



HR POLICY MANUAL

Policies Index

	Page Number
Introduction	
About J M Baxi Group	3
J M Baxi's Vision	4
Values We Live By	4
1) Code of Conduct	5 – 9
2) A - Attendance	10 – 12
B - Leave	12 - 17
3) Dress Code & Uniform Policy	18 – 23
4) Policy on Recruitment & Selection	24 - 34
5) Leave Travel Allowance Policy	35 - 37
6) Policy on Training	38 - 41
7) Entitlements	41 - 48
8) Travel Policy	49 – 51
9) Transfer Policy	52 – 56
10) Whistle Blower Policy	57 – 59
11) Grievance Policy	60 – 62
12) Policy on Prevention of Sexual Harassment	63 - 69
13) A - Anti Bribery and Corruption Policy	70 - 78
B – Anti Money Laundering Policy	78 - 84
14) Policy on Equal Opportunity & Non-Discrimination	85 – 88
15) Human Rights Policy	89 – 91
16) Child Labour Policy	92 - 95
17) IT policy	96 – 101
18) Employment Separation Process	102 - 104

About J M Baxi Group



The J M Baxi Group prides itself in being a 108-year-old business conglomerate within the trade and shipping sector through service offerings in the Marine Services, Ports & Logistics and Technology sector. Professionally managed companies within the group span the entire logistics services value chain including:

- Port facilities | container and multi-cargo port terminals, cruise terminals, container freight stations, inland container depots and rails
- Niche logistics services | bulk cargo, project cargo, offshore installation and ship agency services

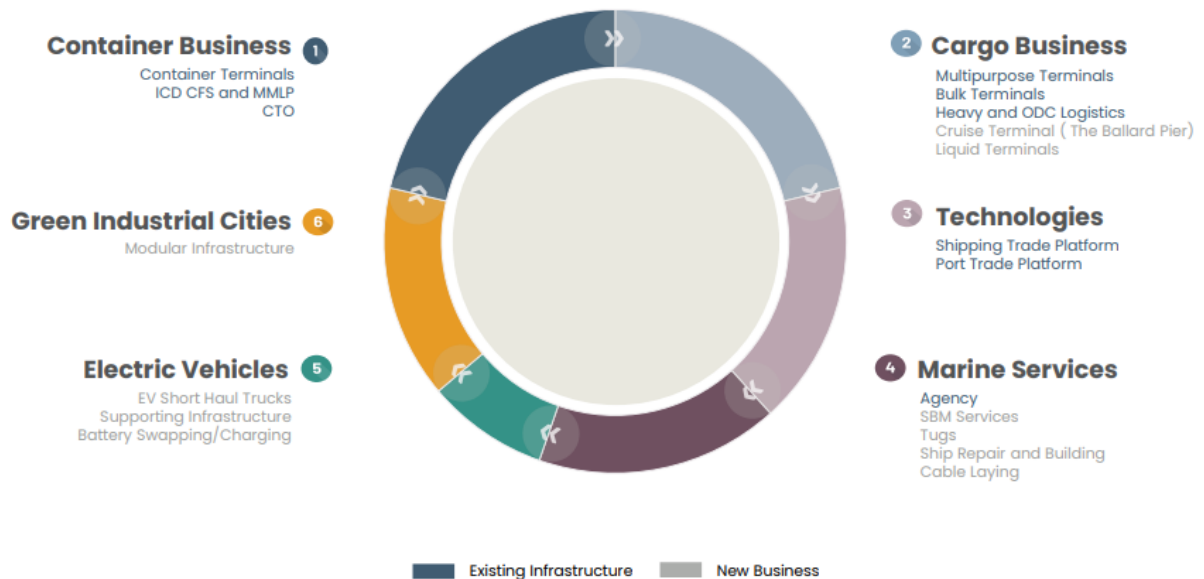
Our verticals

Marine Services: Our long-established data-driven business vertical. Combined, all the marine services companies of the group collectively make the group India's largest professional and integrated marine agency.

Ports & Logistics: As a part of the infrastructure and logistics vertical, the group caters to a need for specially designed shipping logistics infrastructure including port facilities such as container and multi-cargo port terminal.

Technology: This decade-old vertical has a keen presence in water, communications and digital solutions for the maritime trade. The youngest and most dynamic space in the group.

SURGING MOMENTUM : FLY-WHEEL DRIVEN GROWTH



Our Core Values

The four core values that underpin the way J M Baxi Group conducts its business activities are:

Honesty – Honesty in our commitment, deliverables and interaction with both internal and external stakeholders, builds trust, it strengthens relationships and in turn enables progress. This creates a trusting, and responsible work environment.

Humility - The only way to serve and delight customers is with humility. Humility enables a deeper understanding of the needs of people. Be it colleagues, the business partners, our clients, or the communities where we operate. It helps each one of us to serve the people better and increases our impact and effectiveness.

Innovation - We will be the best at what we do with honesty, and creatively focus on ways to be even better. Innovation comes from an idea to make a better world, for ourselves, our families, our communities, our business and the country and everyone we work with.

Perseverance - Be passionate and persevere, do justice to the trust bestowed upon us. We must persevere to always give our clients, principals and partners the very best. This grit and determination must be ingrained in each and every activity that we all undertake in the organisation.



Code of Conduct

Policy History Details	Existing Policy	
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1. Code of Conduct

1.1. Scope and Purpose:

- Code of conduct is compulsory and binding on all the employees.
- Non-observation or breach of code of conduct shall render the employee liable for disciplinary action leading to imposition of major or minor penalty/(ies) or with adverse impact on their career including termination/dismissal.
- The purpose of a code of conduct is to create a safe, respectful, and professional work environment for all employees. It serves as a framework for ethical decision making and helps ensure that employees understand the expectation and consequences of their actions.

1.2. Our Core Principles:

- We are committed to operating our businesses conforming to the highest moral and ethical standards. We do not tolerate bribery or corruption in any form. This commitment underpins everything that we do.
- We shall not compromise safety in the pursuit of commercial advantage. We shall strive to provide a safe, healthy and clean working environment for our employees and all those who work with us.
- We shall strive to balance the interests of our stakeholders, treating each of them fairly and avoiding unfair discrimination of any kind.
- The statements that we make to our stakeholders shall be truthful and made in good faith.
- We expect the leaders of our businesses to demonstrate their commitment to the ethical standards set out in this Code through their own behaviour and by establishing appropriate processes within their companies.
- We shall respect the human rights and dignity of all our stakeholders.
- We shall comply with the laws of the countries in which we operate and any other laws which apply to us. Observation of any laws being violated must be reported to the Legal/HR team.
- We provide equal opportunities to all our employees and to all eligible applicants for employment in our company. We do not unfairly discriminate on any ground,

including race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by any other law.

- When recruiting, developing and promoting our employees, our decisions will be based solely on performance, merit, competence and potential.

1.3. The Code of Conduct is applicable to all the employees in J M Baxi group of companies:

- All the employees shall display complete loyalty towards the Organization.
- All the employees shall follow company rules and regulations framed from time to time.
- All the employees must adhere to the defined dress code as per the Company's dress code policy.
- All the employees shall strictly observe the working hours prescribed.
- All the employees shall follow job instructions given to them by their superiors and achieve their mutually agreed targets.
- Employees must maintain professional decorum while communicating with all stakeholders. Offensive messages, derogatory remarks and inappropriate jokes are never acceptable.
- All the employees shall observe strict moral and ethical standards in their work and personal life.
- The employees shall not criticize Group policies at any point during their employment within or outside the company. If they have any suggestions, they should be routed through proper channel.
- All the employees shall follow the organization hierarchy in accepting orders and giving instructions for work.
- Refusal to obey the instructions of the superior shall be a serious case of misconduct and insubordination.
- All the employees shall work in such a way as to ensure complete personal and professional integrity.
- All the employees shall protect company property and keep the company information confidential.
- Company property should not be misused or let out without proper consent.
- No full-time employee shall accept any part-time or full-time paid job outside the organization.
- No employee will seek membership of any local or public bodies without first obtaining specific written permission from the management.
- No employee shall publish an article written by him or her on any matter relating to the company in any local, national or overseas newspaper, journal, social media platforms or any other publication without the written permission of the management. Any kind of media/legal questions, employees must refrain from interacting directly with press and refer these enquiries to the designated company representative.
- No Employee shall consume or bring alcohol/illegal drug/controlled substances inside the office premises/ workplace nor shall he or she enter the office

premises/workplace in an inebriated state after consuming any kind of alcohol/illegal drug/controlled substances.

- No employee shall either offer or accept a bribe in any form and shall also strictly adhere to the anti-bribery and anti-corruption policy of the company.
- Employee benefits must not be abused, this refers to time off, insurance, facilities, subscriptions or other benefits our Company offers.
- No employee shall be involved in gossiping, passing sarcastic comments or office politics which could cause mental disturbance.
- All acts of misdemeanour if observed must be notified to the HR team and will be kept confidential.
- Employee should not use his/her position, status, powers or authority to seek to improperly influence a decision or action.
- When exercising a discretionary power, employee should ensure that the power/authority is used properly, impartially, and equitably and is consistent with legal and J M B Group guidelines.

1.3.1. List of acts and omissions for which fine can be imposed.

- An employee may be fined for the following acts and omissions. The quantum of the fine will be decided by the Company taking into account the severity of acts and omissions committed by the employee.
- An employee may be suspended or terminated without notice or any compensation in lieu of notice if he/she is found to be guilty of misconduct.

1.3.2. Following acts and omissions shall be treated as misconduct:

- Wilful insubordination or disobedience, whether alone or in combination with others, to any lawful and reasonable orders of a supervisor.
- Theft, fraud, or dishonesty in connection with the Company's business or property.
- Loss in business or additional amount incurred by the Company due to negligence on the part of the employee in his/her official duties.
- Wilful damage to or loss of Company's goods or property.
- Any illegal gratification.
- Habitual absence or absence without prior approval.
- Habitual late attendance.
- Habitual breach of any law applicable to the Company.
- Riotous or disorderly behaviour during working hours in the Company or any act subversive of discipline.
- Negligence or neglect of work.
- Striking work or inciting others to strike work in contravention of the provision of any law, or rule having the force of law.
- Verbal or physical behaviour towards coworkers that crosses the line of acceptable behaviour.

1.4. Bribery and Corruption:

All employees and those representing us, including agents and intermediaries, shall not, directly or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business. (For details, please refer to the ABAC policy).

Business gifts and hospitality are sometimes used in the normal course of business activity. However, if offers of gifts or hospitality are frequent or of substantial value, they may lead to a conflict of interest. Therefore, gifts and hospitality offered or received should be modest in value and appropriate, and in compliance with our company's practice and policies.

1.5. Integrity of information and assets:

- Employees shall not make any wilful omissions or material misrepresentation that would compromise the integrity of our records, internal or external communications and reports, including the financial statements.
- Employees shall seek proper authorization prior to disclosing company or business-related information, and such disclosures shall be made in accordance with our company's media and communication policy. This includes disclosures through any forum or media, including through social media.
- Employees shall ensure the integrity of personal data or information provided by them to our company. We shall safeguard the privacy of all such data or information given to us in accordance with applicable company policies or law.
- Employees shall respect and protect all confidential information and intellectual property of our company.
- Employees shall safeguard the confidentiality of all third-party intellectual property and data. Our employees shall not misuse such intellectual property and data that comes into their possession and shall not share it with anyone, except in accordance with applicable company policies or law.
- Employees shall promptly report the loss, theft or destruction of any confidential information or intellectual property and data of our company or that of any third party.



Leave and Attendance

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2. (A) Attendance

2.1. Working Hours and Weekly Offs:

All the offices of our company will adhere to following office timing:

Shift	Weekdays	Working Hours	
		Companies Other than Terminals	Terminals
General Shift	Monday to Friday	9.30 Hr to 18.00 Hr	Shift Timings will be based on business requirement
		Lunch Break - 13.00 Hr to 13.30 Hr	
Flexi Shift	Monday to Friday	In Time - In Between 8.30 Hr to 10.30 Hr	Shift of 8 Hours / 12 hours etc as applicable
		Out Time - In Between 17.00 Hr to 19.00 Hr	
Weekly Off		All Saturday & Sunday	2 nd & 4 th Saturday, Sunday, as per rotational shift basis, etc. as applicable

All employees would be required to mark their attendance through Attendance Marking Device which is installed in office or through Mobile Application of HRMS software.

Terminal shift timings will be based on business requirement and will be decided by the respective Terminal. Any changes from existing practice will require approval from President & COO – Operations.

2.2. Attendance – General Shift:

- All employees are expected to reach their place of work at least five minutes before the commencement of working hours. However, they are allowed a grace time of thirty minutes while resuming duty as well as to leave early from office

to meet exigencies which include disruption/delay in public transport, traffic jam, etc. as an exceptional case. Employees coming late within grace period will be marked 'Late Mark' for each occasion. Employee can avail grace time facility up to 5 occasions in a month i.e. up to 5 late marks.

- For employees who come late, (Excluding allowed grace period as mentioned) i.e., from 6th late mark onward half a day's annual leave will be debited for every late coming / late mark. In case there is no annual Leave balance left in their credit, salary will be deducted. In case of habitual late coming, the Company may initiate suitable action as deemed fit against those late comers.
- An employee coming to office after 10.00 Hr will be considered as half day.
- Employee should work minimum 4 hours to be marked half day present and minimum 8 hours to be marked full day present.
- All Employees are expected to adhere office hours including lunch timings. In case of an employee leaving the office premises during the office hours without proper authorization, management may take appropriate action.

2.3. Attendance – Flexi Shift:

- An employee coming to office after 10.30 Hr will be considered as half day.
- Employee should work minimum 4 hours to be marked half day present and minimum 8 hours to be marked full day present.
- Employees in flexi shift must adhere to timings in consultation / approval of their HOD / competent authority which would be decided on the basis of business requirement.

2.4. Outdoor Duty:

Employees who are attending to outdoor work directly from their residence or leaving early from the office to attend outdoor work are required to obtain permission/approval from their HOD and apply for OD through HRMS system.

2. (B) Leave Policy

2.5. Objectives:

The objective of this policy is to regulate all forms of leaves which are applicable to employees as a benefit, and to outline procedures to be followed for the granting and taking of such leaves.

2.6. Scope:

Applicable to all employees, Consultants, Retainers and Trainees.

2.7. Leave Year:

Financial year (1st April to 31st March)

2.8. Classifications of Leave:

1. Annual Leave (AL)
2. Sick Leave (SL)
3. Maternity Leave (ML)
4. Paternity Leave (PL)
5. Special Leave (SPL)
6. Leave Without Pay (LWP)
7. Compensatory Off (CO)
8. Transfer Leaves (TL)
9. Unauthorized Absence (UA)
10. Volunteering leave (VL)

2.8.1. Annual Leave (AL):

➤ **Employees, Consultants and Retainers**

- 30 days per financial year.
- Calculated on pro rata basis from Date of joining. If any employee joins before 15th of any month, then whole month to be considered for calculation leave. If joining after 15th of any month, then for leave calculation it is to be considered as 50% of leave.
- During 1st year of service, it will be credited on date of joining of an employee and subsequently on 1st April of each Financial Year.
- It can be availed for Full /Half Day.
- Max. 12 days leave can be taken at a time. Leave exceeding 12 days need approval from Business Head / Terminal Head / CEO / Competent Authority.
- For availing 3 days or more leave, at least 10 days' prior notice to be given by the employee. At the end of each Financial Year, unavailed / balance leaves shall lapse.

➤ **Trainees**

- 10 days per financial year.
- Calculated on pro rata basis from Date of joining. If any employee joins before 15th of any month, then whole month to be considered for calculation leave. If joining after 15th of any month, then for leave calculation it is to be considered as 50% of leave.
- During 1st year of service, it will be credited on date of joining of an employee and subsequently on 1st April of each Financial Year.
- It can be availed for Full /Half day.
- At the end of each Financial Year unavailed / balance leaves shall lapse.

2.8.2. Sick Leave (SL):

- 10 days per financial year.
- Calculated on pro rata basis from Date of joining. If any employee joins before 15th of any month, then whole month to be considered for calculation leave. If joining is after 15th of any month, then for leave calculation it is to be considered as 50% of leave.
- During 1st year of service, it will be credited on date of joining of an employee and subsequently on 1st April of each Financial Year.
- It can be availed for Full /Half Day
- Medical certificate required in case Sick Leave exceeds 3 days at a stretch.
- In case of infectious or contagious diseases a fitness certificate from a medical practitioner is required.
- At the end of each financial year unavailed / balance leaves can be carried forward & accumulated up to 60 days. Encashment of leaves will not be permitted.
- Advance SL can be sanctioned by the HOD in consultation with the Business Head / Terminal Head / CEO / Competent Authority. The same will be adjusted against future entitlement. The maximum number of such sanction of advance SL should not exceed more than 10 days in a financial year.
- Combination of Annual Leave with Sick Leave may be permitted provided the application for Sick Leave is supported by proper medical certificate and only on exhaustion of Sick Leave.
- **Trainees:** All the above-mentioned SL rules are applicable to Trainees also.

