



BACKGROUND VERIFICATION POLICY

Version 3.1

June - 2023



Table of Contents

I. DISTRIBUTION LIST.....	4
II. VERSION HISTORY	4
III. EFFECTIVE DATE.....	4
IV. ABBREVIATIONS	5
V. DEFINITIONS.....	5
VI. OBJECTIVE.....	5
VII. SCOPE	6
VIII. BGV PROCESS & CHECKS.....	6
IX. BGV OUTCOME AND REPORTING.....	8
X. TURN AROUND TIME.....	8
XI. NON-GREEN REPORTS OF BGV SUBJECTS.....	9
XII. MANAGEMENT RIGHTS.....	10

Background Verification Policy	
Version No.	3.1
Process owner	HRSS BGV team
Last Review Date	16-May-2023

First release:

Date: 04 Sep 2020	Prepared By	Background Verification Team (Charulatha S & Preetham Avanthkar)
Date: 04 Nov 2020	Reviewed By	India Legal Team (Archana Gupta & Sharwari Deshpande) India HRSS (Sweta Bharatiya & Renu Sharma)
Date: 19-Nov 2020 02-Dec-2020	Approved By	India - CHRO & Regional General Counsel (Pallavi Tyagi & Bharat Mehta)

Second release:

Date: 04 Feb 2022	Prepared by	Background Verification Team (Manjunatha BV, Deepak Patel & Sandra Remedios)
Date: 08 Feb 2022	Reviewed & approved by	India HRSS Leader (Arunkumar Gopalakrishnan)
Date: 15 Feb 2022	Reviewed & approved by	India Legal Team (Archana Gupta & Abhishek Anand)
Date: 08 Feb 2022	Approved by	India - CHRO & Regional General Counsel (Aarti Srivastava)

Third release:

Date: 04 May 2023	Prepared by	Background Verification Team (Prema Chennakeswaran & Deepak Patel)
Date: 16 May 2023	Reviewed by	India HRSS Function Leader (Vimal Raj B)
Date: June 2023	Approved by	India HRSS Head (Arunkumar Gopalakrishnan)



I. Distribution List

Issued to employees within Capgemini (including its subsidiaries and affiliates) in India (collectively referred to as “Capgemini” solely for the purposes of this document).

II. Version History

Version	Date	Description	Updated By
1.0	01-Oct-2016	Harmonized Background Verification Process document	Background Verification Team
1.1	02-Jun-2017	Address check limited to client specific requirement	Background Verification Team
1.2	22-Aug-2017	Review of Annexure 3	Background Verification Team
2.0	01-Jan-2021	Revamp of Background Verification Policy	Background Verification Team
2.1	03-Jan-2022	Process owner name change	Background Verification Team
3.0	21 Feb 2022	Revised Standard BGV checks & non-Green process	Background Verification Team
3.0	10 Oct 2022	Review of the Background Verification Policy	Background Verification Team
3.1	4 May 2023	Non green process update, Abscondee process integration with BGV & Defining responsibilities for Central and BU HR teams on adjudication decisions.	Background Verification Team

III. Effective date

This policy document is a formalization of the existing and ongoing Capgemini process and practice pertaining to Background Verification and is published for general information of the employees.



IV. Abbreviations

BGV	Background Verification
BU	Business Unit
BU HR	Business Unit Human Resource Partner
BU HR Head	Business Unit Human Resource Head
DOJ	Date of Joining
P emp	Current employer/Company prior to Capgemini
P-1 or P-2 or P-3 or P-4	Last employers or companies prior to “P” company in chronology
ABL	Application Business Line
GBL	Global Business Line
IRF	Information Release Form

V. Definitions

- “Agency” refers to the external service provider engaged for the purpose of conducting BGV. All BGVs will be conducted by the Agency as per the agreed terms and conditions with the Company
- “Candidates” are individuals who may be potential hires to Capgemini
- “Employees” are individuals who have been employed with Capgemini by virtue of an employment agreement/Offer Letter
- “BGV Subjects” shall collectively refer to ‘Candidates’ and ‘Employees’
- “BGV Checks” refers to the background checks that Capgemini as an organization will conduct for Candidates and Employees
- “Employment Agreement” refers to the terms and conditions of employment as amended from time to time

VI. Objective

The objective of this document is to communicate standardized guidelines and end-to-end processes relating to BGV carried out by Capgemini as per its business & client requirements.



