will be published for IJP
- HR will circulate the requirement update and the same through Email/HRMS application.
- Once HR starts receiving resumes for IJP via emails, screening procedure will start and if application(s) qualify as per the criteria defined in the IJP, it will be sent to the respective Hiring manager
- Hiring manager would carefully review all qualified resumes and select resumes which are most suitable for the said position for further interview process
- In case employee's resume is selected for IJP, HR department will inform the employees through an email
- In case the employee's resume is not selected for the said IJP, even in that case HR would formally update the employee about the status of application
- Hiring managers would be required to formally do an interview of all selected resumes and share necessary feedback to HR for further communication to the employee and his/her reporting manager
- Once the employee is selected, HR will organize a joint meeting between Hiring manager, employee's current reporting manager to discuss and finalize the transition plan
- Once the transition plan is finalized, shortlisted employee would be called to close the formal offer discussion and transition plan

**Guidelines:**

- The employee has to discuss his/ her intention with reporting manager. After taking necessary consent on email employee should apply for IJP
- The concerned reporting manager shall review and analyze availability of back up resources before giving consent to employee on email to apply for IJP. This is to ensure business continuity
- Employee appearing for IJP can apply in the same grade or one grade above across entities (wherever the opening is rolled out in IJP)
- Interested employee has to undergo the entire channel of Interview process as decided by HR and the Hiring Manager to get selected for the new position in whichever entity the IJP is rolled out
- Once the employee is shortlisted for the said position, employee's HOD, HR and hiring manager for the new role should jointly discuss and agree on the transition plan

- Once the employee is rejected he/she will not be considered at least for the same position for next 6 months
- For an Employee getting selected for an IJP in the same grade, Compensation revision will be happening in the following revision cycle
- In case an employee is selected for the grade above his current grade, then the hiring manager and HR would jointly discuss and confirm the necessary salary revision, which should come into effect from the date when employee starts the new role (either same or different entity)
- The revised salary (exact %age & figure) will be informed to the employee post discussion as per above point
- Employee who has received the salary revision due to grade change (in reference to IJP) any time between our company's appraisal cycle (April or Oct) before the next appraisal cycle, will not be eligible for the appraisal that is immediately following.

## **b) Employee Transfer Policy**

### **Objective:**

This policy aims to provide fair and equitable guidelines to employees when there is a movement of an employee from one job, department or shift to another at the same designation in or another business entity. Employee transfer can be of different types like:

- 1) **Lateral:** It is when an employee moves from one job, department or shift to another at the same entity or different with same pay grade & related benefits of previous job. When a lateral transfer occurs, the new job often has a similar title and similar responsibilities as the previous job. It could also keep the employee at the same level but with different responsibilities
- 2) **Voluntary:** It is an employee-initiated movement to another position in the same or different role in the same pay grade & related benefits of previous job in the same or different entity.
- 3) **Involuntary:** It is a transfer that is not voluntary on the employee's part. Involuntary transfers typically occur with job changes that are impacted by various organization situations and changes respectively

### **Purpose:**

The purpose of making this transfer policy is to meet the organizational needs, satisfy employees' need and make them more versatile and adjust workforce.

### **Scope:**

This policy is applicable for all the active (full-time/ permanent) employees of all business entities

- The present supervisor and business/dept. head must verify that all eligibility criteria for an employee's transfer has been met, including verifying the employee's past work performance, before recommending an employee for transfer
- If the eligibility criteria has not been met, the supervisor and the HR will assess employee's request for the transfer and inform the employee about the final decision
- The HR will render a final decision on all the transfer requests across all the business entities
- After an employee is selected and approved from all levels by his present and upcoming

manager as well as HOD along with HR (at all stages proper documentation & email must be available), they will mutually decide on the transfer date. The employee does not decide the starting date

- The upcoming supervisor and HOD should receive a complete information regarding employee's performance, employment history etc. from the present supervisor before 3 days from the agreed date of transfer
- Employees transferring to a new department or position will experience a new 2 months' Probation period, other employment terms and conditions will remain unchanged. This period is established to ensure that the employee selected for the new position is qualified and can meet the minimum performance standards for that position
- Any employee serving notice period or separated from any of the business entities will not be eligible for any transfer/movement/ re-hire to a different entity
- For any exception(s) for the above point, both entities' supervisors and HODs must communicate to the HR via email. This will be subject to HR head and CEOs approval

## 11. EMPLOYEE SEPARATION POLICY

We wish and love our employees to stay with us for longer periods. However, company appreciates the employees' right to separate the employment at any point of time. We value our association with each employee and would like to continue our relationship even after the employee leaves the company. This policy applies to all employees, trainees/ interns and consultants as per their terms of appointment.

An employee is separated from his/her services with the Company due to the following scenarios:

- I. Voluntary Separation:
  - a. Resignation
- II. Involuntary Separation:
  - a. Termination on grounds of performance/ misconduct/unethical practice/business realignment
  - b. Superannuation
  - c. Separation due to Death

### I. Voluntary Separation:

#### a. Resignation

**Policy:** An employee wanting to terminate his/her employment on the voluntary ground should submit a formal resignation letter via Hard copy or Email/HRIS to concerned reporting manager. However, employees must ensure that they first discuss their intent to resign from duties with respective reporting manager. Only after having a formal discussion with the reporting manager, the employee is required to submit the formal resignation letter.

Notice period applicable to various Grades/levels is mentioned below:

Parlance	Grade	Role / Title	Engineering+ AI+ Product+Support - Indicative Designations	NP during Probation calendar days	NP for Confirmed Employees calendar days
Key Managerial Personnel( KMP)	C2	CEO / Chairman	CEO, Executive Director, Managing Director, Chairman, Co-Founders / Board Members	NA	60
	C1	CTO	CTO / CMO / CRO / COO	NA	60
Support / HR & Admin / F&A / Marketing / Sales / Others					
	S2	SVP / EVP/ VP	For all roles as per Grade Matrix	NA	60
		Associate Director/ Director		NA	60
	S1		For all roles as per Grade Matrix		
	M3	Sr. Manager	For all roles as per Grade Matrix	15	60
		Manager/ Sr. Manager		15	60
	M2		For all roles as per Grade Matrix		
	M1	Lead/ AM	For all roles as per Grade Matrix	15	60
	E2	Sr. Executive	For all roles as per Grade Matrix	15	45
	E1	Executive	For all roles as per Grade Matrix	15	45
	E0	Associate	For all roles as per Grade Matrix	15	45

### Proceedure

- All regular/ full-time employees are required to serve the notice period as mentioned above, which will be effective from the date of resignation. However it is agreed mutually along with reporting manager and HR.
- In case if the employee does not full-fill require notice period as per his/her grade and discontinues his/her employment then no experience and a relieving letter will be issued. Management may decide to recover the salary in lieu of unfulfilled notice period.
- No formal resignation acceptance to be issued to the employee if notice period or any other clearance formalities are pending from employee's end.
- The employee should not communicate the information regarding his/her resignation through Email or any other medium to any other employee's other than his/her reporting manager at any point of time after his/her resignation.
- In case, any of such information circulated to anyone, without any prior approval from HR POC, it may amount to withholding of the employee's full and final settlement.
- Employees are not allowed to take vacation leave (PL) during Notice Period. An employee can use NBL with prior approval from the reporting manager.
- As defined in the above table, the notice period is applicable on either side. In the case of the unfulfilled notice-period organization has the right to recover salary in lieu of unfulfilled notice period.
- Reporting manager along with HR POC will agree the knowledge sharing procedure of resigned employee and follow the exit clearance process and inform HR, IT Support, F&A



the last date applicable to relieve such employee from duties through following exit procedure post recovery of all the company assets (HRIS, hard copy or Online).