2.8.3. Maternity Leave (ML):

- Every female employee is entitled to maternity leave as per provisions of the Maternity Benefit Act 1961.
- Female employee must work for minimum 80 days in the 12 months immediately preceding the date of her expected delivery.
- Maternity leave will be allowed up to 26 weeks leave for the first 2 children. (i.e. 8 weeks before and 18 weeks after expected date of delivery)
- This benefit will not be applicable in case the employee is covered under ESI scheme. In such cases, the benefit will be given as per the provisions of the ESI Act 1948.
- To avail maternity leave, employee will have to apply at least 8 weeks before the expected due date and along with a certificate from the gynaecologist stating the expected date of delivery.
- For women who are having 2 or more surviving children, the duration of paid maternity leave shall be 12 weeks (i.e. 6 weeks before and 6 weeks after expected date of delivery).
- In case of adoption of a child up to 3 months, female employees will be eligible for 12 weeks leave.
- 6 weeks leave for miscarriage is sanctioned on production of doctor's medical certificate. This leave is sanctioned from the date of miscarriage.
- On the expiry of the Maternity leave period, the employee concerned is expected to resume duty.
- All leaves under Maternity Benefits Act are inclusive of all weekly off & Paid holidays.

2.8.4. Paternity Leave (PL):

- Male employees will be eligible for 5 days leaves.
- Paternity leave can be taken for first 2 children only.
- Paternity Leave can be availed within 30 days after delivery.
- It is to be availed at stretch and not in breaks.
- Paternity leave is also applicable in case of adoption of child.
- Provisional Birth Certificate to be submitted on resuming duty.
- At the end of each Financial Year, unavailed / balance leaves shall lapse.

2.8.5. Special Leave (SPL):

- If an employee while on duty, meets with an accident and if employee is unable to attend office, then special leave may be granted as per Management Discretion.
- This leave may be granted as per Management discretion under extra-ordinary circumstances and only on exhaustion of all Leaves.

2.8.6. Compensatory off (CO):

- **Terminals:**
 - As per existing practice this is applicable to only Assistant Manager & Below employees.
 - If an employee works on weekly off or paid holiday and completes full shift hours, then employee is eligible for One Compensatory Off.
 - If an employee works additional hours beyond normal shift hours, then employee will be eligible for half day Compensatory Off for working minimum 4 hours and full day Compensatory Off for working minimum 8 hours.
 - Working on Weekly Off and Paid holiday as well as working additional hours beyond normal shift hours should be with prior consent of the Business Head / Terminal Head / CEO / Competent Authority.
 - Comp off should be availed within 60 days of credit or else it will expire.
 - Comp off cannot be clubbed with any other leaves or encashed.
 - Maximum 2 comp offs can be earned in a month.
 - At the end of each Financial Year, unavailed / balance leaves shall lapse.
- **Companies other than Terminals:**
 - This is applicable to only Assistant Manager & Below employees.
 - If an employee works on weekly off or paid holiday, then employee will be eligible for half day Comp. Off for working minimum 4 hours and full day Comp. Off for working minimum 8 hours.
 - Working on Weekly Off and Paid holiday should be with prior consent of the HOD / competent authority.
 - Comp off should be availed within 60 days of credit or else it will expire.
 - Comp off cannot be clubbed with any other leaves or encashed.
 - Maximum 2 Compensatory Offs can be earned in a month.
 - At the end of each Financial Year, unavailed / balance leaves shall lapse.

2.8.7. Transfer Leaves (TL):

In case of transfer of an employee from one location to another location (Intercity), a maximum of 7 days leaves will be granted which includes travel time, packing and relocation at both ends.

2.8.8. Unauthorized Absence (UA):

In case an employee proceeds on leave without approval of the competent authority, then employee will be marked absent from duty and such absence will be treated as unauthorized absence and without pay. This unauthorized absence will include weekly off and paid holiday.

If such absence exceeds 8 consecutive days, the management may initiate suitable disciplinary action against such employees. Unauthorized absence is treated as serious misconduct.

2.8.9. Volunteering leave (VL):

In case an employee wants to volunteer a day in a year towards upliftment and development of women 1 (One) day paid Volunteering Leave (VL) can be availed per year for this purpose. VL shall be applicable to all permanent employees of the group. To avail VL, employees shall apply in HRIS.

2.9. General Conditions for AL/ SL/ SPL/ ML:

- Leave cannot be claimed as a matter of right and the discretion for grant or refusal of the leave lies solely with the Competent Authority.
- For availing any leave, employee must obtain prior approval from Competent Authority.
- All leaves will be excluding weekly off and paid holidays unless specified otherwise against respective leave type in this policy.
- Combination of Sick Leave & Annual Leave with Maternity leave may be permitted provided the employee submits application along with Medical Certificate in support of extension of Maternity leave. Sick leave and Annual leave can only be combined on exhaustion of Maternity leave, Sick Leave & Annual Leave, in that order.
- In case of transfer of an employee to other group company, all leave balance will be carried forward to the employee's account.
- Encashment of unavailed Annual leave for maximum up to 30 days will be done at the time of full and final settlement for pro rata basis for an employee at the time of retiring / death case.

2.10. Leave Application:

- Leave application should be submitted by the employee through the HRMS system.

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- For those employees who do not have access to HRMS, Leave Applications (Form No. 8) duly approved by the Competent Authority should be sent to respective HR department or nominated person.
 - Leave rules may be amended/modified/revised/withdrawn at the sole discretion of the Management at any time without any notice.





Dress Code & Uniforms Policy

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3. Objective – Dress code and Uniforms Policy

J M Baxi Group employees contribute to the corporate culture and reputation in the way they present themselves. These standards are equal with our organizational practices of appropriate business conduct, professionalism, and dress code.

A professional appearance is essential to a favourable impression with customers, regulators, and company shareholders. Good grooming and appropriate dress code reflect employee pride and inspire confidence on the part of such persons.

Procedures

Every department manager / HR head may exercise reasonable discretion to determine appropriateness in employee dress and appearance. If an employee does not meet a professional standard, he/she may be counselled and/or sent home to change.

Intent

J M Baxi Group requires all employees to present themselves in a professional manner, regarding attire, personal hygiene and appearance.

This policy shall discuss:

1. Dress Code for Terminal & Office Locations
2. Appropriate Business Attire
3. Appropriate Business Casual Attire
4. Dos and Don'ts
5. Workplace inappropriate attire
6. Compliance
7. Sustainability
8. Safety Equipment

3.1 Dress Code

– Terminal Locations

- Monday to Thursday – Uniforms will be provided for all employees at the terminals (Men will receive fabric for 3 shirts & 2 pairs of pants, Women will receive fabric for 3 Shirts/kurtas & 2 pairs of pants). For certain identified operational roles, the uniform will consist of t-shirt and pants (3 T-shirts & 2 pairs of pants)/ 2 Boiler suits. The uniforms will have to be tailored locally as per the specifications provided by the Corporate Communications team.
- Friday & Saturday - Appropriate Business Casual Attire

– Office Locations

- Monday to Thursday - Appropriate Business Attire
- Friday & Saturday - Appropriate Business Casual Attire

3.1 – A - Appropriate Business Attire

Every J M Baxi Group employee is required to wear appropriate business attire or uniform for terminals. The business attire or uniform in case of Terminals to be followed from Monday to Thursday.

Appropriate Business Attire includes -

- Men – Full sleeve formal shirts and pants, formal blazers/suits, sweaters, uniform, and formal shoes.
- Women – Full/half sleeve formal shirt and pants, uniform, formal dresses, salwar kurta, leggings, formal palazzo, formal saree, formal dresses, formal skirts (knee-length or more), blazer/suits, sweaters, pantsuits, and formal footwear.

3.1 – B - Appropriate Business Casual Attire

- Friday for Offices
- Friday and Saturday for Terminals (Unless specified otherwise)

Every J M Baxi Group employee is required to wear appropriate business casual attire on Fridays for Offices and on Fridays and Saturdays for Terminals.

- Men - Collared T-shirts, denim
- Women – Collared T-shirts, formal tops, denim pants, dresses or skirts (knee-length or more)

3.2. Dos and Don'ts

- Footwear on all workdays would include formal shoes for men and formal footwear for women.
- Slippers, floaters, and any other form of casual footwear shall not be allowed.
- Sports shoes on formal wear days shall not be allowed.
- J M Baxi Group employs a “Casual Attire” policy, wherein our employees are welcome to wear workplace appropriate jeans (no rips, tears, or stains).
- While Casual Attire allows our employees to dress in a more casual fashion, employees should take into account the necessity to continually conduct themselves in a professional fashion, and dress in such a way that will not create a negative perception by customers, either internal or external.

3.2.1 Inappropriate Attire (also applicable to Casual Attire)

The following items are not permitted in any area during normal working hours:

- Sweatpants

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- Jogging pants
 - Three fourth pants, capris, jump suits
 - Gym shorts
 - Bicycle shorts or other athletic shorts
 - Mini skirts
 - Any form of clothing that is generally offensive, controversial, and disruptive. Any form of clothing that is overtly commercial, contains political, personal or offensive messages
 - Plastic flip-flops or sandals
 - Beach footwear
 - Inappropriate Accessories

3.3 Compliance

- If an employee does not meet a professional standard may be sent home to change and will not be paid for that time off.
- Continuous non-compliance to appropriate attire standards will result in employee counseling and/or disciplinary action.
- Personal appearance standards may be reviewed periodically and updated as deemed necessary.
- Every J M Baxi Group employee is responsible for always exercising sound judgment and common sense for his or her attire.
- If an employee is deemed to be wearing inappropriate attire, his/her manager is responsible for coaching the employee accordingly.
- Theme days are occasionally approved by Sr. Vice President – Corporate HR when a deviation from these guidelines is appropriate, and when the business necessities will not be affected.
- Individual situations relating to appropriate workplace attire may be addressed on a case-by-case basis.

3.4 Sustainability

- Sustainability is an important factor which Employees are encouraged to consider.
- Employees are encouraged to buy from sustainable brands with transparent supply chain.
- Employees are encouraged to choose natural fibers and single fiber garments.

3.5 Safety Equipment

Strictly Confidential | For internal circulation within J M Baxi Group only

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- Personal/Protective safety equipment must be always worn in areas where such equipment is required.





Recruitment Policy

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4. Objective – Recruitment & Selection Process

HR is a strategic business partner in the organisations endeavour to become the more desired place to work in our sector.

To be able to grow and sustain ourselves in this ever-changing business environment, we need the best talent, who have the right attitude and motivation and an approach that fits our culture.

For this purpose of Recruitment, the organisation clearly focuses on developing an effective philosophy and strategy that facilitates the organisation's vision.

Scope

The Policy covers recruitment procedures applicable to all onroll employees of J M Baxi Group.

Guidelines:

- J M Baxi group is committed to establishing and maintaining a non-discriminatory and inclusive culture in all its offices, which provides an equal opportunity to get employment and pursue a career irrespective of disability, besides religion, caste, creed, gender, region or place of birth.
- The main objective of this policy is to recruit the right people for the right jobs.
- All hiring is done as per approved Manpower Requisition Forms (MRF)
- All candidates for Management cadre (M19 – M1) are required to possess a Bachelor's degree for consideration for employment within the organisation. A candidate whose highest qualification is 10+2/Diploma may be considered only after sign-off from Business Unit Head & CHRO on an absolute exception basis.

4.1 Organisation hierarchy

Grade	Designations	Cadre	Band	
S-3	Peon/Office Attendant /Daftary	Non-Management Support Category	Non Management	
S-2	Clerk			
S-1	Sr. Clerk/Assistant			
F-3	Operator/Technician	Non-Management Functional Category		
F-2	Foreman			
F-1	Shift In-charge			
M19	Senior Officer (Applicable only for NSFT)	Management Grades	Junior Management	
M18	Officer (Applicable only for NSFT)			
M17	Junior Officer (Applicable only for NSFT)			
M-16	Jr. Executive			
M-15	Executive			
M-14	Sr. Executive			
M-13	Assistant Manager		Mid Management	
M-12	Deputy Manager			
M-11	Manager			
M-10	Sr. Manager			
M-9	Assistant General Manager			
M-8	Deputy General Manager			
M-7	General Manager			Senior Management
M-6	Senior General Manager			
M-5	Assistant/Deputy Vice President			
M-4	Vice President			
M-3	Senior Vice President /Deputy COO			
M-2	COO/President			
M-1	CEO/Exe. Director			

All Businesses will drive their recruitments & will be supported by Corporate HR for any Critical or Leadership Hiring.



4.2.1 Application Form

- HR to ensure that the candidate will receive communication regarding interview feedback , within 2 weeks of the interview.

4.2.5 Outstation Candidates

- For Candidates based outside the work location the first round may be scheduled
- Outstation candidates travelling for interview may be reimbursed as per Inland travel rules of the company.

4.2.6 Interview Panel

Designation	Interview Panel
Below General Manager	Reporting Manager, Business Head/Terminal Head, Respective HR Head. Corporate Panel only for critical role holders.
General Manager & Above	Business Head/Terminal Head President & COO and the Terminal Head(for Ports & Logistics)), Member of Corporate HR team/&CHRO. All General Manager & above hiring to be approved by MD before offer roll out.

4.2.7 Pre-employment Medical Test

- Pre-employment medical check-up to be done for all onroll applications as per the standard test format shared by Corporate HR.
- Applicants will be reimbursed upto INR 3000/- for the medical test conducted.
- The test report to be certified by the registered Medical Practitioner with stamp and signature of the doctor. The doctor should be MBBS.
- Test reports along with certified medical form to be shared with empaneled doctor to advise on the fitness.
- Based on the medical fitness, formal offer letter to be released, priority offers released before medical fitness will be subject to Management approval.

4.2.8 Background Verification & Reference Check (To be conducted by empaneled, 3rd party agency)

Background Verification ensures that we hire right candidates by mitigating risk associated with the recruitment process. Background Verification would be carried out by independent third party empaneled agency in line with below guidelines. Reference check shall be initiated upon release of offer.

Lateral Recruitment

No	Standard Checks	Description
1	Education Check (Highest Qualification)	Verifying the authenticity of candidate's educational & professional qualifications & degrees
2	Employment Verification from last 2 employers	Verifying the period of employment, designation, remuneration, manager, reason for leaving.
3	Manager Feedback for last 2 employers	Verification of candidates' professional experience and inputs on personal attributes like integrity etc
4	Court Records Search	Court searches covering criminal & civil litigation records

Fresher Recruitment

Off Campus: Education verification would be done by empaneled agency.

Standard Check	Description
Education Check (Highest Qualification)	Verifying the authenticity of candidate's educational & professional qualifications & degrees

On Campus

- For all Campus Recruitments, the selected candidate need to obtain character certificate from their colleges

4.2.9 Reference Check

- For all Leadership & Critical roles, 2 reference checks should be conducted prior to the offer role out. These can be independent reference checks/reference checks with names taken from the candidate.
- The focus should be on performance, business acumen, technical skills, leadership ability, drive for results, Interpersonal Relation, cultural fit, ethics/Integrity, development areas & overall feedback. (We can share the form annexure here)
- The same can be captured over a call/email and feedback of the same should be documented along with the details of the referee.

4.2.10 Joining Announcement, Induction & Relocation Expenses

Lateral Hires:

- Organization announcement to be released as per the standard format set by Corporate HR.
- General Manager & above announcement to be released through Corporate HR at Group Level.
- DGM & below organisation announcements to be released at unit level, a copy of the same to be forwarded to Corporate HR.

Joining & Induction

- Corporate Induction will be conducted once a month for the new joinees. Business HR's to carry out standard induction process in addition to Corporate Induction.
- Candidates should be onboarded on or before 21st of the month.

Relocation Expenses

Candidates relocating will be reimbursed economy flight tickets for self and immediate

family members, for shifting of white goods, two quotations should be obtained. The most economic and feasible option shall be approved. ~~whichever low will be reimbursed~~, Approval from the HR should be taken before proceeding.

4.3 Recruitment Types

4.3.1 Internal Job Posting

Purpose -

The purpose of an IJP is to encourage and provide equal opportunity to internal talent. This will enhance their career growth opportunities and in turn enable employee retention.

Guidelines for releasing IJP Announcement -

- For all levels and grades the IJP will be released via HRIS/email.
- The IJP will be active for 10 days from date of release for internal candidates to apply.

All open positions to be floated within organisation prior to sourcing candidates externally. Interested candidates should apply by marking their unit HR & Business Head/ Terminal Head in copy through standard application template.