VII. Scope

As a standard practice the BGV process for candidates is initiated prior to joining Capgemini, except for Previous (P) company checks and or client specific check which may be done for candidates post joining Capgemini.

BGV Checks will be done as below: -

- Each candidate is required to undergo BGV checks post issuance of the Employment Agreement
- During the employment employee's BGV check may also be done as per client requirement or as felt necessary from time-to-time

Exceptions:

BGV may generally not be applicable unless sought specifically for a client or as per business requirement for the below:

- Intern's / Trainee's
- Subcon
- Seconded/ Assignees (deputed in India from Capgemini group entity)
- Rebadged on account of acquisition (depending on the acquisition terms and availability of past BGV reports)
- Intra-Company or International Transfers: Standard BGV is not applicable when Employees are transferred within Group Company (within India or outside) unless felt necessary or as per the client requirements.

VIII. BGV Process & Checks

The BGV process starts once the Employment offer is released to the candidate and provides complete documentation as stipulated to initiate the Standard Background Checks. The documents can be submitted by the candidates through BGV application. The candidates need to ensure submission of all BGV document without insufficiencies/discrepancies. Additional documentation may be requested by the company to support the completion of these checks as may be required.

Specific checks as required may be initiated upon the candidate joining Capgemini (in a few cases prior to joining).

- The company conducts background checks through its empanelled vendors on the candidates that have accepted the employment agreement (Offer Letter), submitting the IRF permitting the Company to share the necessary information for such BGV checks with the Agency
- Capgemini conducts two types of Background Verification as below:



Standard Background Checks:

All BGV Subjects are required to undergo the mandatory standard BGV checks as mentioned below:

Type of Check	Checks	Documents required
Education	Highest completed education	Degree certificate and Final Year mark sheet and/ or all semester marksheet or provisional certificate
Employment	Last 05 years of Employment	Previous (P) Employment: Resignation Acceptance and /or Relieving / Experience letter which clearly captures the employee ID, start and end date of employment Prior (P-1, 2, 3) Employment: Experience and Relieving letter which clearly captures the employee ID, start and end date of employment
Database Check	India and Global Specific	Database Form & ID proof
Court Record (Applicable only for FS)	Last 07 years of Addresses including Permanent Address	Court Record Form & ID proof

Note:

- BGV Subjects to submit duly completed background verification form and resume which will be validated
- Lateral: In case the Previous company relieving letter and / or experience letter is not submitted at the time of joining, the Employee shall sign an undertaking to submit it within 45 days from the DOJ as mentioned in the Employment Agreement
- Campus/Fresher: In case of any of the mandatory education documents is not submitted at the time of joining, the Employee shall sign an undertaking to submit it within 60 days from the DOJ as mentioned in the Employment Agreement

Client Specific Checks:

Some of Capgemini's clients may require additional verifications for Employees as per the terms agreed with the Company. An indicative list (subject to change without notice) of these verifications is provided below:



- Identity Verification
- Address Verification
- Employment Checks (in addition to standard checks)
- Criminal verification through Court Records or Police Reference Verification
- Contraband Test: Contraband substance use test can be done either through blood/urine/ hair follicle sample. Different panels can be selected based on the requirement (Example: 3 panel/ 5 panel/ 7 panel/ 9 panel/ 10 panel)
- Educational or Employment gap verification
- FACIS Level 3
- Driver's license check/ MVR- Motor vehicle registration check
- Credit Check

IX. BGV Outcome and reporting

Post completion of BGV, the outcome of the same is categorized based on the discrepancy of the verification/documents. The BGV outcome is categorized in below mentioned coding and the BGV subjects are expected to satisfy the discrepancy/document insufficiency within the stipulated time failing which the Company is at liberty to take appropriate action as per this policy.