**Applicability of Notice Period in case of Termination account of Misconduct, Unethical behaviour or gross violation of the company's code of conduct.**

- Your employment is liable for termination any time during your probation or thereafter, without any prior notice if you are found guilty of Misconduct, Unethical behaviour or Gross violation of company's policies, code of conduct.

## **II. Involuntary Separation:**

### **a. Termination**

The Services of an employee may be terminated on any of the mentioned below grounds:

1. Termination due to unsatisfactory performance or business circumstances.
2. Your employment is liable for termination any time during your probation or thereafter, without any prior notice if you are found guilty of Misconduct, Unethical behaviour or Gross violation of company's policies, code of conduct. Any behaviour, action that may directly or indirectly cause harm to company's image, business, clients, client's employees, company's employees, company's culture or any business affiliate shall be treated as misconduct.
3. Termination of Absconding employee

The scenarios and the respective procedures are defined in detail as mentioned below:

### **1. Termination due to unsatisfactory performance:**

#### **a. Unsatisfactory performance during probation:**

An employee may be terminated on account of unsatisfactory performance during the probation period. He/She can be terminated in case he/she has been assessed as an unsatisfactory performer during probation or in the extension period.

#### **Procedure:**

- The line manager should clearly communicate the reason for the termination of the probation review form.
- The line manager should discuss the reason for termination with the HR POC and update the final status
- Then HR POC should communicate the same to the concerned employee.

HR POC should complete the full and final formalities accordingly.

#### **b. Unsatisfactory performance after confirmation:**

Employee's appointment may be terminated any time during his/her employment period for the reason of non-performance.

#### **Procedure:**

- Once an employee has been found as a non-performer, initially he/she will be guided, coached and mentored by their reporting manager and HOD.
- During this period, the employee will be put on a formal “Performance Improvement Plan” (PIP), where he/she is given a chance to improve their performance.
- In the PIP plan, expected performance parameters are set by reporting manager and HOD and against which performance will be reviewed up to next 1 month time based on the defined frequency for review meetings.
- The review feedback is given after completion of month, however if the time line is maximum of then the final decision can be communicated at the end of the third month.
- The decision can be either close of PIP, termination or extension of a performance improvement plan. However, the extension should be a maximum of three months and not beyond that.

## **2 Termination on account of Misconduct or involvement in Unethical practices**

- Employee’s employment is liable for termination any time during your probation or thereafter, without any prior notice if they are found guilty of Misconduct, Unethical behaviour or Gross violation of company’s policies, code of conduct. Any behaviour, action that may directly or indirectly cause harm to company’s image, business, clients, client’s employees, company’s employees, company’s culture or any business affiliate shall be treated as misconduct.
- An employee who is found guilty of breaking company rules/ misconduct will have to face the termination with or without notice depending upon the seriousness of the act.

### **Procedure:**

- Initially, the employee will be given a verbal warning. If the person continues doing similar kind of misconducts, he will be issued a warning letter highlighting the clause of termination in case the same action is repeated.
- After issuing a verbal and written warning, if an employee is found continuing such habits/acts, then he/she will be given the termination letter.
- In the case of any involvement in unethical practice, the company holds the right to terminate employee’s services with immediate effect.

## **3 Termination of Absconding employee:**

Failure by an Employee to inform to the company the reason for any continuous absence will be considered as “absconding from the company”. In such cases, it would be deemed that employee is no more interested, committed to continuing his/her employment with the company and the company may initiate the following action in reference to terminating the employment.

### **Procedure:**

- In case of absence from duty, the company will send a first show-cause notice letter/ email to the employee on his/her postal address, clearly mentioning the repercussions of uninformed absenteeism.
- In case the employee does not respond to the 1st communication within 3- 4 working days, he will be issued a second show-cause notice letter.

- If still, the situation remains the same, a termination letter will be issued and the same will be sent to the correspondence address.
- HR POC shall officially terminate the employee and put all dues on hold.

#### **b. Superannuation**

- An employee will retire from the services of the company on attaining the age of superannuation i.e. 60 years, as per the date of birth recorded in the Company's records.
- The HR will intimate, in writing to the retiring employee, three months in advance, about his/her impending retirement through the Head of the Department.
- The full and final settlement dues will be processed by the HR as per the usual process.
- The management may, at its discretion, grant an extension beyond the age of superannuation to an employee. Alternatively, the employee concerned may be engaged on contract basis on mutually agreed terms and conditions.

#### **c. Separation due to Death**

- In the event of the death of an employee, the entire process starting from No Dues Clearance to payment of F & F dues of the deceased employee will be handled by the HR Department.
- The admissible dues to be paid will include salary, leave entitlements and other dues payable by the company and clear his/her settlement w.e.f. the last working day.
- The payment of the dues shall be made to the legal heir/nominee(s) of the deceased employee subject to certification of the claim based upon the nominee declaration submitted by the employee.
- An employee needs to fulfil the separation formality which includes
  - An employee needs to ensure that the handover takeover procedure is done properly
  - An employee needs to take clearance from various departments in Clearance Form which will ensure that there are no dues pending or any company's property remains with the employee.

## **12. GRIEVANCE MANAGEMENT POLICY**

At **RAF Solutions LLP/ HealthcareNLP** we are safe, disciplined, reliable and authentic. We act on our responsibilities to identify and remove risks to a healthy and safe workplace; we are committed to addressing any type of issues faced by employees in the workplace. fair, equitable and productive work environment

The company understands and appreciates the fact that while you are working in the company, the situation may arise when an individual or group of individuals have a concern about the behaviour of others or the decision of others. The company has therefore established a framework to promote timely and transparent resolution.

The purpose of this policy is to ensure that concern or grievances raised by the company employees or consultants are managed in a timely and confidential manner. Every HOD, Manager and employee has a responsibility to comply with this policy and to treat everyone who works here with dignity and respect. Seeking redress of a trivial or vexatious issue through a grievance procedure will not be tolerated and may result in disciplinary action.