Eligibility -

- Full time employees (only on company payrolls)
- Should have spent minimum 2 yrs. in the current role (Exceptional cases of role redundancy or clubbing of roles can be considered for an IJP)
- Movement through an IJP will be at the same compensation, salary revision to be done in the following annual appraisal cycle
- The Inland travel & transfer policy will apply in case of change of location. The policies & practices of new location will be applicable.

4.3.2 Employee referral policy

Objective:

Employees are invited to refer suitable candidates for employment opportunities with the Group. The Group objective of this program is to utilize the groups network to hire good quality candidates.

Guidelines:

- Any employee on the rolls of the organisation can refer professionals for recruitment.
- Candidates referred should have the requisite qualifications and experience wherever specified in the 'Job Posts' advertised/posted on Darwin HRMS for this purpose from time to time.

- All employees in HR department, employees in General Manager grade and above, line managers for the particular vacancy, employees responsible for recruitment and non-employees who are working on assignment with JM Baxi on any kind of contract, consulting, or temporary basis shall not be eligible for the Employee Referral Payout.
- Candidates who have already responded to a requirement against an advertisement or through a recruitment consultant will not be considered as a referral.

Incentives:

The incentive for every candidate selected through this policy shall be as follows:

Employees will be eligible for a “Referral Bonus” for every selected referred candidate as mentioned below, subject to adherence of the criterion mentioned below:

Designation	Payment	Referral reward (Rs.)
M13-M19	Employee Referral amount shall be paid once the referred candidate completes 90 days within the system. Both the referring employee and the referred employee must be in the employment of the company at the time of disbursement of reward amount.	Rs. 15,000/-
M8-M12		Rs. 30,000/-
M1 – M7		Rs. 50,000/-

Process:

Open positions shall be posted on

- HRMS
 - IJP << Refer to clause ‘Internal Job posting’>>
 - Notice Boards
1. Employees referring candidates must complete the Employee Referral Form (**Annexure-A**) and forward it to respective HR along with candidate’s resume.
 2. HR Reviews the resumes to match the candidature to the existing position and reviews the Employee Referral Form to verify the eligibility of the employee for a referral bonus.
 3. HR will contact the candidate and arrange for interviews as appropriate.
 4. Employee referring the candidate will not be in anyway involved in the selection/ recruitment process.
 5. Selection will happen on merit only and the referral process would be considered as one of the multiple sourcing options being used by HR Team to source talent for vacancies created within the organization.
 6. HR team to update the status of the referee to the referrer once the final offer is released.
 7. There is no limit on the number of referrals the employee can provide.
 8. In case the same candidate is referred by more than 1 employee, the 1st referrer will be considered for referral amount.

Criteria:

1. Employee Referral Reward Amount is subject to individual income tax deduction as applicable as per Income Taxation Act.
2. Both the referring employee and the referred employee must be in the employment of the company at the time of disbursement of reward amount and neither should be serving their notice at the time.
3. If the resume of the candidate is received from multiple sources, the credit shall be given to the first source as per HR Records

Exclusions to the policy

1. Instances that do not qualify for a referral award include referrals of the following:
 - Former employee of JMB being rehired (within 3 years of leaving)
 - Former non-employee/ consultant who is hired as an employee
 - Candidate who was presented from another source prior to the referral

Life span of referral

If a referred candidate is not hired within 1 year of the date of referral, the referral is considered closed. The referring employee will no longer be eligible to receive the referral award if the candidate is hired in the future.

Approval Required:

For Employee referral bonus payout, following approvals would be required prior to rolling out of the offer.

- ✓ HR
- ✓ Payment release approval by Business Head

4.3.3 Lateral Recruitment**Selection of Mode of Recruitment:**

While initiating the recruitment process for lateral recruitment, HR will typically hire/source candidates from via the modes mentioned below-

- Job Portals
- Internal resume database
- Career website
- Advertisements in National / Local print media
- LinkedIn/other professional social media platforms
- Placement agencies/consultancies
- Mandated searches
- Campus recruitment
- Internal Job Posting
- Employee Referral
- Walk in Drives

Criteria

- The candidate should possess the appropriate technical skills/work experience to

-
- perform the role
 - The candidate should be a culturally fit for the organisation
 - Previous performance records should be sound
 - Medically Fit & Good reference and background check report
 - Due importance to be given to stability factor
 - Candidate should fit into the CTC range defined for the role

4.4 Internships

Objective:

The Organisation is actively working towards becoming a preferred employer and premier recruiter. The Internship Policy will ensure the placement of the organisation as top of the mind recall in some premier business schools.

Interns are offered an opportunity to synthesize academic learning with practical applications whereby we gain a fresh perspective and outlook in our business thereby creating a win – win situation for our organisation and the Interns.

The interns are expected to maintain secrecy and confidentiality about any information related to the organisation, which they may come across during the course of their internship. The projects offered to them will enable learning and help them get a deeper understanding of the business and several management-related issues in our sector.

Guidelines

- Internships will be offered to students currently attending college for graduate or post graduate studies or are pursuing a professional certification (eg. Chartered Accountancy). A recommendation letter will be required from the college/ institute to be considered for the internship
- The projects offered would be for a duration of 1-3 months (the project offered to Industrial Trainees may range from 9-12 months)
- A certificate of Internship shall be awarded to the candidate on successful completion of the project
- Stipend shall not be paid to interns unless specified. If applicable, the stipend shall be inclusive of to and fro fares within the city and travel undertaken by the student from origin city to our office.
- Candidates brought on as interns as part of a summer internship program/industrial trainee program will be offered a stipend depending on their qualifications (Graduate/MBA/CA/Legal) which will be communicated to the institute prior to candidate evaluation

4.5 Campus Recruitment

Campus Hiring Programs - Campus recruitment is the process of recruiting young talent directly out of colleges/universities to help infuse the organisation with young talented employees year on year.

The Organisation is actively working towards becoming a preferred employer and premier recruiter. To achieve this, we will have 2 campus hiring programs – Management Trainee Program & Graduate Trainee Program.

The batch size for both programs will be decided annually basis the hiring requirements and vacancies within the organisation. The Management Trainee program will visit Tier 1 & 2 MBA campuses while the graduate trainee program will focus on Engineering institutes.

Process

Campus Identification

- List of Institutes will be identified at Corporate Level basis their repute and rankings.
- CTC bracket for the Management Trainee programs will be up to 10 LPA while for the Graduate Trainee program will be up to 6 LPA (This will be only applicable to students hired as part of this program).

Campus Connect

- Pre-placement talks & Summer Internship programs will be used to engage with campuses.

Criteria - On Campus & Off Campus

- First Class Throughout (No deviation)
- No gap years, other than for work experience between their graduate and post graduate degree
- Performance during the Personal Interviews and Group Discussions.
- Internship Project Performance & Recommendations
- Character Certificate from the institute
- Good Communication Skills
- Preferable well versed with Ms Office Excel, Word & PPT
- Medically Fit
- Candidates should be under the age of 23 for the Graduate trainee program and 30 for the Management trainee program.

Selection Process Guidelines

- A panel including HR and Senior Business representatives (minimum 1 HR and 1 Business representative per panel)
- Consider bright talents who are rank holders
- Demographic mix: Regional mix, academic excellence, personal background
- High diversity percentage – Ensure equal gender ratio

- Candidate evaluations should be captured in writ for both the Group Discussion and Personal Interview rounds
- An assessment test may be incorporated if necessary
- Kind of assessments will have to be specified.

4.6 Re-Hiring former employees

To facilitate hiring of former employees who are competent performers:

Eligibility

- Performance Ratings – The minimum rating should be 3 & above in the last appraisal cycle.
- In case of unrated former employees, decision will be based on their past performance in the organization.

Critical Evaluation

- Reason for Separation – The candidate should not have been terminated from the organisation/absconded from the job.
- Exit interview feedback should be studied to understand motivation for leaving the organisation.
- Feedback should be taken from reporting manager, Business/Terminal Head, Unit HR Head of the business under which the employee served in his previous tenure.

Process

- In case of re-hire within 24 Months of leaving the company, re-hire will be at the same level and grade as per the last position held for similar work profile, for enhanced role Management to decide on the designation & compensation reviewing internal parity
- Applicant rehired beyond 24 Months of resignation can be rehired in lines with the internal and external parity through appropriate selection process.
- All other process guidelines on right panel selection, background check, reference check, medical etc would be in lines with lateral hiring guidelines.
- A former employee who has been rehired for a new position will be governed by the probation period applicable for the new hires (probation period, leaves etc).



Leave Travel Allowance

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Revised by	Corporate HR	
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Issued By:	Corporate HR Team	

5 Leave Travel Allowance

All employees of the organisation are eligible for LTA as per the eligibility mentioned in the Letter of Appointment or as changed by letter of increment / promotion (both in case of an existing employees and those joining midway) . LTA amount shall be paid on a monthly basis. After the employee submits proof of travel along with LTA claim and exemption form, tax exemption will be given in accordance with the Income Tax rules.

- The employees must be on approved Privilege Leave for a minimum of Five days. Applications for LTA can be made only after the person who had applied for leave has gone on leave and has resumed duty.
- The employee availing LTA should submit the application in the standard format (Form No. 9) duly filled in along with tickets/bills to HR Department in respective locations through their Departmental Heads.
- The LTA covers the employee, his/her spouse, dependent unmarried children, and dependent parents.
- In case an employee is unable to produce the tickets/bills, the entire amount will be taxed as per prevailing Income Tax Act.
- LTA should be claimed within the financial year.
- All tax liabilities arising out of this benefit will be borne by the employee.

5.2 Eligible Limits

- Refer your compensation structure.
- Per annum quantum of your LTA can be claimed for exemption for the ongoing financial year.

5.3 Tax Exemption and Liability on LTA Payment

Under Section 10(5) of Income Tax act, LTA received by an employee for self or family in connection with proceeding on leave **to any place in India** is exempt from tax subject to the following conditions:

- 5.3.1 Exemption will be limited to the amount of expenses actually incurred by the employee for the purpose of such travel. Thus the employee will be required to keep an account of the actual expenditure incurred per person in the family and furnish evidence of such expenditure while availing of LTA under section 10(5). If

the employee has not incurred any expenditure, exemption under Section 10(5) of the Income Tax Act, will not be allowed respect of LTA received from the company.

5.3.2 Conditions for the purpose of Section 10(5):

A. The amount exempted under clause (5) of Section 10 of income Tax Act in respect of the value of LTA received by the employee in connection with proceeding:

On leave to any place in India

The amount actually incurred on the performance of such travel subject to the following conditions:

- where the journey is performed by air, an amount not exceeding the air economy class fare of the National carrier, by the shortest route to the place of destination.
- where places of origin of journey and destination are connected by rail, an amount not exceeding the air-conditioned first-class fare by the shortest route to the place of destination and
- where the places of origin of journey and destination or part thereof are not connected by rail and the journey is performed between such places, the amount eligible for exemption shall be –
 - where a recognised public transport system exists, an amount not exceeding the first class or deluxe class fare, as the case may be, on such transport by the shortest route to the place of destination.
 - where no recognised public transport system exists, an amount equivalent to the air-conditioned first-class rail fare, for the distance of the journey by the shortest route, as if the journey had been performed by rail.

B) The exemption referred to in sub rule (1) shall be available to an individual in respect of two journeys performed in a block of four calendar years. HR Department will inform all locations on this at the beginning of the financial year, i.e. in which financial year an exemption is available.

5.4 General

- The application for Privilege Leave should be in the standard format & approved by the Sanctioning Authority.
- In case an employee is unable to produce documentary evidence for the year in which an exemption is available, the LTA amount is liable to be taxed.



Training Policy

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Revised by	Corporate HR	
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6 TRAINING POLICY

Objectives:

- To upgrade the existing knowledge and skills of employees
- To expose employees to the latest techniques and systems in their area of work
- To inculcate a sense of appreciation for other functional areas and an understanding of inter-functional linkages
- To bring in attitudinal changes in the employees

6.1 Areas of Training:

- Skills: The employees are given exposure to sharpen / develop the necessary skills in their area or other relevant functional areas.
- Knowledge: Knowledge enhancement programs are planned for the employees to enhance their knowledge about relevant areas of work.
- Attitude: Attitudinal requirements of the Organization from its employees will be assessed through organizational climate study and employee feedback during various forums. The necessary training in attitudinal change will be provided to employees.

6.2 Training Facilitation:

- HR head shall go through and review the training need identified through competency review and performance appraisal of employees and may tabulate the same. Based on the training needs, Training Calendar to be prepared by Head HR. A copy of the same to be sent to Corporate HR.
- Head HR with the assistance of Corporate HR will assess the training faculties (internal/external).
- Business vertical Head approves the training budget.

6.3 Training Methods

Training will be imparted to the employees 'On-the-Job' or in a structured 'Classroom Environment'.

It will be conducted by:

- Internal faculty: The training requirements can be met by designing and conducting courses in-house.
- External faculties / Agency: The training needs can be fulfilled by deputing employees to programmes conducted by external agencies.

The decision shall be based on:

- The number of employees to be trained in a particular area
- Availability of Internal faculty/ experts
- Training Budget/ Financial resources

6.4 Training Need Identification (TNI):

Training needs will be identified based on the following:

- Recommendations from the assessing authorities in the Performance Appraisal Report, Training need as identified and stated by the employee
- Competency mapping and job description prepared for each function / Level
- Periodic surveys

6.5 Guidelines on Imparting Training:

The guidelines for both internal and external trainings are outlined as:

In-house (On the Job) and External training:

- In case of external training nominations, training calendars are obtained from various sources viz: Chamber of Commerce, Port authorities, Management Consultants, Management Institutes etc, who are conducting or organizing regular training programmes on various topics.
- For nominating personnel for external training, the Location Head / Branch Head / Branch Head should obtain concurrence of Head HR before every such nomination.

A brief description about the form:

- Preliminary details like name, designation, training need identified are to be filled first.
- The date of programme is also to be informed to the trainee for which space is provided.
- In case of ' External Training' a brief of the programme is to be obtained from the Institutes /Consultants who conduct such training. The course objectives so obtained have to be conveyed to trainee for which space is provided under the heading 'Course Objective'.
In case of ' In-house training ' the course objectives are prepared by HOD after interaction with concerned employee.
- Objectives for Training being imparted:
These are specific and measurable on the job objectives which have to be decided mutually by the HOD and trainee beforehand.

After completion of training form, impart training as per need whether through in-house programme or by nominating employee for external training programme.

6.6 Evaluation Review Plan

Evaluation Review date:

Once objectives are set, evaluation of training effectiveness is to be done after the programme. A date for this evaluation session has to be fixed beforehand.

A form named ' Evaluation review plan' is designed (Form no: 16) to measure the effectiveness after the training programme. This evaluation is to be done against the objectives as set in the 'Training Form' and hence the objectives should be discussed in detail before finalizing and listing.

Methods of Evaluation:

In-House & External Programme:

- Observation
- Interviews / questionnaires with Employees, Immediate Supervisor / Department heads.
- Discussions
- Informal feedback
- Formal presentation by the employees. Actual testing (for assessing the capability)
- Critical incidents

The form is to be filled in during the review session. The HOD makes the remarks of adequacy/inadequacy against each set objective. The remarks are to be substantiated with evidence whose description is to be filled in the status column. Any specific remarks regarding the performance of the employee/ trainee against the objectives are to be made in the space provided after table.

If an employee / trainee is found to be lacking in performance against the set objectives the next review date could be fixed, or the action plan could be altered. For the next review also, a format could be used.

All in all, a specific conclusion of the efforts on training and objective evidence for the same are to be arrived at the end of the review sessions.

It goes without saying that to derive favorable results from the above exercise all the HODs must extend their cooperation and guidance to an employee / trainee in the implementation of learning.

6.7 Training Feedback Form (For External Training Programs):

In order to assess the training program and benefit derived from the external training program, the concerned employee / trainee should complete the training Feedback Form (**Form no: 15**) on completion of the program. Copies of the form should be forwarded to HOD / Branch Head and Head – HR. One copy of the form may be retained by the employee/ trainee. The Head HR will forward summary of training feedback to Corporate HR.



Entitlements

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8. Entitlements

8.1. Group Personal Accident Policy

All employees of J. M. Baxi Group companies are covered under Group Personal Accident policy which taken from authorized Insurance Companies.

- The Insurance Company will pay to the insured person for any bodily injury resulting solely and directly from accident caused by external, violent and visible means, death, permanent total disablement from injuries, permanent partial disablement, and temporary total disablement.
- Upon the happening of any event which may give rise to a claim under this policy, the Location Head/ Branch Head should inform Head HR immediately. The company will send a letter to Insurance company with all particulars. The Claim Form will then be forwarded by Insurance Company.
- Proof satisfactory to the company shall be furnished of all matters upon which a claim is based. The Insurance Company may depute their medical or other agent of their company to examine the person of any alleged injury or disablement. In the event of death, a postmortem examination of the person should be carried out and report then be forwarded to Insurance Company within 14 days through Head HR.

