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1.0 ABOUT THE MANUAL

- The Human Resource Policy Manual is the central reference for all Human Resource policies within the Organization. It contains detailed Human resource systems, policies and procedure, and is applicable to entities across DCICL, both corporate as well as all branches.
- Each policy is a guideline to be approached in the spirit of which the policy is written.
- The manual not only outlines DCICL Human resource policy towards the various phases of the employer-employee relationship, but also provide the processes and methodologies for systematic administration. Every Manager and Supervisors should be able to use this manual as a guidebook when he or she needs to apply policy in any given situation. The manual eliminates the need for personal decisions regarding key policies, protects the rights of all employees and assures uniformity of action Human Resources throughout all divisions.
- The responsibility for the consistent and impartial administration of the policies outlines here lie with the Human Resource department of every business division, as well as with all members of the management team.

1.01 SCOPE

- The purpose of this policy document is to set out guidelines designed to assist all DCICL staff undertake their operational responsibilities without impediment or conflict.
- All HR policies defined here are competency-based with the exception of few employees in areas related to Compensation and Rewards. The Common sets of competencies that have been identified are to be used across the Organization. However, different applicability levels are allocated to different roles/levels/positions, as applicable.

1.02 DISTRIBUTION OF THE MANUAL

- Every employee has the right to access the information within this manual. Each division Head will be issued a copy of this manual and shall be responsible for its safekeeping and maintenance. The manual must remain on the premises and in the department at all times. Executives who transfer within the Organization must transfer the policy manual to their replacement or return it to the HR department.

- It is the responsibility of the HR department to update the Policy Manual and to ensure that it contains complete and accurate policies. It is the responsibility of each employee to be familiar with the information contained in the policy manual as well as any amendments thereto. Should any employee have any questions concerning the intent or procedure in this HR policy Manual, he/she should also see his/her immediate superior or divisional HR Official.

1.03 AUTHORITY FOR HUMAN RESOURCE POLICY

- The policies contained in this manual have been jointly approved by Management and Human Resource Department. This manual is hereby established as the official policy document for the Company.

1.04 ESTABLISHING NEW OR REVISED POLICIES

- The systems, policies and procedures in this manual will remain in effect until changes are deemed necessary. However, proposed, changes will be made only after due consideration is given to the mutual advantages, benefits and responsibilities of such changes on employees and the Organization.
- When there is an apparent need for a new or revised policy, the Human Resource Department will submit the revision to the Board for approval. Timely notification will follow, should such changes be warranted and approved.

1.05 MANAGEMENT'S RIGHTS

This manual describes general human resources policies and procedures. The manual should not be construed as, and does not constitute, an offer of employment for any specific duration, nor is it intended to state any terms of employment. Management reserves the right to change, modify, suspend, interpret or cancel its policies and practices at its sole discretion and without advance notice. This right extends to both published and unpublished policies.

2.0 ABOUT THE COMPANY – SNAP SHOT

DC INFOTECH & COMMUNICATION LTD.

- Started in 1998, as DC Infotech a Partnership Concern
- Company became Limited in 2019.
- Leading distributors in Networking, Enterprise IT Infrastructure, Digital Signage and Security.
- Corporate & Registered Office is located in Unit No. 2, Aristocrate, Lajya Compound, Mogra Road, Andheri East, Mumbai 400069
- Brands working with us includes: Aten, Cisco, D Link, Netgear, Ncomputing, Samsung, Sonicwall etc.

2.01 MISSION

- Make DC the Employer of Choice.
- To provide the best value proposition to our vendors and partners through efficiency and responsiveness.
- To be Quality Driven and Process Oriented.
- Consistent Performance with profitable growth.

VISION

- To be the most valued technology distribution partner in digital transformation space.

VALUES

- Integrity
- Teamwork
- Ownership
- Passion

2.02. HUMAN RESOURCE VISION, MISSION & STRATEGIC GOALS

VISION:

To be the business partners through

- Aggressively implementing strategic role in delivering and developing the Organization.
- Becoming a professional HR department by moving beyond “paper pushing” to making value added business contribution.

- We shall strive to accomplish our vision through:
 - Leveraging technology
 - Alignment of HR systems
 - Development of HR staff
 - Partnering with all departments

MISSION:

- Human Resources foster partnership to attract, develop, and retain a highly qualified, diverse, workforce and create a culture that promotes excellence throughout the Organization.
- Align acquiring the best management and compensation philosophy to attract & retain the most qualified employees.
- Maintain a current total compensation and classification process to effectively attract and retain employees. Evaluate and address employee retention issues.