- **Grievance:** Any discontent or dissatisfaction whether expressed or not and whether valid or not arising out of anything connected with the company / organization that an employee thinks / believes or even “feels” is unfair or unjust.
- **Complaint:** An expression of grievance, dissatisfaction or concern.
- **Victimise:** To act or omit to act towards a person in a way which is intended to cause disadvantage to that person because they have made a complaint, or may make a complaint, or may be or are the subject of a complaint.

All persons have the right to:

- Make a complaint to their direct manager or another manager of the company at an appropriate level.
- Be treated with respect and impartiality and provided with support throughout the process.
- Have the principles of natural justice and procedural fairness observed. This means, Complaints must be fully described by the person with the grievance.
- The person who is the subject of concern must be informed of all the allegations in relation to his/her behavior.
- The person who is the subject of concern must have a full opportunity to put forward their case:
- All parties to the complaint must have the right to be heard.
- All relevant submissions and evidence must be considered.
- Irrelevant matters must not be taken into account.
- The decision-maker must be impartial, fair and provide justice.
- 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 a grievance to participate fully in the resolution process in good faith. Confidentiality must be respected and maintained at all times 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:**

- **Level 1:** Prior to the initiation of grievances, the employee is expected to discuss his/her concern with the reporting manager to solve the problem informally. If the employee is satisfied with the decision of reporting manager the matter will be closed there and then.
- **Level 2:** If the employee is still not satisfied with the decision taken by manager and HR POC, he/she can submit a formal request to rights to take this matter to the next level, i.e. to CEO of the company. CEO/Founder will jointly work with HR and reporting manager to address the employee grievance and resolve the matter by giving the fair justice.

### Withdrawal of Grievance during the settlement process:

- When an employee wishes to withdraw the grievance prior to the issuance of a hearing decision, or when the parties agree to a settlement of the grievance, he/she should submit a written request to the HR POC.
- The grievance withdrawal request should clearly state the reason for which employee wishes to withdraw the grievance. Such a withdrawal letter terminates the grievance process.

## 13. COMPANY DRESS CODE

The Company has adopted Smart Casual Wear for employees who do not have face to face customer contact while at work. In order to create and maintain a professional image, employees are expected to wear clothing that is not offensive or distracting to clients and colleagues. This includes maintaining appropriate and commonly accepted standards of dressing and grooming that reflects a professional and business-like the image at all times.

**"Smart Casuals"** has been defined as the preferred dress code for all employees operating from office.

**"Smart Casuals"** will be defined as follows:

- **For Men:** Trousers or Pants, Denim, Chinos, full/half sleeve shirts with or without collars, T-Shirts with or without collars. Colours and designs should not be very bright or loud.
- **For Women:** Sari, Salwar kameez, trousers (dress slacks), Denim, tops, shirts with or without collars, sweaters.

**Not Acceptable:** Torn clothing, torn shoes, unpolished shoes, shorts, skirts shorter than four inches above the knee, T-shirts with obscene, suggestive or vulgar statements.

**Kindly avoid:** Wearing slippers; t-shirts with obscene, suggestive or vulgar statements; low waist pants, jeans with tassels, patches, etc., shorts, capris, torn or worn-out clothing. There may be some casuals not listed here, which may be considered inappropriate office wear. As a general principle, good judgment should be exercised in the selection of attire in line with the company's professional image.

## 14. POLICY ON SALARY AND BENEFITS

The company is committed to providing a total compensation package to employees. The organization follows the monthly payroll cycle and pay is processed by 7<sup>th</sup> of the subsequent month. Payment towards monthly salary shall be done through Bank Transfers.

## 15. OFFICE CODE OF CONDUCT

The purpose of this policy is guide employees with business code of conduct at workplace. this policy applies to all employees and consultants across India.

## A. CORE VALUES:

All employees shall demonstrate steadfast commitment to following core values of the company

1. **Integrity:** Employees shall always take the high road by practicing the highest ethical standards, and by honoring their commitments. Employee shall take personal responsibility for their actions and treat everyone fairly and with trust and respect.
2. **Can do Attitude:** Between stimulus and response there is a space. In that space is our power to choose our response. In our response lie our growth and our freedom.
3. **Converting Challenges into Opportunities:** Every adversity, every failure, every heartache carries with it the seed of an equal or greater benefit.
4. **Employee Centricity:** we believe that our strength and our competitive advantage are and always will be people. Employees shall continually learn, and share, ideas and knowledge. Our organization encourages cooperative efforts at every level and across all activities in our company.
5. **Customer Centricity:** Satisfied customers are essential to success. All employees shall achieve total customer satisfaction by understanding what the customer requires and delivering it flawlessly.
6. **Innovation:** We promote an innovative culture and attitude. We think differently and strive to apply innovative thinking and creativity to everything we do. On a daily basis, we demonstrate Innovation by:
  - Developing innovative solutions to customer problems
  - Differentiating through creative material, product, process and service developments
  - Being proactive in initiating change and improvement
  - Sharing knowledge and experience through teamwork

## B. BUSINESS ETHICS:

The reputation of the company depends on the conduct of its Directors, officers, and employees. Every employee should support the company's commitment to ethical business conduct. Each one of us should respect and obey the laws of the cities, states, and countries where we operate. We should respect the rights of competitors, customers, and suppliers. We expect employees to avoid any association which might conflict with their loyalty to the company compromises their decision making for the company. or through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other unfair dealing practices.

## C. EXTERNAL ENGAGEMENT:

We expect you to devote your primary work efforts to the business of the Company. This requires you to refrain from any outside employment or engagement in any type, mode, pattern or cause during the course of your association with the company. This includes avoiding any formal, informal association with any individual, group of individuals, proprietary firm,

partnership firm, private limited or limited organization, semi-government or government organizations, academic institutes, NGOs on a part-time, full-time or advisory basis. Cause of such association may include but not limited to any form of engagement for remunerations, profit sharing, advisory, consulting, voluntary, future business prospects, friendly help that is conducted during official work timings, before or after work timings, during the weekend, holidays and leave period.

Any employee willing to pursue any form of the voluntary, non-monitory mode of external engagement should first furnish all details of such engagement and seek formal approval from management through the HR department. The management team would duly review such application and may decide to approve or reject such request keeping business interests in mind.

During the employment with the company, if an employee is found engaged in any form of external engagement or association, the company would take necessary disciplinary actions including legal action to recover the damages and losses or if found necessary may terminate my employment with immediate basis.

#### **D. CONFLICT OF INTEREST:**

We expect all the employees to be loyal to the company's business interest, clients and therefore avoid any actual or apparent conflict of interest. A "conflict of interest" exists whenever an individual's personal interests interfere or conflict in any way with the interests of the company as a whole. A conflict situation can arise when an employee takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively.