8.2. Group Health Insurance

8.2.1. Scope of Cover:

The Employees of J. M. Baxi & Group companies and their and family members are covered by Group Health Insurance over the years.

- Family to include Employee, spouse, first two of their dependent children, dependent Father/Mother or dependent Father-in-law/Mother-in-law. Please note that combination of parents with In-laws is not allowed.
- Age limit:
 - For employees upto 70 years
 - For Dependent Children upto 25 years
 - For family members upto 70 years
- Coverage: Basic mediclaim, pre-existing diseases covered {as per Clause 3 exclusions [i], [ii] & [iii] are deleted and hence stands covered under our policy (as per policy wording/IRDA Guidelines)}. Pre-& post hospitalization 30 and 60 days respectively.

8.2.2. Sum Insured per Employee on floater basis:

Category I -- Rs. 3 lakhs (Management Cadre)

Category II -- Rs. 2 lakhs (Non-Management Cadre)

- **Maternity Benefit & Eligibility:**
Female Employees & Spouse of Male employees are covered for Maternity benefits for first two children.
 - Normal Delivery upto Rs. 30,000/- *
 - Caesarean upto Rs. 50,000/- *

* The above is inclusive of expenses from pregnancy detection to delivery.

- **Cataract**
Upto Rs. 50,000/- maximum per eye.

8.2.3. Cashless Hospitalisation:

E-Cards will be provided by TPA for all Employees/family members covered under the scheme.

For Employees and their family members added during the policy period, E-Cards will be issued within 10 days from date of submitting details/photo of the person to the Insurers.

8.2.4. Network Hospitals:

Will be provided in soft copy and also made available on the website.

8.2.5. Ayurvedic/Unani/Homeopathic:

To be covered if given in hospital by registered Ayurvedic Practitioner. Expenses incurred for Ayurvedic/ Unani/ Homeopathic treatments are admissible upto 25% of the Sum Insured.

8.2.6. Category-wise Entitlement:

<u>Category I</u> Management cadre	For self, spouse, two dependent children and dependent parents. Age Limit = Employee upto the age of 70 years Spouse and dependent parents upto 70 years Children between the age of 0 Months and 25 years. Floater Sum Insured = Upto Rs. 3 lacs for all of them together
<u>Category II</u> Non- Management cadre	For self, spouse and two dependent children and dependent parents. Age Limit = Employee upto the age of 70 years Spouse and dependent parents upto 70 years Children between the age of 0 Months and 25 years. Floater Sum Insured= Upto Rs. 2 lacs for all of them together

In the event of absence of any of the network approved hospitals, the said employees/family members can get admitted in any other hospital and submit claims for reimbursement to the Insurance Company (Insurer) through their respective HR Department.

Employees of Categories I & II can avail of Cashless Hospitalization in the network hospitals for themselves and their family members.

8.2.7. Room Charges Category:

Category	Room Rent	Room Rent for Vice President and above (at the discretion of J.M.Baxi Management)
Normal Room	1% of Sum Insured	1.5 % of Sum Insured
ICU/CCU	2% of Sum Insured	3% of Sum Insured

If any Employee desires to avail of a higher room facility than his entitlement, the Medclaim will be settled to the extent otherwise payable in his/her category. In case of cashless hospitalization, the insured will pay the differential to the hospital authorities before discharge from the hospital.

8.2.8. Declaration of Dependent Parent(s) / In-law(s):

Company's Name:

Location:

Department:

Employee's Name: Mr./Miss/Mrs.

Designation / Code:

Details of Dependent Parents upto an age of 70 years.

No.	Name.	Sex	Date of Birth	Age
1.				
2.				

I hereby declare that the above, is clearly understood by me and is the factual representation.

Signature of Employee

Name/Code No

- The criteria for declaration of dependent parent(s)/in-law(s) under the Group Health Insurance Policy is as follows:
- The Parents(s)/in -law(s) should be below 69 years of age at initial participation under the policy.
 - Should not exceed age 70 while covered under the policy.
 - Should be staying with the employee or staying separately; and should be in all respects solely financially dependent on the employee.
 - In case of female employee re: Coverage of in-laws: Father-in-law and/or Mother-in-law meeting the above criteria (as stated in the above mentioned points)

-
- If In-laws are covered under Medclaim facility of the company in which the employee's spouse is working, then they are not eligible for cover under this policy.

8.2.9. Timely Intimation of Hospitalization by Employees:

Upon hospitalization of an employee or his/her family member covered under this scheme, HR Department, should be immediately notified within 24 hours of hospitalization and in any case prior discharge from the hospital by fax/email/phone so as to enable HR Dept. to intimate the Insurance Company in order to ensure claim is registered /honoured suitably. In this connection your attention is drawn to the relevant clause of Medclaim Policy – Intimation of Hospitalization under Reimbursement Basis.

Employees to ensure that hospitalization under reimbursement basis is intimated to HR Department/Insurer/TPA on their respective e-mail id's and as soon as possible, on hospitalization and prior to discharge from the hospital.

Reporting Format

Patient/Claimant Name:

MAID No:

Date/Place of Hospitalization:

Name of the Hospital:

Phone number of the Claimant: Mobile: Res:

Disclaimer:

If the intimation is not given within 48 hours or before discharge from the hospital, then the said claim will not be entertained.

8.2.10. How to Claim Health Insurance:

Making a claim on your Health Insurance is easy, if you have the paperwork in place. Here's how to go about it.

➤ Reimbursement Claims:

- Intimate the TPA or insurer before hospitalization through HR Department. In case of an emergency, inform within 24 hours of admission.
- Retain all prescription, bills and payment receipts of medicines & ancillary expenses.
- Make sure the bills & receipts have the correct name & dates.
- Take the discharge card while leaving the hospital.
- Keep photocopies of all prescriptions, bills & the discharge card.
- If treatment is to be continued at home, make sure this is prescribed by the doctor at the time of discharge.
- Fill the claims form & submit along with original bills, discharge card & other documents.
- While submitting the claim form physically, HR department shall take a stamped receipt, if sending by post, use courier, speed post or registered post.

➤ Pre & Post-Hospitalisation Claims:

- If no further treatment is required after hospitalization, the claim can be submitted along with the hospitalization claim.
- Insurance companies reimburse expenses incurred 30 days prior to and 60 days after the hospitalization.
- Domiciliary expenses include doctor's fee, tests, nursing & medicines for up to 60 days after discharge.
- Fill up the claim form & submit it, along with the original bills & receipts to the TPA or the Insurance Co.
- Retain photocopies of documents for your own reference.

➤ **Cashless Claims:**

	Emergency Hospitalization	Planned Hospitalization
1	Show the E-card issued by the TPA or insurer at the hospital at the time of admission.	If hospitalization is planned, intimate the TPA or insurer after fixing the schedule with the doctor. Do this 3-4 days before being hospitalized.
2	Inform the TPA or insurer within 24 hours of admission. You can call or send an email. Make sure you get a claim intimation number.	Note down your claim intimation number after you have informed the TPA or insurer about the hospitalization.
3	Fill the authorization form and submit it to the TPA or insurer. They will then send the authorization letter to the hospital.	Fill pre-authorization form with details of the treatment needed and estimated cost. This form is provided with the policy document. It can also be downloaded.
4	Some hospitals may ask for a 15-20 % deposit depending on the TPA. This is refunded after deducting expenses not covered by the policy.	After examining the details, the TPA or insurer will issue an authorization letter for cashless treatment.
5	At the time of discharge, get photocopies of prescription, discharge card, bills & other documents.	At the time of discharge, get photocopies of prescriptions, discharge card, bills and other documents. The hospital will give the originals to the TPA or insurer directly.

After discharge, pre- & post hospitalization claims have to be filed separately.

8.2.11. Documents Needed for Claim Submission:

- TPA Card
- The pre-authorization claim form provided by the TPA or insurer
- Claim form along with the patient's and the doctor's signatures
- Discharge card
- Letter from the doctor who recommended hospitalization

-
- All prescriptions for medicines and line of treatment
 - Medical bills
 - Hospital bills with invoice number, break-ups of treatment expenses and proof of payment
 - Medical reports, X-rays, blood test reports (signed by the doctor)
 - Hospital registration certificate

Documents to be submitted within 7 days of completion of treatment.

Indoor case papers should be duly certified by the hospital / treating doctor.

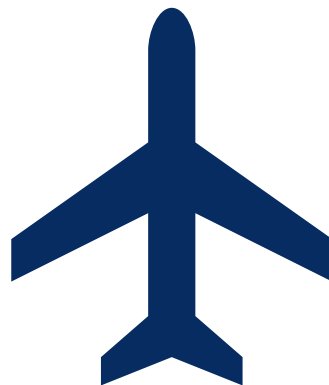
Stickers &/or invoice of the implants used in the treatments (eg: Lenses in cataract)

Smart Idea: get the documents scanned and store them in digital format for ease of access.

8.2.12. Tips to avoid Claim Rejection:

- Check whether the hospital is on the Insurance Cos. Network.
- In case you have more than one health cover, mention that in the claim form.
- All bills (medicines, diagnostics & surgeries) must be accompanied by prescriptions.
- In case of an emergency hospitalization, make sure the doctor specifically prescribes admission.
- Unless your policy covers daycare procedures, hospitalization is covered only if the patient is admitted for at least 24 hours.





Travel Policy

Policy History Details	Existing Policy	
Original Issue Date	Apr 2017	
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8. Travel Policy

8.1 Inland Travel Rules

8.1.1 Introduction:

- This policy is in supersession of all the existing policies/practices and is applicable to all management staff in the company for travel undertaken within the country.
- Ticketing: employees can book their air tickets by using their Credit/Debit Cards. In case of any difficulty in booking tickets through internet/website of Airlines, employees can use the services of the authorized Travel Agent of location.
- All tours must be undertaken with prior sanction in the approval form (Form no. 11) from the specified approving authority.
- All tours should be undertaken by the most economic eligible mode and class of travel and by the shortest route and keeping in view that the time spent in journey should least affect the working hours. Return or concessional ticket when cheaper than two single journey fares should be purchased wherever available.
- In case of availability of Company Guest House, the employee may avail the same facility.

8.1.2 Tour Expenses Report:

Tour Expenses Report should be submitted in the prescribed format (Form No. 12) within seven days of return from tour.

8.1.3 Mode of Inter City Travel, Boarding & Lodging, Intra City Conveyance:

The details in policy governing the mode of travel between cities for different categories of employees, eligibility of reimbursement of boarding and lodging expenses and local conveyance are available with Branch Head/Location Head/HR Representative at respective locations. Kindly familiarize yourself before undertaking the tour.

8.1.4 Authorization:

All travel requisition would have to be duly authorized by the Branch Head/ Location Head/ Business vertical Head. While approving, the Branch Head/Location Head/ Business vertical Head should consider the purpose for travel and employee's entitlements. Similarly, on return from travel, the expenses should be approved by the Branch Head/ Location Head/ Business vertical Head. Whenever an exception is required, such exception with justification/clarification by employee has to be approved by Branch Head/ Location Head/ Business vertical Head prior to the travel of the employee.

- Employees are advised to use their credit cards to settle the expenses incurred including hotel bills, during the tour, which will be reimbursed against bills as per limits stipulated in Annexure I.
- No advance should be taken from the company's Principals/customers/clients under any circumstances.

- Car hire expenses incurred on behalf of concerned employee will be settled by the Branch where the employee has visited. However, the same will be reimbursed by the employee's Branch upon receipt of debit note from the concerned location.
- Employees while on tour are expected to maintain the highest norms of conduct/behavior.
- If travel to a place exceeds 30 days, then this place shall be treated as temporary Headquarters.
- For employees requiring making frequent travels, a fixed travel allowance may be approved by the Departmental Head separately in consultation with the President.
- Reimbursement of expenses incurred on liquors/alcohol is prohibited unless substantiated as entertaining Principals, Clients, etc.

8.2 Foreign Travel Rules

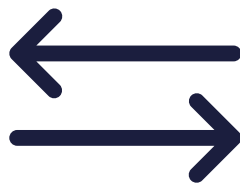
The foreign travel rules will be within the prevailing RBI guidelines. An overseas travel request (**Form No. 11**) on company work should be raised for all travel and approved by Business Vertical Head/Executive Directors and a copy to be sent to the Accounts Department for arrangement of foreign exchange and for arranging overseas insurance policy.

8.2.1 Daily Foreign Exchange Allowance:

The daily rate includes boarding, lodging, laundry, conveyance, portage, and other incidental expenses. The details of Daily Allowance rates are available with Branch Head/Location Head/HR Representative at respective locations. If it is a third party sponsored foreign tour, the exchange allowance to be allowed will be decided by Business Vertical Head/ Executive Directors according to the country of visit on a case-to-case basis.

8.2.2 Class of Travel:

- The class of travel will be decided by the Business Vertical Head/Executive Directors if it falls outside the scope of prevailing rules.
- Company will reimburse airport tax (if any), in India and foreign airports plus expenses which are related to obtaining travel documents/inoculations/visas etc.
- Any expenses on foreign entertainment should have prior approval of CEO / COO / Directors.
- On return an employee must submit Foreign Exchange Utilization Report (Form No. 13).
- Till the submission of travel report and refund of foreign exchange, if any, the Accounts Department will hold the total amount paid to the individual as 'IOU' against the individuals' name.



Transfer Policy

Policy History Details	Existing Policy	
Original Issue Date	Apr 2017	
Revision Date	Jan 2024	Revision No: 01
Revised by	Corporate HR	
Issue Date	February 2024	
Effective Date	February 2024	
Issued By:	Corporate HR Team	

9. TRANSFERS

- Services of all the employees are liable to be transferred to any Department/Division of the Company/Associated Companies or assigned anywhere in India/ Overseas at the discretion of the Management.
- This policy applies to all the full-time employees of J M Baxi organisation who will be transferred to new location on the account of hiring/Internal Job Posting/new role.
- Employees transferred to a new location will be subject to the practices, working hours, holidays of that location/unit.
- In case of intercompany transfer, the relieving company within the group to follow complete exit process for the employee transferring to another entity within group and receiving company to follow complete onboarding process. The relieving entity will initiate transfer of statutory benefits such as PF, Leaves & Gratuity to receiving entity.
- For intracompany transfers a transfer letter will be issued, while in the case of intercompany transfer new appointment letter will be issued. This policy will be applicable to both intra and intercompany transfers.
- In case an employee leaves the organisation after transfer, the company will use group service certificate format to capture his/her entire tenure with the group. Units shall not give experience certificates to employees for intra company transfer.
- Receiving company to bare cost of employee for the 7 days of relocation. This will be from day of leaving previous entity.

TRAVEL REIMBURSEMENT

- 9.1. The transferred employee and his/her family will be entitled to the following travel reimbursements for moving to the new location, against submission of ticket counterfoils. (Refer **Annexure 1** for entitlement).

ANNEXURE 1							
Sr. No.	Grade	Locational Allowance*			Brokerage	Freight Charges	Mode of Travel
		Tier 1	Tier 2	Tier 3			
1	VP & above	55,000	40,000	30,000	At Actuals maximum up to 1 months' rent	At Actuals	Air, for Self & family
2	GM to AVP	45,000	30,000	25,000	At Actuals maximum up to 1 months' rent	At Actuals	Air, for Self & family
3	Mgr. to Dy. GM	35,000	25,000	20,000	At Actuals maximum up to 1 months' rent	At Actuals	Air, for Self & family
4	Dy. Mgr & below	25,000	20,000	15,000	At Actuals maximum up to 1 months' rent	At Actuals	Air / 2 tier AC ticket for self and family

***Locational Allowance:** This allowance will be applicable to employees who are being transferred to a location other than their current place of work/hometown. The amounts defined above will remain static and will be taxable in the hands of the employee. This component will not be considered as part of the CTC at the time of Annual increments.

Tier 1	Ahmedabad, Bengaluru, Chennai, Delhi, Hyderabad, Kolkata, Mumbai, Pune
Tier 2	Agra, Ajmer, Aligarh, Allahabad, Amravati, Amritsar, Asansol, Aurangabad, Bareilly Belgaum, Bhavnagar, Bhiwandi, Bhopal, Bhubaneshwar, Bikaner, Bokaro, Chandigarh, Coimbatore, Cuttack, Dehradun, Dhandbad, Durgapur, Durg-Bhilai Nagar, Erode, Firozabad, Goa, Gorakhpur, Greater Visakhapatnam, Gulbarga, Guntur, Guwahati, Gwalior, Hubli-Dharwad, Indore, Jabalpur, Jaipur, Jalandhar, Jammu, Jamnagar, Jamshedpur, Jhansi, Jodhpur, Kannur, Kochi, Kolhapur, Kollam, Kota, Kozhikode, Ludhiana, Madurai, Malappuram, Malegaon, Mangalore, Meerut, Moradabad, Mysore, Nanded, Nasik, Nellore, Panchkula, Patna, Port Blair. Puducherry, Raipur, Raurkela, Rajkot, Ranchi, Saharanpur, Salem, Sangli, Shillong, Siliguri, Solapur, Srinagar, Surat, Thiruvananthapuram, Thrissur, Tiruchirappali, Tiruppur, Ujjain, Vadodara, Varanasi, Vasai-Virar City, Vijayawada, Warangal. Itanagar, Dispur, Panaji, Gandhinagar, Shimla, Trivandrum, Imphal, Aizawl, Kohima, Gangtok, Hyderabad, Agartala, Lucknow, Dehradun, Kanpur, Nagpur, Nashik, Paradip, Vasai-Virar, Vellore, Ballari, Kakinada,
Tier 3	Other not included in Tier 1 & Tier 2

9.2. FAMILY

Spouse, Dependent Children and Dependent Parents staying permanently with the employee.