COLOUR CODE	COLOUR CODE STATUS
GREEN	Clear Report
NON -GREEN (RED & AMBER)	Discrepancy/Document insufficiency

X. Turn Around Time

The BGV Checks are usually completed within the agreed Turnaround Time (TAT) as detailed below:

Type of Check	All Grades
Standard Background Checks	21 Business days (including immediate previous employment) *

Additional Client Specific Checks	Phase 1 online checks (CIBIL, Court record check, Database check & ID check): 6 Business Days
	Phase 1 with external dependency checks (Contraband test, address check etc.): 10 Business Days
	Phase 2: 21 Business days

**TAT is calculated from the time insufficiency is cleared*

XI. Non-Green Reports of BGV Subjects

The Employee with Non-Green BGV outcome will be provided opportunities to clear discrepancy/insufficiencies as per the below table. In the event even after expiry of the time, provided BGV status continues to be Non-Green, then the actions as stipulated in the table shall be taken without further notice

Steps	BGV status Non-Green	Process to be followed
Step 1 Day-0	Non-Green Report due to Insufficiency /Discrepancy in Documents*	1st Email to Employee seeking for requisite document/details within 5 working days from the date of the email.
Step 2 Day-5	No Response / unable to provide documents after Step-1*	Show Cause Notice to be sent (on end of 5 working days period as granted under Step-1) calling upon the employee to show cause as why action should not be taken.
Step 3 Day-10	No Response / unable to provide documents after Step-2	Initiate separation** of employment

*If the document/details is shared by the candidate/employee, re-verification will be initiated

**Considering BGV clearance is a pre-requisite for employment confirmation, we may call it separation / Cessation by revoking the employment offer as per relevant clause in the employment offer. As BGV successful completion is conditional clause /contingent clause in employment offer, it will also address the concerns related to re-instatement plea by any employee if the matter goes litigious.



Depending upon case-to-case basis there can be exception to this process. For this HR needs to create a documented deviation process. Requisite approval mechanism to be built in for such exceptional approvals.

Note:

- In the event Employee resigns from the employment pursuant to Non-Green report, the relieving from the services of Capgemini will be subject to conclusion of BGV investigation process and till such time relieving letter will not be issued
- If an Employee's BGV outcome is Non-Green and the Employee absents without intimation/authorization, then proceedings under BGV will continue. [Unauthorized absenteeism \(abscondee process\) will be initiated by BU. Upon confirmation of an absconding associate from the BU, the BGV will be halted and closed as 'Non-Green'](#)
- As deemed necessary by the Company and or as per the business requirements, an Employee can be subject to BGV checks anytime during their employment
- It is the primary responsibility of the BGV Subject to fulfil the discrepancy/document insufficiency that is notified in the BGV outcome failing which as employment is subject to termination.
- [Misrepresentation of facts confessed by the Employee- Get Employee acceptance/confession letter and share with to BU HR for consequence management](#)
- BU HR to ensure confession provided by employee is as per the legal suggested guidelines
- Confession letter/mail along with relevant [artefacts](#) to be shared with Central HR Team for review
- Central HR team to evaluate confession letter/email and provide the approval [to BUHR](#) on case-to-case basis for further action. [BGV team to be kept informed on consequence management](#)
- BU HR to action as per the recommendation received from Central HR Team. [BGV team to be kept informed on consequence management.](#)
- Contested by the Employee - below steps to be followed
 - a. BGV Team to ensure to share the case details along with the BGV head approval to Central HR Team to initiate DC (Disciplinary committee)
 - b. Central HR team to evaluate and share the final outcome with BGV team



XII. Management Rights

Capgemini reserves the right to amend this policy from time to time, without prior notice.

---END---