Some of the more common conflicts are like Compensation from non-company sources, a relationship of the company with third parties, Gifts etc. The employees or a member of his or her family, should not accept any gifts or favour from suppliers or customers which can influence in making decisions against company interest. If any such gifts are offered, it should be reported to management.

Conflicts of interest are prohibited as a matter of Company policy. Conflicts of interest may not always be clear-cut, so if you have a question, you must consult with higher levels of management. Any employee, officer or director who becomes aware of a conflict or potential conflict must immediately bring it to the attention of a supervisor, manager or HR POC.

#### **E. IT & INTERNET USAGE POLICY**

This Internet Usage Policy applies to all employees of RAF Solutions LLP/ HealthcareNLP who have access to computers and the Internet to be used in the performance of their work. Use of the Internet by employees is permitted and encouraged where such use supports the goals and objectives of the business. However, access to the Internet is a privilege and all employees must adhere to the policies concerning Computer, E-mail and Internet usage. Violation of these policies could result in disciplinary and/or legal action leading up to and including termination of employment. Employees may also be held personally liable for damages caused by any



violations of this policy. All employees are required to comply following guidelines in reference to IT & Internet usage:

- All employees have been provided with various IT equipment like Laptop or Desktops for their daily work. It is expected from employees that they make judicious and careful use of these tools and equipment.
- Employees should refrain from transferring any data (company or personal) from the system. If need be, such data transfer request should be submitted to concerned line manager with a copy to head of the department for their approval. Any form of data on your system would be deemed confidential unless discuss and agreed in particular. Hence, the transfer of any form of data from the system is strictly prohibited.
- No external device or tool like Pen Drive, Hard Disk, External Storage, CD/DVD, Tablet, Phablet or any type of Smartphone should be connected to your system without prior approval from the head of Department or HR POC. Any need of such nature should be first discussed and appropriate steps should be followed as per the instructions from the head of Department or HR POC.
- Use of the internet should be strictly practised for fulfilling job responsibilities only. Employees should refrain from surfing social community sites, chatting, personal email accounts, blogs, derogatory, indecent, objectionable content, e-commerce web site for personal shopping, Online games.
- There is a Zero Tolerance Policy towards Adult websites. Any instance of an employee violating this policy could result in immediate termination of services.
- Job-related activities include research and educational tasks that may be found via the Internet that would help in an employee's role.
- All Internet data that is composed, transmitted and/or received by RAF Solutions LLP/ HealthcareNLP's computer systems is considered to belong to RAF Solutions LLP/ HealthcareNLP and is recognized as part of its official data. It is therefore subject to disclosure for legal reasons or to other appropriate third parties.
- The equipment, services and technology used to access the Internet are the property of RAF Solutions LLP/ HealthcareNLP and the company reserves the right to monitor Internet traffic and monitor and access data that is composed, sent or received through its online connections.
- Emails sent via the company e-mail system should not contain content that is deemed to be offensive. This includes, though is not restricted only to the use of vulgar or harassing language/images.
- All sites and downloads may be monitored and/or blocked by RAF Solutions LLP/ HealthcareNLP if they are deemed to be harmful and/or not productive to business.

## **F. POLICY FOR USE OF SOCIAL MEDIA NETWORKING:**

### **Policy brief & purpose**

Our social media company policy provides a framework for using social media. Social media is a place where people exchange information, opinions and experiences to learn, develop and have fun. This policy provides practical advice to avoid issues that might arise by careless use of social media. Whether employees are handling a corporate account or use one of their own, they should follow the policy guidelines mentioned in this document.

### **Scope:**

Applicable to all employees working in RAF Solutions LLP/ HealthcareNLP.

### **Policy elements:**

“Social media” refers to a variety of online communities like blogs, social networks, chat rooms and forums. This policy covers all of them. We consider two different elements: using personal social media and representing our company through social media.

#### **Representing our company**

Some employees represent our company by handling corporate social media accounts or speak on our company’s behalf. We expect them to act carefully and responsibly to protect our company’s image and reputation. Employees should:

- Be respectful, polite and patient, when engaging in conversations through various social media platform on our company’s behalf. They should be extra careful when sharing general testimonials, announcing the company’s special offers, making declarations or promises towards customers and stakeholders. An employee should strictly follow the guidelines, norms defined by concern authorities in the organization.
- While interacting on public groups on social media platform employee should avoid passing opinion, advice on matters outside their field of expertise when possible. However, official posts, comments and opinions shall only be shared after due discussions with relevant internal stakeholders.
- Follow our confidentiality, data protection policy and observe laws on copyright, trademarks, Intellectual property rights.
- Never post discriminatory, offensive or libellous content and commentary.

#### **Gambling in the Workplace**

- Gambling while at work and using company assets for gambling are prohibited, including during breaks.

#### **Workplace Violence**

- RAF Solutions LLP/ HealthcareNLP is committed to maintain a safe and secure workplace and working environment.
- Acts or threats of physical violence, intimidation, harassment or coercion, stalking, sabotage, and similar activities are not tolerated. Employees who engage in acts or threats of violence may be terminated.

- Employee shall not bring, carry, store, or use any type of weapon on RAF Solutions LLP/ HealthcareNLP owned, leased, or rented property; vehicle; in a personal vehicle while on RAF Solutions LLP/ HealthcareNLP business. A "weapon" is a firearm, ammunition, explosive, or any other device or object that can be construed as a weapon.

### **Child Labour**

RAF Solutions LLP/ HealthcareNLP do not tolerate the use of child labour through force or the threat of force. Children must not be financially exploited or be allowed to perform work that can be dangerous, which prevents them from attending school or which may jeopardize their health or physical, psychological, spiritual, moral or social rights.

### **Guidelines to be followed for Publications and Public statements on social media:**

Employees should take written approval from the company's authorized person before publishing or submitting for publication and/or any material that relates to employees work at the company and/or incorporates any proprietary information. To ensure that the Company delivers a consistent message about the company's products, services and operations to the public, and further in recognition that even positive statements may have a detrimental effect on the Company in certain securities transactions and other contexts, any statement about the Company which employee create, publish or post during his/her period of employment and for six (6) months thereafter , on any media accessible by the public, including but not limited to electronic bulletin boards and Internet-based chat rooms, must first be reviewed and approved by an authorized person of the Company before it is released in the public domain.

### **Important do's and don't**

- While creating a personal social media account, employees should not use company E-mail ID.
- An employee should not use personal accounts across any social media platform for official communication with Client, Client authorized point of contact, Vendor, Business Associates, consultants and advisors.
- Employee shall not publish a post or release any information that is considered confidential or not public. Confidential information includes trade secrets, commercial details, employee details, client details, any direct or indirect information that may potentially harm a company's broader business interest.
- If there are questions about what is considered confidential, an employee should check with the Human resource department/ seniors.
- Avoid any offensive or derogatory content. It may be considered as a violation of our company's anti-harassment policy, if directed towards colleagues, managers, Management Team, Client, Client authorized point of contact, Vendor, Business Associates, consultants and advisors.