9.3. ENTITLEMENT (REIMBURSEMENT OF A MAXIMUM UP TO)

9.3.1. Local Conveyance

- Transportation from home to airport/railway station and from airport/railway station to home/hotel for the purpose of the journey will be reimbursed on actual.
- During the journey, the employee and his/her family will be entitled to a per day flat rate of Rs. 300/- per adult, to take care of expenses towards food and other miscellaneous expenses like tips, portage etc. For children below 12 years, the flat rate applicable will be Rs. 200/- per day per child.

9.3.2. Transporting Household Articles

- Towards loading, freight, packing, unloading, unpacking and other direct charges.
- Cost of transfer of personal and household effects, packing/crating charges will be reimbursed at actuals.
- A minimum of 2 quotations need to be submitted to the HOD/HR, the most economical/feasible option will be approved.
- Reimbursement of Transit Insurance will be provided on actuals.

9.3.3. Halting Allowance Expense

- An employee who is required to surrender his residence at the old location will be permitted to avail halting expenses for stay in a hotel at the old location provided the number of day of stay at old and new locations together does not exceed the limit of 7 (seven) days laid down in the policy. The entitlement for lodging, meals and miscellaneous expenses for the employee and his family during this period will be as per Inland Travel rules as applicable to the employee.
- For extra lodging expenses of family members, the limits wherever applicable will be enhanced by Rs.300/- per family member/ day. In case of children below the age of 12, the employee will not be eligible to take an extra room for lodging.
- The employee must submit bills for the actual expenses on lodging, food and other miscellaneous items, in order to claim the above reimbursement.
- No expenses will be reimbursed beyond the maximum allowable stay of 7 days.
- If accommodation is available in the Company guest houses/ transit houses in the new location, lodging will not be permitted in a hotel. However, for food and miscellaneous expenses, amounts will be as per the limits specified in the travel policy and will be paid against supporting's, if no such facilities for food are provided from Company's Canteen/Guest House. Halting allowance is paid only to take care of major essential expenses of the employee, expenses on liquor will not be entertained for reimbursement.
- Head of HR & Admin will issue a transfer order in all transfers.
- In all transfers, it is the endeavour of the Company that the employees do not stand

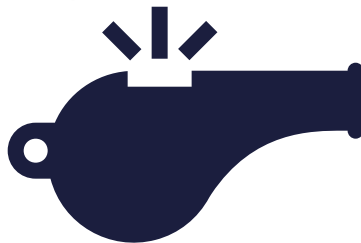
to lose his/her gross emoluments.

- The Management has the right to disallow any reimbursements that it may consider unreasonable. The Management has the right to amend /alter the Transfer Policy at any given time.

9.4. EMPLOYEE INITIATED TRANSFER

- Any transfer request raised by an employee should be shared with the immediate supervisor and the entity HR.
- Transfer request raised by the employee will be fulfilled in case the relevant position is vacant and available in the requested location.
- The employee may be put through an interview by the new location business / branch head to ensure minimal disruption to business operations.
- Employees transferred to a new location will have to adhere to the practices, working hours, holidays of that location/unit.
- In case of intercompany transfer, the relieving company within the group to follow complete exit process for the employee transferring to another entity within group and receiving company to follow complete onboarding process. The relieving entity will initiate transfer of statutory benefits such as PF, Leaves & Gratuity to receiving entity.
- Joining time: In addition to the actual time spent in the joining, 7 days at the reporting station is allowed.
- The employee is not eligible to avail the travel reimbursement or any allowance from the organisation as it is a self-initiated transfer.
- The employee is responsible to bear all the expenses on his/ her own.

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Whistleblower Policy

Policy History Details	Existing Policy	
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Issued By:	Corporate HR Team	

10. Whistleblower Policy

10.1. Objective

To provide employees an avenue to raise concerns, in line with J. M. Baxi Group's commitment to the highest possible standards of ethical, moral and legal business conduct and its commitment to open communication.

To provide necessary safeguards for protection to employees from reprisals or victimization, for whistle blowing in good faith.

10.2. Definition

The definitions of some of the key terms used in this Policy are given below:

- **"Appropriate Authority"** shall mean Corporate HR Head/Directors.
- **"Employee"** means any employee of "J. M. Baxi Group".
- **"Whistle Blower"** means an Employee raising a serious concern under this Policy.
- **"Serious Concern"** means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- **"Employee Manual"** means "J. M. Baxi Group HR Policy Manual."

10.3. Scope

This policy is an extension of the J. M. Baxi Group HR manual. The role of a Whistle Blower is to bring to the notice of the appropriate authority any serious concern noticed or observed. A whistle Blower is not required or expected to act as investigator or finder of facts. A whistle Blower is also not required or expected to determine or suggest the appropriate corrective or remedial action that may be warranted in a given case.

10.4. Eligibility

All permanent employees of J. M. Baxi Group are eligible to raise serious concerns under the Policy. The serious concern raised should be in relation to matters concerning J. M. Baxi Group of companies.

10.5. Types of Serious Concerns

The whistle blower policy is intended to cover serious concerns that could have a large impact on J. M. Baxi Group companies from actions (actual or suspected) that:

- May lead to incorrect financial reporting,
- Leakage of confidential information,
- Are not in line with applicable J. M. Baxi Group Policy,
- Are unlawful,

-
- Are fraudulent, relates to financial irregularity or forgery of documents,
 - Pertains to corruption, theft, bribery, or blackmail,
 - Other criminal offences,
 - Miscarriage of justice,
 - Endangering the health or safety of any individual,
 - Endangering the environment,
 - Concealing any of the above,
 - Otherwise amount to serious improper conduct or
 - Any other event which would affect the interest of J. M. Baxi Group

10.6. Complaints through Mails

An employee may raise concern to any one of the Committee members by submission in writing, by email (corporatehr@jmbaxi.com) or by meeting the committee member in person with prior appointments.

Anonymity is not encouraged, as the corrective actions are easier to take if the person raising a concern is known.

10.7. Whistleblowing Committee

An investigation committee has been set up to handle all complaints promptly and in an extremely confidential manner.

The committee consists of:

- 1) CHRO
- 2) Directors





Grievance Policy

Policy History Details	Existing Policy	
Original Issue Date	Apr 2017	
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11. Grievance Policy

Grievance shall include the grievances of personal/individual nature i.e. should be concerning one individual employee only which may be relating to job satisfaction, work environment, harassment etc. affecting one individual personally without any comparison with others and the solution thereof must not affect any other except the individual aggrieved.

11.1. Stage 1

The initial approach to settling any issue is open communication. An employee should first seek to resolve any complaint with his/her immediate supervisor through informal discussion. If such discussion does not resolve the matter informally, and the employee believes that his/her complaint rises to the level of a grievance, then the employee may initiate a formal grievance as described in stage 2 in an effort to seek an equitable solution.

11.2. Stage 2

- An aggrieved employee shall present his/her grievance in writing into the respective Location/Branch/Business Head as the case may be. Respective Location/Branch/Business Head along with Head HR will try to resolve the grievance. In case it is not resolved, he/she shall forward the same with their comments on the grievance form within 3 days to the Grievance committee designated by the management by this purpose.

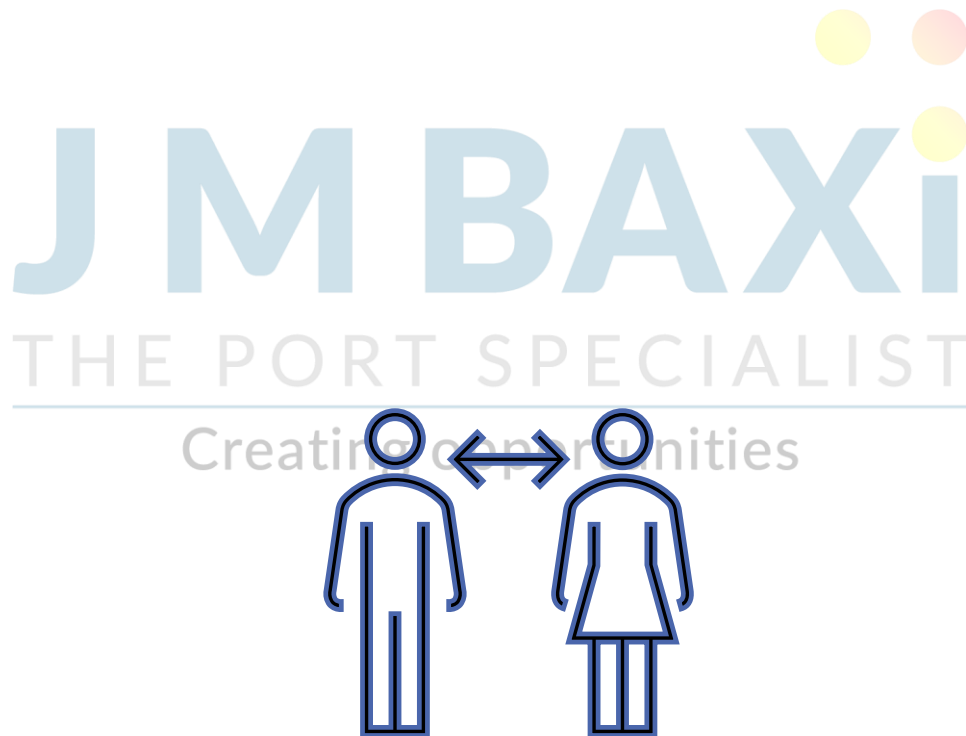
The Grievance Committee consists of:

- 1) Business Vertical Head
- 2) Business Vertical HR

- The grievance committee shall give answer within 10 days of the presentation of grievance. If the action cannot be taken within that period, the reason for delay should be recorded.
- If the employee is not satisfied with decision of grievance committee or fails to receive an answer within the stipulated period he shall forward his grievance to the Director through Corporate HR Head.
- Corporate HR Head shall submit the grievance form immediately to the director's office for further procedure.

-
- The Director will review the decision/recommendation of grievance committee and give his final decision for redress the grievance raised by an employee. The final decision of the Director shall be communicated to the employee concerned by the Head HR within 7 days of the grievance committee's recommendations.
 - If the grievance arises out of an order given by the Management, the said order shall be first complied with before the employee invokes the procedure laid down for redressal of grievance. If, however, there is a time lag between the issue of order and its compliance, the grievance procedure may immediately be invoked but the order must be complied with within the due dates/time, even if all the steps in the grievance procedure have not been exhausted. It may, however, be advisable for the management to wait for the findings of the grievance procedure mechanism.
 - The grievance committee shall have the right to access to any document connected with the enquiry maintained in the department and which may be necessary to understand the merit or otherwise of the employee grievances. The management's representatives shall have the right, however, to refuse to show any document or give any information, which they consider being of a confidential nature.
 - In calculating the various time intervals under the above clause, holidays shall not be reckoned.
 - The language of the grievance handling will be the language well understood to the employee.
 - The grievance committee will include employees/consultant/HR Head (But not the person against whom the grievance is raised), as may be decided by management.

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Policy on Prevention of Sexual Harassment

Policy History Details	Existing Policy	
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12. Policy on Prevention of Sexual Harassment

12.1. Background

J M Baxi Group (the "Group") - Established in 1916, J M Baxi Group is India's premier shipping services group, standing firmly on the pillars of innovation, commitment and performance. The Group enjoys strong brand recall worldwide and is synonymous with the shipping industry in India. It delivers award winning performance in all its business activities and is backed by over 2500 experienced and committed professionals with a nationwide network of company-owned offices spanning across various locations in India.

All the companies of J M Baxi Group shall hereinafter be individually referred to as the "Company".

The Company as part of the J M Baxi Group is committed to provide equal opportunity at workplace and a safe and conducive work environment regardless of 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, the Group has formulated the Policy on Prevention of Sexual Harassment at Workplaces which are applicable to all the Companies mentioned above and also constituted Inter006Eal Complaints Committee's for each of the Company. The Internal Committee of each Company shall be applicable to the branch office and office sites of each Company respectively.

Sexual harassment results in violation of the fundamental rights of a woman to equality under articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade or business with includes a right to a safe environment free from sexual harassment. In view of changes to the Act and Rules thereunder it is thought fit to rewrite the policy and also reconstitute the Internal Committee's and therefore, this revised this Policy has been framed, in line with the provisions of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013", (hereinafter referred to as the "Act") and the rules framed thereunder namely the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the "Rules").

12.2. Purpose of the policy

The purpose 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.

This policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, consultants and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

12.3. Definitions

- "Aggrieved Woman" 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.
- "Complainant" is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, 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.
- "Employee" as defined under the Act and means a person employed with the Company or other Group companies 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.
- "Employer" means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and will include 'Chairman', 'Director', 'Corporate HR Head' and 'Chief Executive Officer (COO)'.
- "Internal Committee" means and include an Internal Complaints Committee (hereinafter referred to as the
- "Member" means a member of the IC.
- "Presiding officer" means the presiding officer of the IC and shall be a woman employed at a senior level at the workplace amongst the employees.
- "Respondent" means a person against whom a complaint of alleging sexual harassment has been made under this policy.
- "Parties" means collectively the complainant and the respondent.
- "Sexual Harassment" includes any one or more of the following unwelcome acts of behaviour (whether directly or by implication):

12.3.1. Any unwelcome sexually determined behaviour or pattern of conduct that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:

- Physical contact and advances;
- Demand or request for sexual favours;
- making sexually coloured remarks or remarks of sexual nature about a person's clothing or body;
- showing pornography;
- Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including but not limited to catcall, wolf/finger whistle, vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures, etc.

Sexual harassment can involve a series of incidents, or it can be a one-off occurrence.

12.3.2. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment; or
 - Implied or explicit threat of detrimental treatment in employment; or
 - Implied or explicit threat about the present or future employment status; or
 - Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
 - Humiliating treatment affecting any person's health or safety.
- "Workplace" means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

12.4. Procedures and Guidelines

Each Company shall follow below procedures and guidelines while dealing with the complaints under the Act.

12.5. Composition of Internal Committee

Pursuant to the relevant provisions of the Act, an Internal Committee (IC) has been constituted to prevent sexual harassment and to receive and effectively deal with complaints pertaining to the same. The composition and contact details of Internal Committee for each of the Company shall be emailed to all employees and the same would be available with the Company HR.

An employer will not form a part of the IC. A quorum of 3 members is required to be present for the proceedings to take place. The quorum must include the Presiding Officer, at least one member and the external member. The IC may in its call such other persons as Invitees for the meetings of the Committee.

12.6. Complaint of Sexual Harassment

12.6.1. Raising of Complaint

- Any aggrieved woman may make in writing, a complaint of sexual harassment to any member of the IC 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.
- However, the IC 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 (a) 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.

- Where the aggrieved woman is unable to make the complaint on account of her physical or mental incapacity or death or otherwise, [her representative, as more fully described under Rule 6 of the said Rules, may make a complaint.
- The Human Resource Department will officially forward the complaint to the Presiding Officer of IC within seven (7) days from the date of receiving the complaint incase the complaint is not directly addressed to the Presiding Officer of the Company.
- The complainant shall submit 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.

12.7. Redressal Process

12.7.1. Conciliation

Before the IC initiates an inquiry, the committee at the request of the aggrieved woman may take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the IC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the IC.

12.7.2. Inquiry

- In case where a settlement is not feasible or could not be arrived at through conciliation (ref clause 14.7.1 above), the IC will conduct an inquiry into the complaint. Additionally, an inquiry may also be initiated if the aggrieved person informs the IC that any terms of settlement (ref clause 14.7.1 above) has not been complied with by the respondent.
- The IC within 7 (seven) working days of receiving the complaint shall forward one copy thereof to the respondent for obtaining a response.
- The respondent within 10 (ten) days of receiving the complaint shall file a reply to the complaint along with list of supporting documents, names and addresses of witnesses.
- The IC shall consider the reply from the respondent and initiate an inquiry. The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC. IC shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- In the event of failure to attend personal hearing before IC by the complainant or the respondent on three consecutive dates (intimated in advance) without sufficient cause, the IC shall have the right to terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the party(ies), 15 (fifteen) days in advance, before such termination or the ex-parte order.
- The inquiry process shall be completed maximum within the period of 90 (ninety) days from the date of receipt of the complaint.
- The IC within 10 (ten) days from the date of completion of inquiry shall provide a report of its findings and recommendation(s) to Corporate HR Head and such report and recommendation(s) shall also be forthwith made available to the complainant(s) and respondent(s).

