



BACKGROUND VERIFICATION POLICY



Disclaimer and confidentiality notice

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Document History

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Background Verification Policy

1.0 Objective

Bhavna Software India Private Limited ("Bhavna Corp") is committed to ensuring that its business and organizational missions are supported by qualified employees and that its community is as safe as possible. Bhavna Corp is also committed to taking meaningful actions to protect its finances, property, and other assets. This policy sets forth Bhavna Corp procedures for conducting background checks for all positions.

2.0 Scope

This procedure covers the standard background check process to be followed with all new hires. This Standard Operating Procedure applies to all candidates who are being extended an offer of employment at Bhavna Corp.

3.0 Definitions

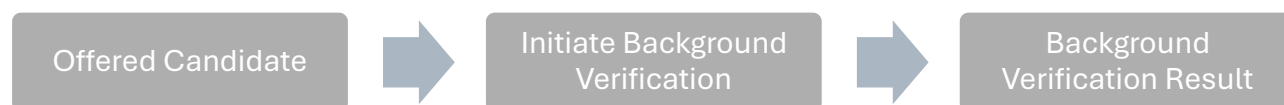
Background Verification - Verification of correctness of information provided by the employee for his/her academic qualification (including degrees obtained and other scholastic records) and professional experience.

Employee File – Employee file stores information obtained about each individual candidate as he/she goes through the recruitment/change in role process. These files can be in hard copy form or electronic format or in a combination of these.

TAG Manager – A company officer authorized to initiate the request to hire staff as required by his/her project/department.

4.0 Background Verification Review

Bhavna Corp shall adhere to the following process, to ensure that all employees undergo thorough background verification.



5.0 Inputs Required For Background Verification

Offered Candidate: All offered candidates will act as input to this process.

Outputs generated from background verification.

- **Background Verification Result**

The output of this process shall enable the HR department to evaluate individuals' eligibility to be engaged with Bhavna Corp. The output shall confirm the authenticity of the data/documents provided and highlight any discrepancy found in the same.



- **Background Verification Result Definitions:**

The background verification result will be displayed in three different categories

- Green – All details and documents verified are accurate.
- Amber – The report is not verifiable either for want of sufficient data or lack of response from the verifying authority.
- Red - It is clearly evidenced violation has occurred where there is no possibility of passing on the benefit of the doubt to a candidate.

- **Background Verification Result Definition Approval:**

HR and Management will act for the employees whose background verification Results as below:

- Green – No Action
- Amber – Case to Case Scenario
- Red – Termination

6.0 Background Verification Process For Full Time Employees:

Background checks will cover the following areas:

Types Of BGV Carried Out	Start Time	End Time
Identity Verification	On the date of onboarding of the candidate	Within 30 days from the DOJ
Employment Verification (Last 2 employments)	On the date of onboarding of the candidate	Within 30 days from the DOJ
Address Verification	On the date of onboarding of the candidate	Within 30 days from the DOJ
Education Verification	On the date of onboarding of the candidate	Within 30 days from the DOJ
Reference Check	On the date of onboarding of the candidate	Within 30 days from the DOJ
Criminal Record Check	On the date of onboarding of the candidate	Within 30 days from the DOJ

Right to Work Check: Apart from the above-mentioned checks we do right to work check for the employees who are moving from abroad and not Indian citizens. This check is performed internally by the HR team by checking the Overseas Citizenship Of India (OCI) document, however, the report shared by the BGV vendor will not have the details related to the Right to work check.

7.0 Responsibility:

The candidate is responsible for:

- Completing the required questionnaire and uploading the documents after receiving the mail from the service provider.
- Provide necessary information as required by the internal team/service provider and/or about the status of the completed report.



HR Department is responsible for:

- At the time of offer roll-out, the HR Team will inform the candidate through E-mail that Bhavna Corp requires a background check as part of the employment process (each candidate must be informed).
- All the above-mentioned checks are to be initiated on the date of joining and complete the process 1 week after the candidate's joining.
- Receive/review alerts for further information and complete background check reports from the service provider.
- Collecting information from the candidate wherever required and furnishing it to the service provider.
- The right-to-work check will be initiated by HR team internally, by validating the passport and OCI copies. The employee's past employment and passport/OCI document will help to verify the Right to work check.
- Validate continuation of employment of the concerned employee where background checks are returned without discrepancies.
- Discuss disqualifying or potentially disqualifying information with the Hiring manager, HR manager, and Legal Team.
- The decision of HR Head will be final in case of resolving all disputes/interpretation of reports.
- If the candidate is disqualified, notify the hiring manager that the candidate does not meet Bhavna Corp hiring requirements, and accordingly, shall be required to vacate the current position.
- Notify the candidate of the reason for severance through an e-mail.
- Initiate Exit.

8.0 Distribution:

This policy is meant for and distributed among the following people,

- TA Team
- HR Team
- Compliance/ Audit Team

9.0 Ownership:

HR Team is responsible for ensuring that this document is necessary, that it reflects the actual practice, and that it supports the corporate policy.

10.0 Activity Preface:

This activity is performed whenever an external candidate is being considered for a position within Bhavna Corp.



11.0 Prior Activity:

The Background Check process would be initiated only after the onboarding of the candidate.

Applicability

To whom will it be applicable Ex: -

- ✓ All categories of new hires of Bhavna Corp.
- ✓ Employees on contract.
- ✓ Vendor Employees: if they have access to Bhavna Corp PII (Personally identifiable information) or Bhavna Corp customer PII.

12.0 Process For Negative Findings:

- In case of negative findings HR team will take approval from the HR head to onboard the candidate.
- If the status of the verification is Amber, then HR head will provide the deviation approval based on the reason.
- HR and hiring managers can call candidates to discuss the results of their background checks in cases of minor discrepancies (e.g. Reference Check and Employment check) If candidates answer satisfactorily, they may still be hired.

13.0 Policy Revision

- The policy shall be reviewed and revised every year considering the business plan, legal enactment /amendments and other social reasons which are in control of the organization.

14.0 Exception Handling

- Management reserves the right to alter/ change/ modify/ obsolete the content of the policy based on the business needs and priorities of the organization.