### **Disciplinary Consequences:**

The company would monitor social media postings on our corporate account on a regular basis.

Company may take disciplinary action leading up to and including termination of a particular employee is found violating a company's social media policy and guidelines mentioned in this document.

## **G. ANTI HARRASSMENT AND NON DISCRIMINATION:**

- RAF Solutions LLP/ HealthcareNLP India strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. Employees should be able to work and learn in a safe, yet stimulating atmosphere. The accomplishment of this goal is essential to the mission of the company. For that reason, RAF Solutions LLP/ HealthcareNLP will not tolerate unlawful discrimination or harassment of any kind with the employees/visitors. Through enforcement of this policy and by the education of employees, the company will seek to prevent, correct and discipline behaviour that violates this policy.
- All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offence, disciplinary action may include verbal or written reprimand, suspension or termination of employment.
- It is a violation of RAF Solutions LLP/ HealthcareNLP's policy to discriminate in the provision of employment opportunities, benefits or privileges; to create discriminatory work conditions; or to use discriminatory evaluative standards in employment if the basis of that discriminatory treatment is, in whole or in part, the person's race, colour, national origin, age, religion, disability status, gender, sexual orientation, gender identity, genetic information or marital status.
- RAF Solutions LLP/ HealthcareNLP prohibits harassment, including sexual harassment, of any kind, and will take appropriate and immediate action in response to complaints or knowledge of violations of this policy. For purposes of this policy, harassment is any verbal or physical conduct designed to threaten, intimidate or coerce an employee, co-worker, visitors, customers or any person working for or on behalf of RAF Solutions LLP/ HealthcareNLP. Verbal taunting (including racial and ethnic slurs) that, in the employee's opinion, impairs his or her ability to perform his or her job is included in the definition of harassment.

## **H. NO SMOKING, GUTKA, DRUGS, AND ALCOHOL AT WORK - POLICY:**

RAF Solutions LLP/ HealthcareNLP is committed to providing a safe and healthy workplace and to promoting the health and well-being of its employees. As required by the law and also motivated by our desire to provide a healthy work environment for our employees, the following smoking and Gutka free workplace policy have been defined for all employees of RAF Solutions LLP/ HealthcareNLP.

RAF Solutions LLP/ HealthcareNLP prohibits smoking and consumption of gutka, pan, pan masala, tobacco on all company premises in order to provide and maintain a safe and healthy work environment for all employees.

### **Scope**

The Smoke and Gutka free workplace policy applies to:

- All areas of buildings occupied by company employees.
- All company-sponsored off-site conferences and meetings.
- All vehicles owned or leased by the company.
- All visitors (customers and vendors) to company premises.
- All contractors and consultants and/or their employees working on company premises.
- All temporary employees.
- All student interns.

## **Drugs and Alcohol**

RAF Solutions LLP/ HealthcareNLP prohibits the use, consumption of any kind of Alcohol, Drug substances on all company premises as well as where an employee is representing the company in order to provide and maintain a safe and healthy work environment for all employees. All internal workplaces are to be 100 percent drugs and alcohol-free.

The essential requirements of the policy are that:

- Employees must always be in a fit state to carry out their duties when at work. They must not possess, consume or be under the influence of alcohol or other impairing substances.
- RAF Solutions LLP/ HealthcareNLP has a 'zero tolerance' to drugs and alcohol. Employees are not permitted to work while under the influence of drugs or alcohol.
- Anyone suspected of being impaired due to alcohol or substance abuse or taking of drugs, legal or illegal, must immediately be removed from the workplace.
- RAF Solutions LLP/ HealthcareNLP might carry out screening for alcohol and drugs whenever considered appropriate. Testing may be carried out on reasonable suspicion or following an accident or incident.

## **I. DISCIPLINARY ACTION AND PROCEDURE:**

This policy is applicable to all employees.

RAF Solutions LLP/ HealthcareNLP's disciplinary policy and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behaviour and performance issues.

Following situation will be covered under disciplinary action and there may be some situations which are not mentioned in the list will also be considered as disciplinary action based on seriousness and behaviour of issues.

1. Assault/attempted assault
2. Desertion

3. Sleeping on duty
4. Negligent loss, driving, damage or misuse of company property
5. Abuse of electronic/data facilities
6. Sexual Harassment
7. Fighting
8. Riotous Behaviour
9. Alcohol and drug offences
10. Wilful loss, damage or misuse of company property
11. Theft/Unauthorized possession of company property
12. Breach of Trust
13. Offences related to dishonesty
14. Offences related to Industrial Action
15. Any act or omission which intentionally endangers the health or safety of others, or is likely to cause damage to Company property
16. Interference with disciplinary and/or grievance investigations
17. Abusive or provocative language (when it is likely to cause a disturbance)
18. Insubordination (if the situation shows signs of getting out of control)
19. Persistent refusal to obey instructions.

Outlined below are the steps of the company's discipline policy and procedure. Company reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offence. The level of disciplinary intervention may also vary. Some of the factors that will be considered are whether the offence is repeated despite coaching, counselling or training, the employee's work record, and the impact the conduct and performance issues have on the organization.

1. Counselling
2. First Verbal warning
3. Written warning letter
4. Final warning letter
5. Dismissal

#### **Procedure:**

- When an offence is alleged to have been committed, the immediate concerned Senior/Head of the Department will investigate or have the matter investigated.
- Concerned senior must collect names of all persons who are regarded as witnesses to assist in ensuring a fair hearing of a complain.
  1. Senior/ HOD will discuss the problem and investigate the cause. And based on seriousness will conduct formal or informal counselling.
  2. Counselling/ discuss and listen to employee concern.
  3. Discuss the outcome of the disciplinary action and make the person aware of the consequences of noncompliance with expectation.
  4. If still there is no change in the behaviour of the employee then would be provided oral and written warning/Final written warning.

5. All warnings issued and action was taken shall be recorded in the personnel files of the concerned employees and the same shall be maintained by the HR POC.
6. After all the corrective measure taken by the company has failed to rectify/modify/change the nature or behaviour of the employee and the employee consistently continues to perform offence, then the employee would be dismissed from the services of the company.
7. An employee can only be suspended with prior consultation with the HR POC. The dismissal of employees is to be resorted to as a last measure of disciplinary action, and the action of the dismissal can be taken only by HR POC in consultation with the management, and no Head of the Department or immediate senior be allowed to do the same under any circumstance.