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- Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code (45 of 1860) or under any other law; it shall be the duty of IC to immediately inform the complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and for any action taken under this Policy.

12.7.3. Interim Relief

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- Transfer the aggrieved individual or the respondent to any other workplace; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restrain the respondent from reporting on the work performance of the complainant.

Once the recommendations of interim relief are implemented, Corporate HR Head shall inform the committee regarding the same.

12.7.4. Prohibition on Disclosure of Information

This policy and the law prohibit any person including IC Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the IC during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to applicable disciplinary action as per company policy. Further the Corporate HR Head shall impose monetary sanctions as per provisions of the Act and Rules.

12.7.5. Harassment by Individuals Outside this Policy

If an aggrieved woman brings to the notice of the IC any instances of sexual harassment where the respondent is not an employee or other individual not covered under this policy, the Management or any person delegated authority by the Management shall provide assistance to the aggrieved woman, if such aggrieved woman so chooses, to file a complaint with the IC of the respondent's employer or under the IPC or any other law for the time being in force, as may be appropriate.

12.7.6. Protection to Complainant

Each Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the 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 and/or produces any forged or misleading document) will be subject to applicable disciplinary action.

12.7.7. Appeal

Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the Act and Rules.

12.7.8. Disciplinary Proceedings

Pursuant to written recommendation of Corporate HR Head on the basis of report and findings of IC and subject to the final outcome of the appeal proceedings, if any, (ref. clause 4-3-7 above) necessary disciplinary proceedings may be initiated against the respondent in terms of the applicable provisions of company policy of the Group.

12.7.9. Savings and Repeal

The erstwhile policy on Prevention of Sexual Harassment hereby stands substituted with this Policy with effect from January 01, 2021. All existing inquiry proceedings and/or appeals initiated under the withdrawn policy will be deemed to have been made under this Policy and same shall continue accordingly.





Anti Bribery & Corruption Policy

Policy History Details	Existing Policy	
Original Issue Date	Apr 2017	
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Revised by	Corporate HR	
Issue Date	Apr 2017	
Effective Date	Apr2017	
Issued By:	Corporate HR Team	

13.(A) Anti Bribery & Corruption Policy (Ethics Policy)

13.1. Scope, Purpose and Applicability:

The principles set forth in this Anti-Bribery and Anti-Corruption Policy shall apply to all J M Baxi group Companies, partnership firms, proprietorships and includes all Entities, Associates and Business Partners across the country, with a zero-tolerance approach to bribery and all types of corruption. This policy applies to all employees at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, Contractual or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with J M Baxi group, across the country and abroad. It guides us to act professionally, fairly and with utmost integrity in all business dealings and relationship, wherever we operate.

Over more than a hundred-year past, J M Baxi & Co. has built a strong reputation for being an ethical and trustworthy group. As a matter of principle, J M Baxi & Co., its employees, associates and business partners do not seek to influence others, either directly or indirectly, by offering, paying or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity. We are firmly committed to uphold these highest standards of integrity and each one of us has a responsibility to protect that reputation by demonstrating honesty and integrity while interacting with our customers, all kinds of business dealings, organizational matters and to adhere to all elements described in this Policy. Our zero-tolerance to bribery and corruption is essential to preserve our corporate reputation and also to preserve our long-term existence.

Provisions under The Prevention of Corruption Act, 1988, The Indian Penal Code, 1860, Prevention of Money Laundering Act, 2002, Central Vigilance Commission Act, 2003, Lok Ayukt Act of respective states, are the legislations that classify bribery as a serious criminal offence in India. Bribery offences can attract the imposition of severe penalties in form of fines, penalties and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, severe reputational damage, etc. amongst other penal

measures. We therefore take our legal responsibilities as well very seriously and strive to uphold all laws relevant to countering bribery and corruption.

13.2. Governance:

The head of the Terminal / Business Unit along with the Human Resources Department of the respective terminals/ businesses has primary responsibility for implementing and monitoring this policy and report to the HR Head of the Group who shall undertake a periodic review, monitor the effectiveness and suitability, update this policy to reflect applicable laws and management decision. However, Management at all levels is responsible to ensure that those reporting to them are made aware of and understand this policy, comply with all such rules with zero tolerance approach (in case of non-compliance) and, if considered necessary, are given adequate training.

Any violation of this policy may have significant consequences, including potential prosecution, fines and penalties for improper conduct as well as the initiation of appropriate legal action which may result into fine or imprisonment and / or disciplinary action including but not limited to termination of the contract, employment of the concerned person associated with the group.

13.3. Policy Framework:

13.3.1. Bribery:

Bribery is offering, giving, soliciting or receiving anything of value with the intention of inducing a person for having acted or agreeing to act in a fraudulent way, resort to any function/s or activities in a dishonest or in impartial way. Bribery includes any such acts which are illegal and which tantamount to breach of trust, duty and good faith.

Anything of value includes, but is not limited to:

- Cash, Cash equivalents (such as gift certificates / cards), stock, personal property and assumption or forgiveness of a debt.
- Gifts, meals, entertainment and travel.
- Job offers or internship awards
- Promise of any gift, hospitality, loan, fee, rewards or any other undue advantage.

It is important to understand that a corrupt act has occurred even if a bribe does not succeed and when one authorizes a bribe but no bribe is ultimately offered or paid.

Bribery includes not only direct payments, but also authorizing or permitting an employee or third party to commit any of the acts or take any part in the actions identified hereinabove.

13.3.2. Corruption:

The definition of “Corruption” includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards. This section covers the following areas:

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- Gifts, entertainment and hospitality
 - Facilitation payments
 - Procurement process
 - Political, Charitable or Community contributions
 - Improper performance of duties
 - Favours regarding recruitment opportunities

13.3.3. What is not acceptable:

- It is not acceptable to:
- Give, promise to give, or offer a payment, gift or hospitality to secure or award an improper business advantage;
- Give, promise to give, or offer a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite, or reward any action or procedure;
- Accept payment from a third party, knowing or suspecting it is offered with the Expectation that it will obtain a business advantage for them;
- Induce another individual or employee to indulge in any of the acts prohibited in this policy;
- Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy;
- Give or accept any gift where such gift is or could reasonably be perceived to be a contravention of this policy and / or applicable laws; or
- Engage in any activity that might lead to a breach of this policy.

13.3.4. Gifts & Hospitality:

This policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations. Gift and Hospitality:

- Must be duly approved. Normal business hospitality must always be approved at the appropriate level of Company management.
- Must not be intended to improperly influence. Employees should always assess the purpose behind any hospitality or entertainment. Hospitality or entertainment with the intention of improperly influencing anyone's decision-making or objectivity, or making the recipient feel unduly obligated in any way, should never be offered or received. Employees should always consider how the recipient is likely to view the hospitality. Similarly, employees must also decline any invitation or offer of hospitality or entertainment when made with the actual or apparent intent to influence their decisions.
- Must not have the appearance to influence decision-making. Employees should think very carefully before making, or receiving, gifts. Gifts can occasionally be offered to celebrate special occasions (i.e. religious holidays or festivals or the birth of a child) provided such gifts do not exceed INR 5000 in value, and are occasional, appropriate, totally unconditional, and in-fitting with local business

practices. No gift should be given or accepted if it could reasonably be seen improperly to influence the decision-making of the recipient.

- Gifts are never acceptable when these are illegal or unethical, or involve cash or cash equivalent (e.g. loans, stock options, etc). As a non-exhaustive example, an invitation to his/her family to join a foreign business trip, or the extension of a trip at the customer's expense to include a holiday, are at all times unacceptable, and employees should not participate in such practices.
- Modest promotional gifts are permitted, e.g. branded pens. Use of one's position with the Company to solicit a gift of any kind is not acceptable. However, the Company allows employees occasionally to receive unsolicited gifts of a very low intrinsic value from business contacts provided the gift is given unconditionally and not in a manner that could influence any decision-making process.
- Even a personal payment for gifts or hospitality in order to avoid the implications of this policy, is also prohibited.
- (In some cultures, it may be seen as an insult to reject a gift, and refusals may adversely affect business relationships. In these circumstances, and if the gift is anything other than moderate, the gift should be reported to the reporting manager who will decide whether such gift will be retained or returned. If the reporting manager is uncertain how to treat the gift, he/she should seek clarification from his/her relevant Human Resource (HR) contact.).

13.3.5. Donations & Political Contributions:

Charitable donations / political contributions can be made which are legal and ethical under the local laws and practices. No such donations or contributions should be made without prior approval of the Terminal Head / Business Head. It is recommended that all such donations or contributions are documented with a receipt.

13.3.6. Raisings Concerns / Protections as Available:

- Every employee or associate is encouraged to raise concerns about any bribery issue or suspicion of malpractice or any case of corrupt practice or any breach of this Policy or applicable anti-bribery, anti-corruption law at the earliest possible stage. If he/she is unsure whether a particular act constitutes bribery or corruption or if he/she has any other queries, these should be raised at the following email address: **ethics.policy@jmbaxi.com**
- Any employee or an associate who refuses to accept or offer a bribe, or who raise concerns or report another's wrongdoings, are sometimes worried about possible repercussions. J M Baxi & Co. Group encourages aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even it turns out to be mistaken.
- J M Baxi & Co. group is committed to ensuring that no one suffers any detrimental treatment (like, dismissal, disciplinary action, threats or any unfavourable treatment) as a result of refusing to take part in corruption or in raising concerns under this policy in good faith. In such a case, the aggrieved

person should inform his/her reporting manager or HR manager / the HR Head of the group, immediately. If the matter is not resolved, the concerned employee should raise the matter by following the procedure laid out in the Whistle Blower Policy.

- In case of continued negligence to get remedies, one may also raise concerns or queries to the Chairman of the Audit Committee of the particular company in which he/she is engaged.
- Any employee may at any report the genuine concern which shall not be with a malafide intention, OR observation of non-compliance of this policy to the following email id ethics.policy@jmbaxi.com

The details of the person shall be kept confidential.

13.3.7. Facilitation payments and kickbacks:

The Company prohibits making or accepting, facilitation payments or "kickbacks" of any kind. Any request for a facilitation payment should be refused unless you feel you are at risk of injury, of detention, or for your life, if you refuse. In any of such exceptional circumstances, a receipt should be obtained and the matter should be reported, as soon as possible.

13.3.8. Use of Third Parties, Consultants and Other Intermediaries:

Companies cannot avoid liability by using a third party to give or receive a bribe. A third party includes, but is not limited to Agents, Consultants, Advisors, Representatives, Contractors / sub-contractors, Service providers. All dealings with suppliers, agents, contractors, service providers, intermediaries, consultants, and advisors, shall be carried out with the highest standards of integrity and in compliance with all relevant laws and regulations. We must clearly convey to third parties representing the Company that we expect them to comply our Anti-Bribery and Anti-Corruption policy and to respect our values and the ethical standards. The following should be kept in mind prior to engaging a third party:

- Appropriate due diligence is conducted and properly documented;
- Formal commitment (in writing) is sought from the third party to ensure compliance to these standards;
- Appropriate anti-bribery and anti-corruption provisions are incorporated in the contracts in consultation with J M Baxi & Co. group Legal team, including the right to audit, as well as a clause on termination, if such third party fails to abide by the anti-bribery and anti-corruption terms.

13.3.9. Interaction with Government Officials:

Laws and regulations are strict when dealing with Government officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when Government officials are involved. Even when any benefit is being offered is small, such as gifts, entertainment, business meals, that would constitute a bribe. So, whenever you will deal with government officials or a state-owned (or fully or partially) company, you have a special duty to know and comply with applicable laws and regulations, adhere to the highest standards of integrity. Before any expenses are incurred, you must obtain prior approval from the Terminal Head / Business Head.

13.4. Responsibilities of employees:

Employees must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy. All employees are required to avoid any activity that might lead to or indicate a breach of this policy. Employees must notify their reporting manager or consult Human Resource (HR) team as soon as possible if they believe or suspect or have a reason to believe or suspect that a breach of this policy has occurred, or may occur in the future. A failure to report an actual or suspected breach of this policy is itself a breach of this policy. Any employee who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate a contractual relationship with the employees, terminate services of an employee and other employed persons, as the case may be, if they breach any of the terms and conditions of this policy.

13.5. Keeping of Records & Internal Controls:

Respective companies and establishments will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to, and receiving payments from, third parties. Employees must declare and keep a written record of all hospitality, or gifts accepted or offered, which will be subject to managerial review and/or a review of Company's Human Resource (HR) team. Employees must ensure that all expense claims, regardless of value, relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company's applicable policy and specifically record the reason for such expenditure. Employees shall further ensure that all expense claims shall comply with the terms and conditions of this policy. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No records shall ever be kept "off-book" to facilitate or conceal improper payments.

In case books and records do not accurately reflect a transaction or expense, the concerned employee / associate must report this issue immediately to the appropriate authority.

13.6. Training & Communication:

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing employees. If you have any queries about this policy, you should contact your reporting manager. Group's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter. Wherever possible, all third parties should be sent a copy of this policy at the outset of the business relationship.

13.7. Responsibility for the Compliance of the Policy:

The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Terminal Head / Business Head along with the Head of Human Resource Department of the respective terminal / business has primary day-to-day responsibility for implementing this policy who will act under the guidance of the Group HR Head. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and considered appropriate, are given adequate and regular training on it.

13.8. Potential Risk Scenarios – “Red Flags”:

This section contains a list of possible red flags that may arise during the course of business. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any red flags, you must report them promptly to the appropriate authority or by following the procedures set out in the Whistle Blower policy:

- Being aware that a third party engages in, or has been accused of engaging in, improper business practices;
- Learning that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- A third party insists on receiving a commission or payment of fees before committing to sign up to a contract with us, or carrying out a government function or process for us;
- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- A third party requests an unexpected additional fee or commission to "facilitate" a service;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- A third-party requests that a payment is made to "overlook" potential legal violations;
- A third-party requests that you provide employment or some other advantage to a friend or relative;
- You receive an invoice from a third party that appears to be non-standard or customised;
- A third party insists on the use of side letters or refuses to put terms agreed in writing;
- You observe that the Company has been invoiced for a commission or fee payment that appears large compared to the service stated to have been provided
- A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the Company; and/or (n) You are offered an unusually generous gift or lavish hospitality by a third party.

13.9. Few Examples of Bribery:

This section contains a list of examples of prohibited bribery. It is not intended to be exhaustive and is for illustrative purposes only.

- Offering a bribe
You offer a potential customer a ticket to a major sporting event, but only if they agree to do business with us. This would be an offence (by you) as you are making the offer to gain an improper commercial and contractual advantage. The Company may also be found to have committed an offence because the offer has

been made improperly to obtain business for us. It may also be an offence for the potential customer to accept your offer.

➤ **Receiving a bribe**

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain an improper personal advantage.

13.10. Exception(s):

Any exceptions to this Policy must be approved by the Terminal Head / Business Head in consultation with the Group HR Head.

13. (B) Prevention of Money Laundering

13.11. Policy Statement & Purpose:

The Government of India has enacted the Prevention of Money Laundering Act, 2002 and issued rules and regulations thereunder ("PMLA") for preventing money laundering and countering the financing of terrorism in India, with effect from July 1, 2005. The PMLA defines the offence of money laundering as "Whosoever directly or indirectly attempts to indulge or knowingly assists or is a party in any process or activity connected with the proceeds of crime and projects it as untainted property, shall be guilty of offence of money laundering."

The phrase "money laundering" is generally understood to mean any act or attempted act to conceal or disguise the true origin and ownership of illegally obtained proceeds so that they appear to have originated from legitimate sources thereby avoiding prosecution, conviction and confiscation of the illegal proceeds. Money laundering can be used by terrorist organizations, tax evaders, smugglers, by those engaged in bribery, or anyone who receives money for illegal activities or through illegal means.

Money laundering can be used by terrorist organizations, tax evaders, smugglers, by those engaged in bribery, or anyone who receives money for illegal activities or through illegal means. Countering money laundering is of critical importance as it ensures that illegal funds do not remain hidden and do not get integrated into legal business and consequently into the legal economy.

Money laundering usually consists of 3 (three) steps:

➤ **Placement:**

This is the initial stage and during this stage, the money generated from illegal/criminal activity such as sale of drugs, illegal firearms, etc. is disposed of. Funds are deposited into financial institutions or converted into negotiable instruments such as money orders or traveller's cheques. For example, cash received by a drug smuggler can be taken to a bank and changed into a money order or traveller's cheque.