2.03 HUMAN RESOURCE MANAGEMENT PRINCIPLES

- **Administer HR policy, procedure and programs in order to align personnel law and organizational policies with continuous improvement.**
 - Develop and /revise HR policies and procedure.
 - Communicate new and / or changed HR policies and procedures.
 - Implement and improve technical capability to ensure the most effective processes.
- **Organization Structure and Manning:** DCICL Organizational structure will be lean, with a minimum number of levels and with clear individual reporting and accountability.
- **Recruitment and Selection:** At every level of the Organization, we will select people of the highest quality and with the highest potential to advance our business.
- **Performance Management:** Our Performance Management System will include a culture of personal growth and organizational excellence. Performance-based results will be the cornerstone of this system.
- **Learning & Development:** We will foster world-class managerial and technical excellence using continuous learning, development tools and methodologies to support our business and encourage growth from within.
- **Career Development:** We will provide careers, not merely jobs to our people. We will assist our people to develop in a balance manner, such that organizational needs and personal achievement find equal importance.

- **Succession Planning:** Our focus on development of people will reflect our international character. This entails ensuring that we have the right number of employees with the appropriate skills in the right place at the right time.
- **Transfers:** Transfers, national and international, will be based on organizational needs and career development requirement of the individual.
- **Compensation:** Our compensation philosophy will enable us to recruit and retain the best and the most highly motivated talent available in the market. It will encourage the highest level of performance amongst our employees through result based reward and recognition. Compensation will be linked to individual, department and company performance.
- **Employee Relations:** We will create and preserve an open and harmonious environment in which employees at all levels will strive to deliver world-class service at the highest level of productivity.
- **Retention:** Retention of talents is a key management responsibility, as is decisive action regarding those whose performance is consistently below par or those who breach accepted ethical standards and rules of conduct.
- **Adherence to applicable law:** We will adhere to all the relevant and applicable laws.

3.0 RECRUITMENT & SELECTION POLICY

The recruitment and selection policy has following aims and objectives:

- To ensure that all appointments are made on merit.
- To attract sufficient applications from potential candidates for appointment with the skills, qualities, abilities, experience and competencies deemed as being necessary to the job.
- To base selection decisions and criteria directly on the demands and requirement of the job and the competencies identified as necessary for satisfactory performance.
- To ensure that all employees involved in the recruitment and selection process are properly trained in order that the objectives of the policy are met.
- To create a strong Employer Branding to attract the best talents available in the industry.

- Any recruitment across the organisation, at any level/ function has to be approved by the concerned authorities as specified in the matrix below:

GRADES	ROLES/DESIGNATION	INTERVIEWING AUTHORITY	
		Preliminary	Final
M1	GM / VP / National Manager / Business Head	CFO/Director/ HR	CMD/HR
M2	DGM / AGM / Zonal Manager /Regional Manager / Chief Manager / Business Manager	NM/BH/ CFO/ HR	CMD/ Director / CFO / HR
M3	Sr. Manager / Manager	NM/ BH/HR	CMD/ Director / CFO/HR
M4	Deputy Manager / Assistant Manager / Area Manager / Senior Executive	NM / BH / HR	Director/AGM Finance /NM / HR
M5	Sr. Executive / Executive / Jr. Executive	Functional Head / HR	Functional Head / NM/BH/HR

- Candidates attending interviews from outstations will be reimbursed as per their levels mentioned below:

POSITION	REIMBURSEMENT
Sr. Mgr. / Business Mgr. / Product Mgr. / Branch Mgr. / Dy. Manager / ASM / Associate Mgr. / TL / Sr. / Jr. / Executive	3rd AC Rail fare or ordinary bus fare from the nearest place of residence to destination.
DGM / AGM / General Manager / Vice President / Sr. Vice President	2nd AC or deluxe bus fare from the nearest place of residence to destination.
President & Above	2nd AC or Economy Air Fare from the nearest place of residence to destination.

- Local conveyance will be decided depending on the site and mode of transportation.
- Air Fare only permissible in cases of President and above and need to be approved by Chairman & Managing Director.
- Official / Company related confidential information is not be parted with the candidates called for the interview.
- For Hiring Purposes, a candidate compulsorily needs to have completed minimum 18 Years of age during the time of job application. In case the candidate is below the required age, his / her candidature will be cancelled and the same will be conveyed to the candidate.