#### **J. CONFIDENTIALITY/NON-DISCLOSURE**

- Employees, officers and directors of the Company must maintain the confidentiality of confidential information entrusted to them by the Company or its suppliers or customers, except when disclosure is authorized by senior management or required by laws, regulations or legal proceedings.
- Confidential information includes all non-public information that might be of use to competitors of the Company, or harmful to the Company or its customers if disclosed.
- An employee should further go through and understand the policy on Protection of Confidential Information as mentioned in the “Non-Disclosure Agreement” (NDA) in detail to ensure they understand and comply all rules and regulations mentioned in the policy document. Non disclosure agreement is applicable to all (employee and consultants) and this will be immediately signed post joining Raaf/Healthcare NLP.

#### **K. LEGAL/REGULATORY COMPLIANCE:**

- All employees shall at all times ensure compliance with all the relevant laws and regulations affecting operations of the Company. They shall be aware of the latest developments in relevant laws, rules and regulations related to their area of work. It is the policy to abide by the national and local laws of nations and communities in which business of the Company is conducted.

#### **N. INTELLECTUAL PROPERTY RIGHT**

The IPR policy applies to all employees at RAF Solutions LLP/ HealthcareNLP

- The policy broadly states that invention, intellectual property and other results of work. In this document "results" means tangible and intangible products and methods that have been discovered, invented, processed, refined or in any other way are connected to intellectual or manual work during the employment with RAF Solutions LLP/ HealthcareNLP are sole right/property of the company
- It states that employees need to communicate to the management if he/she willing to develop any new or advanced method of improving designs, processes, formula, systems, etc. in relation to the business, operations of the company. And it will be sole right/property



of the company during the course of employment and even after employees leave the organization

- It is understood that the Company holds sole copyrights, trademarks and proprietary rights to all the work the Employee creates during his association with the Company.
- The Company shall have sole and exclusive ownership of all rights, title, and interest in and to the information including ownership of all copyrights & trade secrets pertaining thereto, other than the rights & privileges expressly granted by the Company.
- The Company claims and reserves all rights and benefits afforded under Indian & International copyright, trademark, patents and IPR protection and all other laws for all information supplied. The binary or object code version of software programs supplied as information may under no circumstances be reverse-engineered or reverse-compiled without the Company's further written consent. The information including the source code version of all software programs and all software development processes, technical or business processes that may be included in the information is considered to include valuable trade secrets of the Company or the Partner as the case may be.

#### **O. IMPORTANT DO'S AND DON'T:**

- All employees must wear the ID and lanyard at all times while they are in office.
- Management encourages an open and friendly work environment. However, employees are required to conduct themselves in a professional manner and practice professional etiquettes while working, interacting, attending meetings and also during break timings.
- Employees are expected to follow "acceptable behaviour" while interacting with colleagues, seniors, juniors and must avoid the use of derogatory, indecent remarks, and comments.
- Employees should ensure that they practice utmost professional etiquette while interacting with clients, vendors, candidates.
- Employees shall strictly not invite any family/friends/personal CA/Personal insurance agent to company premises
- Employees should make judicious use of all infrastructure and working tools are given to them and must take due care of all office property to prevent damage or loss.
- Employees should make sensible use of break times given for Lunch, Tea Breaks to ensure they take a required break but resume work to complete assigned tasks for the day.
- Employee shall provide all records that are asked by the HR department for maintaining employee file. Employee shall give update on change in address, skills etc through HRIS and inform to the HR immediately
- To ensure maximum productivity, the employee should avoid unnecessary chit chat which may intervene and bother other employees and may also affect their own productivity and efficiency.

- Employees using company mobile or landline phone should ensure its judicious use. Employees should avoid making personal calls from company-provided phones, landline unless it is an unavoidable and urgent situation.
- An employee is allowed to bring the personal mobiles in premises but to take or make the call, an employee must go out of the Office
- Employees should always ensure acceptable etiquettes while talking on the personal phone in break timing.
- The employee should also avoid using office hours for carrying out their personal work.
- Employees are required to discuss daily work priorities with concerned Reporting/ Line manager and agree upon work deliverables.
- Employees are required to update the status of work deliverables, assigned projects on a daily basis before closing days work.
- The employee should ensure that they follow daily productivity norms as defined by respective reporting managers, operations heads and ensure maximum utilization of working time in delivering targets and key result areas.

## 16. PREVENTION OF SEXUAL HARRASSMENT (POSH) Policy

RAF Solutions LLP/ HealthcareNLP is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” of India and existing rules framed thereunder namely the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

RAF Solutions LLP/ HealthcareNLP is of the firm belief that a safe and secure work environment leads to higher participation from employees and thus higher productivity. Hence it is committed towards employees’ right towards a safe, secure, dignified and an enabling work environment within its premises. In this context it has formulated this policy. The ultimate objective is to provide a safe and secure working environment free from sexual harassment for all women at the workplace.

The Company is firmly committed to maintaining a workplace based on our collective values that stress the quality of our products and services, and the need for all employees to treat each other with dignity, fairness, and respect. This Anti-Harassment and Non-Discrimination Policy has been adopted in furtherance of that commitment and supplements the Company's Code of Business Ethics and Conduct. Therefore, it is the responsibility of each employee to ensure that the concepts of non-harassment and non-discrimination are understood, abided by, and carried out by everyone.

### Policy Objective

Objective of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it. To define clear guidelines for prevention, prohibition and redressal of sexual harassment of women at workplace through orientation, awareness and sensitization sessions.

Provide a detailed framework for redressal of such complaints of women at work place. Prohibit unwelcome behavior that constitutes workplace sexual harassment with women.

## **Scope**

This policy shall be applicable to all employees of RAF Solutions LLP/ HealthcareNLP., both permanent, or on probation. It also includes any associate engaged on a fixed term contract and on short term engagements like part time, summer trainees, employees on contract, consultants, employees under probation as well as customers, vendors & suppliers and their respective agents / employees, and all visitors at any of our premises. It also applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

This policy does not prevent any aggrieved person from taking recourse to the law of the land.

## **Key Definitions**

(a) “Aggrieved Individual” means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.

(b) “Complainant” is any aggrieved individual (including a representative, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy. (c) “Employee” as defined under the Act and means a person employed with the Company for any work on permanent, temporary, part-time, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, who with or without the knowledge of the Principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name. (d) “Employer” means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and will include the management personnel.

(e) “Internal Committee” means and include an Internal Complaints Committee (hereinafter referred to as the “ICC”). (f) “Member” means a member of the ICC. (g) “Presiding officer” means the presiding officer of the ICC and shall be a woman employed at a senior level at the workplace amongst the employees. (h) “Respondent” means a person against whom a complaint of alleging sexual harassment has been made under this policy. (i) “Parties” means collectively the complainant and the respondent.