➤ **Layering:**

In this stage, funds are moved into other accounts in an effort to hide their origin. This is achieved by creating layers of transactions, by moving the illicit funds between accounts, between businesses, and by buying and selling assets on a local and international basis until the original source of the money is virtually untraceable. Thus, a trail of unusual complex transactions is created to disguise the original source of funds and thereby to make it appear legitimate.

For example, money can be moved into and out of various offshore bank accounts through electronic funds transfers.

➤ **Integration:**

Once the illegitimate money is successfully integrated into the financial system, these illicit funds are reintroduced into the economy and financial system and often used to purchase legitimate assets, fund legitimate businesses, or conduct other criminal activity. The transactions are made in such a manner so as to appear as being made out of legitimate funds.

At J M Baxi, we are committed to complying with all applicable PMLA laws in the conduct of our business. Our employees and associates acknowledge that failing to detect customer relationships and transactions that place our Company at risk, could cause irreparable harm to our reputation. So, the employees and associates related with this group make it as an obligation to take all precautionary measures to detect any such money laundering process and carry out necessary due diligence before entering into any contract/s. Towards this objective, we must conduct business only with reputed customers who are involved in legitimate business activities and whose funds are derived from legitimate sources.

13.12. J M Baxi & Co. Group – Anti Money Laundering Policy:

The purpose of this Anti-Money Laundering Policy (“AML Policy”) is to prevent any involvement by J M Baxi & Co. group in money laundering activity even where the involvement may be unintentional. It requires our directors, officers, other employees and those who work with us to recognize questionable financial transactions, and to take steps to conduct appropriate additional due diligence. If any ‘Red Flag’, whether or not listed in this AML Policy is triggered, the concerned persons need to promptly contact the Departmental Head / Regional HR Head / Terminal Head / Business Head to facilitate any further due diligence or action that may be needed. This Group is committed to cooperate with the law enforcement and regulatory agencies enforcing anti-money laundering laws and regulations.

This AML Policy constitutes a minimum standard. It must be complied with in any country in which this Group does business even when the policy is stricter than the anti-money laundering laws that are applicable in that country, including both applicable local laws and those laws with extra territorial application. However, when applicable anti-money laundering laws are stricter than this policy, such laws must be complied with.

The guidelines in this AML Policy supplement the Employee Code of Conduct and should be read in conjunction with:

- Employee Code of Conduct
- The Whistleblower Policy;
- The Anti-Bribery and Anti-Corruption Policy;
- Any guidance or notification in relation to this policy;
- Any other relevant policies as may be implemented from time to time.

Because no code of conduct or policy can cover every possible situation, our Company or Group as a whole relies on the Employee to use good judgment and to speak up when they have either questions or concerns.

13.13. Scope & Applicability:

This AML Policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, contractual or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with our Company and such other persons including those designated from time to time.

The Terminal Head / Business Head of the respective terminals / businesses along with the Human Resources Department of the terminal/ business has primary responsibility for implementing this policy and report to the HR Head of the Group who shall undertake periodic review, monitor the effectiveness and suitability, update this policy to reflect applicable laws and management decision. Management at all levels are responsible to ensure that those reporting to them are made aware of and understand this policy, comply all such rules with zero tolerance approach (in case of noncompliance) and, if considered necessary, are given adequate training.

13.14. Compliance & Monitoring:

Unless otherwise specified, the Terminal Head / Business Head along with the HR Head of the respective Terminal / Business will ensure compliance with all rules & regulations under PMLA and for the purpose with the provisions of this AML Policy. All queries, reports, complaints, doubts or concerns in relation to application of PMLA and this AML Policy shall be raised by the Designated Persons to the Terminal Head / Business Head. Any action required to be undertaken under this AML Policy shall be taken by the Terminal Head / Business Head jointly with the HR Head of the Group in accordance with this AML Policy. Based on the quarterly reports from the Terminal Head / Business Head, the Managing Director / CEO along with the Company Secretary shall submit quarterly compliance reports to the Board of Directors, inter-alia, highlighting exceptions to the AML Policy.

Money laundering is a global problem, and many countries, and organizations have enacted laws to combat it. Compliance with AML and anti-terrorism laws and regulations requires an awareness of possible 'Red Flags' or suspicious activities, which may arise in the course of conducting business. When 'Red Flags' are identified, an appropriate level of additional due diligence must be performed and additional approvals should be obtained.

13.15. Potential Red Flags:

While an exhaustive list cannot be provided, mentioned below are the indicative actions or situations or parties that employees should be careful about – which when appearing together or individually should be raised as 'Red flag' concerns (each, whether or not listed herein, a "Red Flag"):

- Customers or suppliers who are connected to countries identified as noncooperative by the 'Financial Action Task Force on Money Laundering' established by the G-7 Summit in 1987, and international organisations against money laundering.

- Customers or suppliers who are reluctant to provide complete information and/or provide insufficient, false, or suspicious information or who are unwilling to comply with our Company's KYC norms as may be in force from time to time.
- Customers or suppliers who appear to be acting as an agent for another company or individual but decline or are reluctant to provide information regarding that company or individual.
- Customers or suppliers who express concern about, or want to avoid, reporting or record-keeping requirements.
- Payments of amounts exceeding Rs.20,000/- (Rupees Twenty Thousand) only made in cash or cash equivalents, such as money orders, traveller's cheques, internet currencies or prepaid cash cards. Acceptance of such amounts of cash or cash equivalents as a form of payment by our Company is strongly discouraged. Cash payments are commonly used by money launderers and leave very little in the way of audit trails. Alternative methods of payment which provide a stronger audit trail should be offered.
- Particular care should be taken with regard to customers and suppliers who structure these payments to avoid the relevant government reporting requirements for cash and cash equivalent payments (for example by making multiple smaller payments or payments from multiple sources).
- The purchase of products, or a larger volume purchase, that appears to be inconsistent with a customer's normal ordering pattern, and in the absence of any legitimate business reason such as a special price promotion.
- Complex deal structures or payment patterns that reflect no real business purpose or economic sense.
- Requests for payment to be made through an unrelated country or to an unrelated third-party.
- Multiple partial payments from various parties on behalf of a single customer and/or multiple partial payments from various locations. Also included are "double endorsed" or "third party" cheques, where a customer endorses over to a company as payment for their invoice a cheque that was originally made out to the customer.
- Customers or suppliers whose address is not a physical site.
- Customers making a funds deposit followed by an immediate request that the money be wired out or transferred to a third party, or to another firm, without any apparent business purpose.
- Customers paying in one form of payment and then requesting a refund of the payment in another form e.g. paying by credit card and requesting a wire transfer or cash refund.

13.16. Compliance Steps:

Each Employee is required to ensure that he/she undertakes the following steps in course of the business operations of the Company or any other establishment under J M Baxi & Co. group, where he is engaged, and in relation to his responsibility towards money laundering:

- **Know Your Customers (business partners) (KYC):** Where appropriate, Employee should conduct integrity assessments and other due diligence exercises and be familiar with business practices of customers and suppliers.
- **Monitor financial activity:** Employees are required to observe and record payments and transactions consistent with all established policies and

procedures and follow global financial standards for acceptable forms of payment.

- **Keep complete records:** Employee should always keep current, complete and accurate records of every business transaction.
- **Report any suspicious activity:** Each Employee has an obligation under this AML Policy to immediately and, without delay, report to the Terminal Head / Business Head or by emailing it to ethics.policy@jmbaxi.com about any Suspicious
- **Transaction (as defined below) or suspicious activity or 'Red Flag' concern ("Report"):** Each Employee shall be aware of and follow country legal requirements for the reporting of cash transactions.
- **Reporting/Action by the Terminal Head / Business Head:** When setting up internal procedures, the Terminal Head / Business Head may adopt a 'risk-based approach' to KYC and AML compliances. Consequently, there will be circumstances when it will be both necessary and permissible to apply commercial judgment to a Report received by the Terminal Head / Business Head.

Based on the facts and circumstances of an incident covered in a Report, the Terminal Head / Business Head shall take one or more steps, such as:

 - Probe into the incident himself/herself
 - Set up an internal enquiry into the incident
 - In case of aggravated Cases determine and recommend whether a reporting of the incident should be made to the appropriate authority.
- **Cooperate fully for enforcing anti-money laundering laws:** The Terminal Head / Business Head shall be the Company's point of contact for coordinating with all law enforcement and regulatory agencies for all compliance reporting and investigations.
- **Maintenance of records:** Records confirming the identity of customers, suppliers, contractors, investors and other persons should be retained for such number of years as prescribed in the Know-Your-Customer policy of our Company.

13.17. Violations:

Violations under this AML Policy include the following actions by an employee:

- Any violation of the compliance steps under this AML Policy by an employee;
- On-boarding a customer, supplier, contractor, agent, or investor in contravention of the KYC Policy;
- Requesting others to violate the AML Policy;
- Failure to promptly raise a known or suspected violation of the AML Policy or notify a potential 'Red Flag' or suspicious transactions;
- Failure to cooperate in investigations of possible AML Policy violations;
- Retaliation against another employee for reporting a concern under the AML Policy;
- Failure to demonstrate leadership, initiative, and diligence to ensure compliance with the AML Policy, PMLA and other applicable laws;
- Involvement in any form of money laundering activities, whether in the course of employment with any Company or any other organization under J M Baxi & Co. Group or, otherwise.

13.18. Consequences of Violation of ALM Provisions by an Employee:

In case of violations of the AML provisions, the Terminal Head / Business Head in consultation with Group HR Head shall, have the discretion to do the following:

- **Corrective Action:**
If necessary, corrective actions shall be prescribed to appropriate managers, officers, or other employees for implementation.
- **Penalties:**
Based on the investigation reports (if any), appropriate disciplinary action, including suspension and termination of service, against such a defaulting employee may be recommended.
- Depending on the nature and scale of default of the AML Policy by the defaulting Employee, civil and/or criminal proceedings against such an employee in order to enforce remedies available to our Company under applicable laws.

Vendor Affirmation to Ethics Policy

We, M/s. _____ ('Service Provider/Contractor') having PAN _____/GSTIN _____ hereby confirm and affirm the following:

1. We have read and understood the Ethics policy of J M Baxi & Co. Group / International Cargo Terminals and Infrastructure Private Limited (ICTIPL).
2. We have not indulged in any activity that potentially violates the provisions of Prevention of Money Laundering Act 2002, Prevention of Corruption Act 1988 and Indian Penal Code 1860 pertaining to prevention of all or any activities related to corruption.
3. We have not indulged in any activity that potentially violates any of the provisions of the Ethics policy. Any breach including a potential breach constitutes a material breach of any contract, existing or potential, with the Company.
4. We acknowledge and agree that ICTIPL shall not be under any obligation to carry out any action or make any omission under any Contract to the extent that ICTIPL reasonably believes that it would be in breach of any extant Anti-Corruption Legislation.
5. We have, and will maintain in place, adequate procedures designed to prevent any Associated Person or Third party with whom we are associated, from undertaking any conduct that would give rise to an offence under the Prevention of Money Laundering Act 2002, Prevention of Corruption Act 1988 and Indian Penal Code 1860.
6. We and each of our employees, directors, officers, subcontractors, agents and representatives that will do anything on its behalf in relation to its selection as the Service Provider and the performance of its obligations under this Contract, has not taken, and will not take, in the name of, for the account of or on behalf of ICTIPL, any actions in furtherance of (and it has not omitted to and will not omit to take any action preventing):
 - i. An offer, payment, gift, promise to pay or give, or authorisation of the payment or giving of any money or anything else of value to any public official or to any other person or entity; or
 - ii. The request for, agreement to or acceptance of any payment, gift, money or anything else of value, in each case, which constitutes a breach of any Anti-Corruption Legislation.
7. We will keep accurate and detailed books, accounts, and records on all business activity conducted pursuant to our contractual dealings with ICTIPL.

8. Subject to such reasonable restrictions as may be mutually agreed, at the request of ICTIPL, we will confirm in writing that we have complied with the undertakings under clauses 1 to 7 above and will provide access to such people and/or information reasonably requested by ICTIPL in support of such compliance.

Personal Commitment to affirm to the Ethics Policy of J M Baxi & Co. Group of Companies

I acknowledge that I have read and familiarized myself with the Anti Bribery & Anti-Corruption / Ethics policy of J M Baxi & Co. Group (-----name of entity) and understand my obligations as an employee.

I undertake to affirm and uphold the principles of the Ethics policy and shall endeavour always to comply with the principles stated therein during the term of my employment (including any amendments, if any, from time to time).

Signature: _____ Date: _____

Name: _____ Employee ID: _____





Policy on Equal Opportunity & Non-Discrimination

Policy History Details	Existing Policy	
Original Issue Date	Aug 2019	
Revision Date	Aug 2019	Revision No:
Revised by	Corporate HR	
Issue Date	Aug 2019	
Effective Date	Aug 2019	
Issued By:	Corporate HR Team	

14. Policy on Equal Opportunity & Non-Discrimination

The Equal Opportunity and Non-Discrimination Policy has been formulated to give effect to the legal provisions and obligations of private establishments under the aegis of Rights of Persons with Disability Act (RPDA) 2016.

J M Baxi group is committed to establishing and maintaining a non-discriminatory and inclusive culture in all its offices, which provides an equal opportunity to get employment and pursue a career irrespective of disability, besides religion, caste, creed, sex, region or place of birth.

14.1. Objective:

The objective of this Policy is to lay down guidelines so as to ensure non-discrimination towards persons with disabilities with respect to their employment in the group.

14.2. Scope and Applicability:

This policy extends to and is applicable to persons with disabilities, including applicants, full-time / part -time, employees, interns, trainees etc. across all group companies and offices of J M Baxi Group and persons with disabilities.

14.3. Guidelines:

- Persons with disability will be accorded the same treatment at the time of recruitment and evaluation and subsequent appointment will be dependent on job, functional and behavioural abilities, as assessed during the selection procedure.
- Persons with disabilities will be eligible for consideration for employment for all positions, except where the nature of disability is such that it will not be possible for the candidate to discharge his / her duties, even after being provided with appropriate assistive equipment / enablers.
- In case of an employee suffers or acquires a disability during the course of employment, he/ she will not be discriminated against and the organization, shall, to the possible extent, make all reasonable accommodations, including assigning a different role at the same level / compensation, to enable the said employee to continue his / her employment.
- Persons with disabilities will not be discriminated against in terms of their terms and conditions of employment and applicability of organizational policies / practices, including career advancement and growth.

- The person with a disability shall not be discriminated against for any reason whatsoever unless it is shown that the impugned act or omission is a proportionate mean of achieving a legitimate aim.
 - In such an instance, the aggrieved person shall be informed in writing as to how the impugned act or omission is a proportionate means of achieving a legitimate aim.
- Office buildings / workplaces will be designed in accordance to the appropriate laws / guidelines as framed by the appropriate government authority in line with the Act.

14.4. Complaint Process and Procedure:

- Any person who wishes to make a complaint regarding discrimination can do so to the HR Head of the company, within 5 working days of the incident.
- The HR Head shall review the complaint with the Anti-Discrimination Committee, which shall investigate the said complaint.
- The committee, may interview the complainant and other person(s), including the respondent (in case the complaint has been filed against an individual or a group of people) as part of the investigation and conclude its investigation within 10 working days of receiving the complaint.
- The investigation committee, based on the results of the investigation, may recommend appropriate corrective action to the appropriate authority in the organization.
- The documents and the process for investigation, including complaint, investigation articles and results will be kept confidential.
- The Anti-Discrimination Committee at the company will comprise of the HR Head and the Business Head / Terminal Head.
- The respective party (complainant / respondent, as the case may be), can appeal to review the investigation outcome to the Group HR Head within 10 days of being notified of the outcome.
- The result of the review process will be binding on all parties.

14.5. Maintenance of Records:

Each establishment shall maintain the records of persons with disability employed specifying the following particulars:

- Number of persons with disabilities who are employed and the date from when they are employed.
- Name, gender and address of persons with disabilities.
- Nature of disability of such persons.
- Nature of work being rendered by such employed person with disability.
- Kind of facilities being provided to such persons with disabilities.

14.6. Liaison Officer:

- HR Head of each company shall be the default Liaison Officer under the Rights of Persons with Disabilities Act 2016.
- The Liaison Officer shall:
 - Look after the recruitment of persons with disabilities and provisions of facilities and amenities for such employees.
 - Maintain records of disabled persons employed by the establishment.

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- Maintain records of the complaints filed and investigations conducted with investigation outcome and actions taken.





Human Rights Policy

Policy History Details	Existing Policy	
Original Issue Date	Sept 2020	
Revision Date	Sept 2020	Revision No:
Revised by	Corporate HR	
Issue Date	Sept 2020	
Effective Date	Sept 2020	
Issued By:	Corporate HR Team	

15. Human Rights Policy

Humility is one of our core values and forms an essential element of a business ethos.