(j) “Sexual Harassment” includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):

“Sexual harassment” includes any one or more of the following unwelcome act or behavior (whether directly or by implication) namely: i) Physical Contact and advances; or ii) A demand or request for sexual favors; or

iii) Making any kind of derogatory remarks based on such as but not limited to appearance, gender, color iv) Making gestures v) Showing or circulating pornography; or vi) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

Following circumstances in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment

i) Implied or explicit promise of preferential treatment at work; or ii) Implied or explicit threat of detrimental treatment at work; or iii) Implied or explicit threat about present or future employment status; or iv) Interference with work or creation of an intimidating or offensive work environment; or v) Humiliating treatment likely to affect health, safety or self-esteem

**What’s Not Sexual Harassment:** Within limits, following are acceptable and not considered as instances of sexual harassment:

i) Performance counseling ii) Social interaction iii) Showing concern iv) Encouragement v) Polite compliment vi) Friendly conversation

### **Prohibition on discrimination and harassment**

It is Company policy to hire, train, promote, compensate, and administer all employment practices without regard to race, color, sex, sexual orientation, age, veteran status, marital status, religion, medical condition, national origin, disability unrelated to the ability to perform essential job functions, or on account of membership in any protected category under federal, state, or local laws. Harassment of employees or applicants because they are members or affiliated with members of any of the foregoing protected groups is also prohibited and will not be tolerated. The Company will take appropriate measures in response to any such incidents that are reported. Every good faith effort will be taken by the Company to fulfill the objectives of this policy.

The Company believes that every employee has the right to work in an environment free of harassment and discriminatory conduct, joking, or epithets. Such behavior does not advance the purposes of the Company; it is also morally wrong and may subject the Company to legal exposure in certain circumstances. Consequently, any employee who engages in these types of prohibited conduct will be subject to disciplinary action, up to and including discharge from employment.

### **Conduct Constituting Prohibited Sexual or Discriminatory Harassment**

Sexual harassment (due to one’s gender) is one of the forms of harassment prohibited by this policy. The Company prohibits certain sex-related conduct regardless of whether it amounts to unlawful sexual harassment, as such conduct is deemed to be inconsistent with the Company’s policy of promoting tolerance, respect, and dignity in the workplace.

Following are illustrative of conduct that the Company condemns and prohibits under this policy: It is prohibited for any person to condition a benefit such as a certain salary or promotion on the granting of sexual favours or the establishment or continuance of a personal relationship, or to

imply to an employee that an award of such a benefit is conditioned upon the granting of sexual favor or the establishment or continuance of a personal relationship;

It is also prohibited for any employee to state or imply that another employee's performance is attributable in whole or in part to the employee's sex or membership in any protected -group categories under federal, state, or local laws;

It is also prohibited for any employee to state or imply that a fellow employee's promotion in the corporate hierarchy is the result of granting a sexual favor or establishing or continuing a personal relationship; and, It is also prohibited for any person to engage in any type of conduct that has the effect of unreasonably interfering with another employee's work or creates an intimidating, hostile, or offensive work environment.

As an employee of the Company, you should be aware that the issue of whether behaviour constitutes harassment or discriminatory conduct might depend on how that behaviour is viewed by the employee who is subjected to the behaviour. Any employee who initiates or persists in such prohibited behaviour assumes the risk of violating this policy in the event that the person who is the object of the behaviour views it as offensive; accordingly, such an employee may be subject to discipline even if his or her conduct might not have been intended as offensive.

### **Conduct Constituting Sexual or Discriminatory Conduct, Joking, or Epithets**

Following are illustrative of conduct that the Company condemns and prohibits under this policy:

It is prohibited for any employee to bring any item to the work premises for purposes of an offensive sexual or discriminatory joke or epithets

It is also prohibited for any employee to use Company property, computers, bulletin boards, documents, or e-mail or voice mail systems for purposes of an offensive sexual or discriminatory joke or epithet;

It is also prohibited for any employee to deface Company property or the personal property of anyone else for purposes of an offensive sexual or discriminatory joke or epithet;

It is also prohibited for any employee to utter or utilize any offensive sexual or discriminatory jokes or epithets at work, or when referring to or about any other person, be they an employee or a non-employee;

It is also prohibited for any employee to harass anyone else due to their sex, sexual orientation, race, color, ethnic background, age, national origin, religion, marital status, disability, or other protected group status; and,

It is also prohibited for any employee to view, bring to or display in the workplace any materials having an offensive content (such as pornography or due to a demeaning reference to another's protected-group status), or to circulate or disseminate any such materials through the Company's internal mail or e-mail systems.

### **Workplace**

Workplace would include the following: 1. All offices or other premises where the Company's business is conducted. 2. All locations where company related activities are performed away from the company premises. All locations where social, sports, training, business or other functions are conducted where the conduct or comments may have an adverse impact on the workplace or workplace relations.

## Procedure & Guidelines

For the purpose of investigating a complaint of workplace sexual harassment by the aggrieved person, an Internal Complaints Committee (ICC) shall be established by the organization. The committee shall have a tenure of 3 years.

This Committee shall consist of:

1. Chairperson (female)
2. Member cum Secretary (female)
3. Member (female)
4. Member (male or female)
5. Member (female - external)

## Composition of Internal Complaints Committee

Pursuant to the relevant provisions of the Act, an Internal Complaints Committee (ICC) has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same. Below is the list of members of the ICC constituted by the Company:

PARTICULARS	MEMBER NAME	DESIGNATION	PHONE	EMAIL
Presiding Officer	Chetana Patel	Head of HR	9537379529	<a href="mailto:Chetana.p@healthcarenlp.com">Chetana.p@healthcarenlp.com</a>
Member	Surbhi Shah	Center Head	9377332475	<a href="mailto:surbhi.s@shaip.com">surbhi.s@shaip.com</a>
Member	Mun P. Lakra	HRBP	7042966443	<a href="mailto:mun@raapid.ai">mun@raapid.ai</a>
Member	Suparna Das Gupta	Associate Director Mating & Communication	9008997589	<a href="mailto:suparna@raapid.ai">suparna@raapid.ai</a>
External Member (Independent)	Harmeet Davar (The Pink Foundation)	Partner Consultant	9824023204	<a href="mailto:Harmeet.tpf@gmail.com">Harmeet.tpf@gmail.com</a>

## Complaint of Sexual Harassment

### Raising of Complaint

(1) Any aggrieved individual may make in writing, a complaint of sexual harassment to the ICC or through Company's (email id: [posh@raapid.ai](mailto:posh@raapid.ai)) within a period of three (3) months from the date of incident and in case of more than one incident, within a period of three (3) months from the date of last incident. Complaints arising of incidents more than three (3) months old shall not be accepted.

(2) However, the ICC may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further 3 months, if it is satisfied that bonafide circumstances prevented the aggrieved individual from filing complaint within the time limit mentioned in point (1)

hereinabove. The complaint should clearly mention name and available details of both the aggrieved person and the respondent. Anonymous or pseudonymous complaints will not be investigated.