As a responsible corporate house J M Baxi group recognises its responsibility towards mankind and thus respect and honour the human rights. J M Baxi group is committed to respecting all locally/internationally recognised human rights as relevant to our operations and recognises and adheres to the principals concerning fundamental rights set out in the international Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at work.

Our commitment entails respecting human rights and seeking to avoid involvement in human rights abuses identifying, assessing and minimising potential adverse impacts through due diligence and effective management of issues. Every entity of the group endeavours to achieve this commitment by way of the adhering to the principles enlisted hereinafter.

15.1. Human Rights:

Every business unit shall support and respect the protection of internationally proclaimed human rights. Every business unit must comply with all applicable loss and respect international recognised human rights, whenever they operate and not implicate it into any activity that might implicate it in human right abuse.

Every business unit shall, in its operations and day to day practices, abide by this commitment of the group to respect human rights.

15.1.1. In the Workplace:

- By providing safe and healthy working conditions
- By guaranteeing freedom of association
- By ensuring non-discrimination in personnel practices
- By ensuring that it does not use directly indirectly forced labour or child labour
- By providing access to human amenities for the workers and their families, if these are not provided elsewhere
- By making reasonable accommodation for all employees' religious observance and practices

15.1.2. In the community:

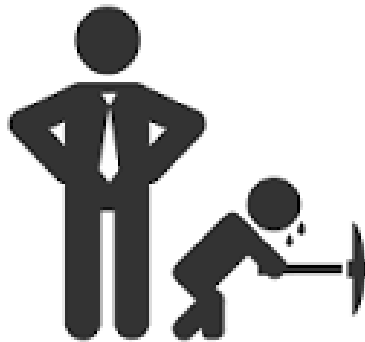
- By preventing the possible displacement of individuals, groups or communities

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- By working to protect the economic livelihood of all local communities
 - By contributing to the public debate by allowing the direct and indirect employees to voice their views on matters that affect the operation, employees, customers and the communities of which they are a part.
 - By fostering opportunities for women to empower and excel.
 - Wherever the business operations use the security services to protect their operations, they must ensure that existing international guidelines and standards for the use of the workforce are respected.

15.2. Remedial action:

Should it be observed or brought to the notice by way of reference or complain, appropriate action shall be taken by the respective business unit depending on whether the action or lack of it has caused or contributed towards human rights abuse and the company should cause to cease such practice or prevent the impact as may be best suitable depending upon the case and the decision of the person in charge from the human resource department (Corporate HR Head) shall be final and binding in this respect.





Child Labour Policy

Policy History Details	Existing Policy	
Original Issue Date	Jun 2020	
Revision Date	Jun 2020	Revision No:
Revised by	Corporate HR	
Issue Date	Jun 2020	
Effective Date	Jun 2020	
Issued By:	Corporate HR Team	

16. Child Labour Policy

16.1. Vision:

Market Leader in every segment of logistics and shipping support service with a social conscience.

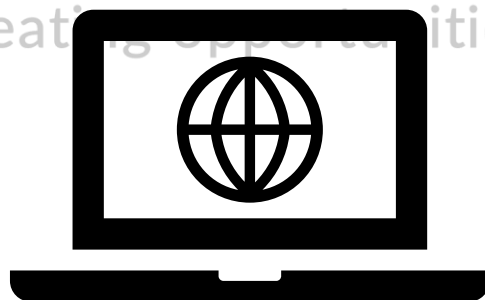
16.2. Commitment:

The management of JM Baxi group is committed to comply with the requirements of prohibition of child labour. In view thereof, the management hereby prescribes the policy on prohibition of child labour that would be applicable to and adhered by all the entities of the group (individually referred to as the Company hereinafter) which is as follows:

- The company does not employ child labour no does it support the use of child labour or forced or bonded labour of any sorts, directly or indirectly, and the Company shall at all times be in the compliance of the Child Labour (Prohibition & Regulation) Act, Bonded Labour System (Abolition) Act, 1976 and the Contract Labour (Regulation & Abolition) Act, 1970 and such other applicable provisions of the law at all times.
- The minimum age for recruitment for all levels of employees shall be in accordance with the applicable legal framework and in compliance with the applicable legal requirements from time to time.
- The Company shall not engage in or support or encourage employment of child labour in accordance with the convention 138 of international Labour Organisation (ILO) nor does the Company support or engage the use of first or compulsory labour as defined in ILO Convention 29 nor shall personnel be required to pay “deposits” or lodge identification papers with the company upon commencing employment.
- The company shall establish, document maintain and effectively communicate to its personnel, contractors and their sub-contractors, if any, and other interested parties, policies and written procedures for remediation of children found to be working in situation of child labour as above.
- It shall be ensured that any contract employees engaged through contractors and working in Company's premises/ Terminal shall also be in compliance with applicable legal provisions in this respect.

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- At the time of employment, it shall be ensured that all employees are above or at least of minimum age as at out by law. This shall be ensured by checking the age of all employees from age records as evidenced by birth certificates, school records or certificate of age proof from a certified medical practitioner/ dental surgeon.
 - The Company shall retain a copy of the document submitted by the employee as proof of age, after suitable verification, in the personnel file.
 - At the time of employment, the Company shall obtain signed application forms from the employee stating, among other things, his/her age and date of birth.
 - Periodic review of the performance of the process and procedures aimed at prohibiting child labour implemented in the Company shall be carried out during which the documents in support of age are also reviewed.
If any children are found to be employed in the Company, the remediation shall be in accordance with the applicable legal framework.
 - Signage to be placed at the prominent place that “The Company is in compliance with the Child Labour (Prohibition & Regulation) Act”.





IT Policy

Policy History Details	Existing Policy	
Original Issue Date	Apr 2017	
Revision Date	Apr 2017	Revision No:
Revised by	Corporate HR	
Issue Date	Apr 2017	
Effective Date	Apr 2017	
Issued By:	Corporate HR Team	

17. IT Policy

17.1. Purpose:

The purpose of this policy is to ensure:

- The provision of reliable and uninterrupted IT support & services
- The integrity and validity of data.
- An ability to recover effectively and efficiently from disruption.
- The protection of all the IT assets of Company including data, software and Hardware & removal media.

Management shall ensure that the requisite levels of information asset protection are provided through compliance with this policy.

17.2. Scope:

This policy applies to all employees, contractors, consultants, and temporary staff etc. using Company's computing resources. All are expected to be familiar with and comply with this policy.

17.3. Policy:

The term IT assets relates to all IT hardware device which carries official data in any form viz. desktop, laptop, Tablets, ipad's, blackberry, smartphones, Network based Xerox Machines etc.)

17.4. Network Access:

- Information is a company asset and must be managed to ensure its confidentiality, integrity, and availability for authorized business activities. All information must be safeguarded against unauthorized modification, disclosure, or destruction, using controls that are commensurate with its value.
- User Identification & Password
 - Login passwords must not be written down or disclosed to another individual. The owner of a particular username will be held responsible for all actions performed using this username.
 - Requests for new computer accounts and for termination of existing computer accounts must be formally authorized by HR and sent in writing in advance to IT by HR.

- Requests for additional access to specific business applications or folders/files/rights must be authorized in writing by the Reporting Authority/ Application owner and sent to IT in advance.
- HR department must notify IT and Admin in advance when moving any personnel to a new location so that It takes appropriate precautions in relation to the data security & IT asset.
- Passwords used should not be easily guessed so the password must have atleast 8 characters & must have alpha numeric character with one special character in place.

17.5. Access to Company's Information:

- All information held on the networks including e mail, file systems and databases are the property of Company and Company personnel should have no expectation of privacy for this data.
- Data and software stored on a Company's PC are Company's property any unauthorized deletion of files or software or unauthorized copies of any programs, files & data is prohibited, also the same must not move out from the Company's premises - either physically or electronically.
- Requests to access the computer account of a colleague who is absent from the office must be directed to IT in writing with the approval of the "Relevant" Functional head/Manager.
- Office personnel must not issue any information to third parties unless they have authorization to do so.
- Users are only permitted to access electronic information and data that they require to perform their duties. If the users find that they have access to information that they are not concerned with, IT or their Functional head should be intimated of the same immediately.
- If confidential information is lost, either through loss of a notebook computer, backup media or other security breach, IT must be notified immediately.

17.6. Personal Use of Computer Systems:

IT assets provided to Company personnel is for business use, it is not acceptable to use them for personal use.

17.7. IT Assets Security:

17.7.1. General

- IT assets must not be left unattended for long periods while signed- on e.g. during lunch, coffee breaks, etc. Users must either logoff, lock workstations & switched off the monitor when not in use. And on closer of office hours IT assets must be switched off in all respect.
- IT assets must not be removed from Company's premises unless written approval has been received from IT. All equipment being sent for service/ repairs/ relocation etc must be signed for in a Gate Pass available at front desk security.
- BYOD (Bring Your Own Device) shall be allowed to Company's personnel subject to management approval.

17.7.2. Software

Any Software viz licensed, in-house etc must not be copied, removed or transferred to any third party or non-company equipment such as home PCs without written authorization from IT.

17.7.3. Confidentiality

- Confidential data held on computer media (e.g. CD-ROM, DVD, removal media) must be stored securely when not in use.
- All company related unwanted information must be disposed by shredding / destroying the media completely, so that the information is not recoverable by anyone.

17.7.4. Computer Viruses

- Corruption of PC's or notebook's data or software by malicious software (e.g. a computer virus or a worm) must be reported to IT immediately.
- Users are **not permitted to disable or remove antivirus** software under any circumstances.
- Virus, Trojan, hoaxes are common. If propagated by innocent recipients, hoaxes cost time and money. Please do not forward virus warnings and chain mails whatever the source to any employee, other than to IT.

17.8. Internet & Email:

General

- All Company personnel have a responsibility to use the Internet in a professional, ethical and lawful manner. Users must regard Internet access as a privilege, which can be revoked if found being misused.
- Company will accept no liability for losses arising through the transmission of personal or financial information (e.g. Credit Card / Debit Card or any online media numbers) over the Internet.
- Users must not publish data on the Internet without the express prior written permission of Head Compliance Officer.
- Users shall not enter legally binding contractual commitments using the Internet, either by Internet email or through the use of the World Wide Web, except where you have been authorized by the relevant Chief Executive Officer.
- The use of, or access to, web-based e-mail systems, such as 'Hotmail, Gmail', for business purposes is forbidden including web sites which are no value addition to business purpose.
- All emails that are sent externally must carry a standard Company disclaimer. Users must not attach their own disclaimers to emails.

17.9. Telecommunications

Remote Areas

- Remote Access can be defined as "Access to Company's IT resources or data from a location external to Company. This access may be by a third party or an employee who is located off-site.
- For cost and security reasons remote connections must be closed as soon as the purpose of remote access has been met with.
- Third Party Access can only be provided after the Third Party has signed a confidentiality agreement that must be included in their formal contract with Company.

Company personnel must never permit another individual to utilize their username to access the Company network.

17.10. Software Licenses:

Copyright

- All software developed within and or for Company is the property of respective Company and must not be copied or distributed without prior written authorization from the IT & Management.
- The unauthorized installation of software on Company's IT assets is forbidden.

17.11. Data backups:

Users must inform the IT of their critical data so that the IT will take necessary action for the backups of the important data. This ensures that the data is available for recovery purposes. However, IT should not be held responsible if the file/ folder apart from the user mentioned is not backed up.

17.12. Pornography:

If users find any image(s) or media (picture, graphic, booklet, audio tape, video etc.) of pornographic nature on Company PCs, notebook computers or servers, they must report it to the IT & Company reserves right to take appropriate action.

17.13. Damage to IT Equipment:

Intentional or threatened damage to data or IT infrastructure will not be tolerated. While in your possession you must take the necessary precautions to protect data and equipment provided to you.

17.14. Collection of Personal Information:

If users have access to personal information, users must ensure that it was obtained fairly, is accurate, protected against unauthorized disclosure, used only for the purpose(s) for which it was collected and is held no longer than is necessary for that purpose(s).

17.15. Auditing and Monitoring:

- IT Asset – IT personnel reserves the right to access any IT hardware if found suspicious in accordance with the IT policy.
- Email & Internet - Company reserves the right to review, audit, intercept, access, block access to sites deemed unacceptable and disclose all access to the Internet. This includes emails sent and received in addition to websites visited and files downloaded from the Internet.

17.16. Software:

Regular reviews of IT hardware & license and or in house software are undertaken and the presence of unauthorized software will be investigated. Company reserves the right

to remove any files, data and Software from systems including any information it views as offensive, illegal or personal.

➤ **Software Change Control**

All alterations to system and application software must follow change control procedures to ensure the integrity of Company computer systems. For major changes this should include:

- Authorization of request for change
- Risk assessment of change
- User Acceptance Testing
- Relevant Functional Head/Manager sign-off
- IT sign-off Roll back procedures in the event that the change failed, on case basis.
- Release notes for the changed software.
- Adequate controls should be in place over any test data that is used in the testing process, as this data quite often is a mirror of live data.

➤ **Physical Security**

The following standards must be applied to Server Room Access

- Access to the Server rooms (Data Centre) must be restricted to authorized & nominated IT personnel's only & the same will be monitored regularly with the help of logbook maintained in the Server room.
- Third parties who have been granted access to the Server Rooms must be accompanied at all times by IT personnel.
- Access to the Server rooms must be controlled by a physical access control mechanism such as an electronic/combination lock.

➤ **Fire Detection / Prevention**

The Server Rooms must be fitted with smoke/fire detectors and fire extinguishing equipment, which should be set to automatic operation when the computer room is left unattended for long periods.

➤ **UPS / Backup Generator**

The entire Server room and the equipment housed within it must have a UPS backup to protect against power surges/failures.

➤ **Control of Computer Media and Backup Documentation**

- Computer media e.g. tapes and documentation must be stored securely, e.g. in locked cabinets or vaults, when not in use.
- Magnetic media that is no longer required and which may contain confidential data must be disposed of securely, i.e. all data must be erased, or the media must be rendered inoperable.
- Back-ups of sensitive, critical, and valuable information must be stored in an access-controlled site.

➤ **Business Continuity Planning**

- Business Head /IT is responsible for business continuity planning for IT systems. The business continuity plan must be fully documented, maintained and tested on a regular basis.

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- IT must take daily backups of all the main servers. These backups must be stored off-site for ease of access or should the computer room become inaccessible. The media should be tested for recovery purposes on a regular basis.

17.17. Distribution of the Policy:

The IT Security Policy is an internal document and is meant for internal usage within the company. Duplication and distribution of this policy without an authorized release is prohibited. The HEAD TECH TEAM will decide on the number of copies that will be in circulation and the persons with whom the document will be available.

Every person in custody of the document has the responsibility for ensuring its usage limited to “within the organization”. The custodian of the document will also ensure that the document is continually updated with amendments that may be issued from time to time. Any loss or mutilation of the document must be reported promptly to HEAD – TECH TEAM.





Employment Separation Process

Policy History Details	Existing Policy	
Original Issue Date	Apr 2017	
Revision Date	Apr 2017	Revision No:
Revised by	Corporate HR	
Issue Date	Apr 2017	
Effective Date	Apr 2017	
Issued By:	Corporate HR Team	

18. Employee Separation Process

18.1 Separation occurs whenever an employee leaves the services of the company for any of the following reasons:

- On reaching the superannuation age of 58 years as per terms specified in the letter of appointment.
- Resignation.
- Death while in service.
- Abandonment of service.

Conditions

- An employee who wishes to resign from the services of the company will be required to give the notice of resignation as per terms of appointment or subsequent amendment in any.
- An employee during the probation period can be relieved with three days' notice period.
- Shortfall in notice won't be adjusted against Privilege leave balance. However, the same can be adjusted against his/her dues if any or otherwise they may have to remit the amount before relieving the service.
- Employees who are on notice of resignation will not generally be allowed to go on leave during the notice period.
- In case of termination of service on account of misconduct, the company will not be liable to give notice or pay in lieu thereof.
- Employee has to obtain Clearance Certificate from all concerned (Form No. 17) and submit the same to HR Department through their HOD. Based on the Clearance Certificate HR Department will advise Accounts Department to initiate the Full and Final settlement.

18.2 Exit Interview:

- In all cases of resignation, a formal Exit interview in the prescribed format (Form No. 18) will be carried out by a committee consisting of concerned Branch Head/Location Head/ and concerned Department Head (where employee is working).
- Abandonment of Service: In case of an employee proceeds on leave without approval of the competent authority. The employee will be marked absence from the duty and treated as unauthorized absence. If such absence exceeds 8 consecutive days, the

management may initiate suitable disciplinary action against such employees. Unauthorized absence is treated as serious misconduct.