(3) Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative, may make a complaint.

(4) The ICC will officially forward the complaint to the Presiding Officer of ICC within seven (7) days from the date of making of the complaint.

(5) The complainant shall submit six copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

The Complaint must contain the following:

1. Description of the incidents
2. Dates & timings of the incidents
3. Locations where the incident happened
4. Name of the respondents
5. Parties' working relationship

The aggrieved women employee can also take help from a designated person from the HR Dept. who shall be managing the workplace sexual harassment complaint.

## **Redressal Mechanism**

### **Redressal Process**

The Internal Complaints Committee shall follow the process in six stages as mentioned below, for addressing a complaint of workplace sexual harassment:

1. Stage One: Receipt of the complaint - Receive and acknowledge receipt of the complaint - Meet and talk to the complainant to explore options for formal and informal resolution - Informal mechanism (Conciliation) - Formal mechanism (Inquiry) - Respondent and response
2. Stage Two: Planning Carefully - Prepare the file and Consideration
3. Stage Three: Interviews - Prepare an interview plan for the complainant, witnesses and respondent - Assess the completeness of the information collected
4. Stage Four: Reasoning - Analyze and assess the information gathered during the inquiry - Create a timeline to prove the sequence of events related to the complaints - Compare similarities and differences within each of the statements made by interviewees.
5. Stage Five: Findings and Recommendations - Findings and Recommendations
6. Stage Six: Report - Writing the Report

### **Conciliation Process**

The legislation provides for mediation as the first step in complaint handling. If an aggrieved woman demands conciliation between her and the respondent, the ICC is bound to conduct conciliation before initiating an inquiry. Where settlement has been arrived through conciliation, ICC shall record the settlement so arrived and forward the same to the Company to take appropriate actions and provide the copies of the same to the parties. After settlement, no further inquiries shall be conducted by ICC.



## **Enquiry and Role of internal Complaints Committee (ICC)**

If a conciliation agreement fails or a settlement is violated or no request from complainant for conciliation exists, the ICC should then proceed with an inquiry.

The inquiry needs to be completed within 90 days. During the inquiry the ICC has authority to recommend to the employer to transfer either the complainant or respondent to different location or

To grant leave of absence to the complainant as rules stipulate so as to avoid face to face contact. ICC shall provide every reasonable opportunity to the complainant and the accused for putting forward and defending their respective case.

The ICC shall have the right to terminate the inquiry proceeding or to give an ex-parte decision on the complaint or the accused fails without sufficient cause, to present herself or himself for three consecutive hearings.

On completion of the inquiry, the ICC should submit its report with its recommendations to the employer within 10 days. Disciplinary action may include compensation to be paid to the complainant by the respondent. The ICC can decide the quantum of compensation to the complainant in tune with the gravity of offence and the stipulation in the Service Rules. The employer is bound to implement the recommendation of ICC within 60 days of receipt.

During the inquiry, principles of natural justice must be followed, that is, both the parties should be given an opportunity of being heard and a copy of the findings may be made available to them enabling them to make representation. If the ICC, during the inquiry, finds that there is a prime facie evidence of serious criminal nature, the complaint will have to be passed on to the police within 7 days. The police should take further action on the complaint treating it as an allegation on 'outraging the modesty of woman' under Section 509 of Indian Penal Code. The court, when setting the case, can award a payment to the aggrieved women on account of emotional distress, mental trauma or pain, as well.

### **Report**

The Complaint Committee will prepare a final report after the investigation and contain the following elements:

A description of the different aspects of the complaint;

A description of the process followed;

A description of the background information and documents that support or refute each aspect of the complaint;

An analysis of the information obtained; V. Finding as stated above

### **Recommendations may include any of the following:**

Disciplinary action, including a written apology, reprimand, warning, censure to the perpetrator and a copy of it maintained in the employee's personal file:

Withholding promotion/pay raise/increment:

Suspension or Termination;

Counselling

Written warning to the perpetrator and a copy of it maintained in the employee's file.

Change of work assignment/ transfer for either the perpetrator or the victim.

The Complaints Committee may also recommend financial damages to the complainant, while deciding the amount they shall take in to consideration:

Mental trauma, pain, suffering and emotional distress caused;  
Medical expenses incurred;  
Loss of career opportunity;  
Income and Financial status of the respondent.

### **Disciplinary Action**

Disciplinary action (if any) shall be initiated by the HR Dept. as per the recommendations of the Internal Complaints Committee in line with the Service Rules / Standing Orders / Policies of the Organization within sixty days of the receipt of the recommendation and update both the complainant and the Management on the action taken.

### **Important timelines of the Process**

Submission of the complaint	Within 3 months of the last incident
Notice to the Respondent	Within 7 days of receiving complaint
Completion of inquiry	Within 90 days
Submission of Report by ICC to Mgmt.	Within 10 days of completion of inquiry
Implementation of recommendations	Within 60 days
Appeal	Within 90 days of recommendations

### **Information Confidentiality**

The entire information collected and documented in the case shall be kept fully confidential by all the parties involved here. Leakage of any of this confidential information by any party involved would invite a penalty of Rs.5000/- in addition to strict disciplinary action.

### **Protection to Complaint/Victim**

The Company is committed to ensuring that no women employee who brings forward a harassment concern is subject to any form of reprisal.

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

### **Prevention Mechanism**

The Organization shall champion the prevention of prevention, prohibition and redressal of sexual harassment of women at workplace through scheduled orientation, awareness and sensitization sessions all employees from time to time.

The company shall also take preventive steps based on the feedback from women employees on a regular basis

### **Monitoring Mechanism**

The Internal Complaints Committee shall submit an Annual Report to the Management which should contain the following details: (CAN WE DESIGN A STANDARD TEMPLATE FOR THIS AND ADD IT AS AN ANNEXURE ALONG WITH THIS POLICY)

1. Number of complaints received in the particular year,
2. Number of complaints disposed of,
3. Number of cases pending for more than 90 days,
4. Number of workshops / awareness programs carried out,
5. Nature of action taken by the employer.

These reports shall be kept in the custody as part of statutory compliances.  
Responsibility towards prevention of Sexual harassment

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

## **17. RAF Solutions LLP/ HealthcareNLP India - POLICY DECLARATION**

You must read all the policies contained in this document and annexure. Company policies are a part of your employment contract and therefore must be read and understood to ensure you are fully aware of your responsibilities as an employee of RAF Solutions LLP/ HealthcareNLP. You are hereby required to sign a separate declaration form confirming your understanding and acceptance of all policies, terms and conditions mentioned in the “Employee Policy Handbook”. You may take the declaration form from the HR POC for further action.

### **Annexure – I**

Note- This list is only for the year 2022