3.01 INTERNAL JOB POSTING POLICY

Purpose: The purpose of this policy is to foster a work place where qualified employees are encouraged to seek various career opportunities within the organization, gain valuable work experience, enhance their competencies and increase job satisfaction.

Eligibility: All full time confirmed employees of DC Infotech & Communication Ltd. and who have a satisfactory performance are eligible to apply for open positions.

Responsibility: Immediate Managers, Human Resource Function to assist in implementation and provide administrative support.

Exception: Any exception to the guidelines need the approval of the Functional Head / Human Resource / Directors.

While it is the philosophy to promote from within wherever possible, there are business conditions that could cause a position to be filled without posting or to post the position while simultaneously recruiting from the outside.

Guidelines:

- **Method of Posting:** Job Openings will be posted from the HR mail ID to all employees in DC Infotech & Communication Ltd.
- **Posting Information:** Each Job Posting will have Job title, Department, Job Description, Location.

- **Application Procedure:**

Employees who have the required eligibility and qualification should complete the internal job application form

- Submit the internal job application form to HR and HR in turn consult his / her reporting manager for approval.
- The completed and approved internal job application form in line with HOD approval will be conveyed to the employee.
- Candidate should mark a copy to HR when he /she is forwarding the resume to Reporting manager.

- **Screening and Interview:**

- HR will review each application which will also include a discussion with the employee's supervisor.
 - HR will, if appropriate, interview candidates and discuss their qualification and interest for the position / job. Any employee lacking the qualifications for the job / position will be notified immediately.
 - Qualified candidates will be interviewed and managers may request to review their original employment application and the recent performance appraisal of the internal candidate.
 - Shortlisting and selection process is the discretion of Management.
 - If selected, the departments (existing and new) along with HR will work out a suitable joining time.
 - All are requested to keep the information and application confidential till organization makes a formal announcement.
- **Notification of candidature:** All internal candidates interviewed will be notified of their candidature by Human Resource. The employee can choose to accept or decline the offer without repercussions in their current positions.

- **Payroll changes:**

- Pay changes will be consistent with the salary guidelines of DC Infotech & Communication Ltd.

- The salary fitment for the position will be determined based on the qualifications, and experience for the new position and internal equity within the new department.

3.02 TALENT REFERENCE POLICY

The purpose of this policy is to recognize and reward employee's contribution in attracting new associates to the organization.

This policy is applicable for full time positions only for people coming on DCICL's Payrolls.

For every joining through referral, the associate referring the candidate is eligible for the following benefit.

Referral Category	Referral Bonus
DGM / AGM / Zonal Manager / Regional Manager / Chief Manager / Business Manager	INR 10,000/-
Sr. Manager / Manager	INR 5,000/--
Dy. Manager / Assistant Manager / Area Manager / Sr. Executive	INR 3,000/-
Sr. Executive / Executive / Jr. Executive	INR 2,000/-

Who can participate in our employee referral program?

All employees are eligible to participate in our referral program except for:

- Senior management (Chairman & Managing Director, CFO, Directors, National Sales Head & Product Head)
- Human Resource Managers.

Bonus Terms:

- Associate from any location can refer candidates.
- The bonus shall be paid to the associate subject to the condition that the referred candidate works for the company for a minimum period of **three months** and should have gone through a normal relieving process.
- No referral bonuses are paid for referral of relatives of employees.
- The referee should be on the rolls of the company at the time of disbursement of the bonus.

- There is no cap on the number of referrals an employee can make. All rewards will be paid accordingly.
- Referral payment processing will happen along with the payroll processing of the month after **three months** of joining of the referral.
- In case the referred profile is already available with DCICL's recruitment database, it shall not be considered as a successful referral.
- Associates will be informed through e-mail within 10 days of referring a successful profile.
- If duplicate referrals occur, the first referral received through e-mail (based on the date of submission of resume) will be eligible for reward.
- All associates referral payouts are taxable as per the prevailing tax rates. Tax will be deducted as per the prevailing laws and balance will be paid.

3.03 APPOINTMENT

- All the appointment letters need to be signed by Human Resources only.
- The application form contains a section where in the prospective employees are required to furnish names and addresses of two references.
- All offers made to the candidate should be as per given guidelines, and based on the sanctioned amount. The amount for each position needs to be sanctioned at the time of building the HR budget.
- False information provided by an employee, may result in withdrawal of the employment.
- The conditional offer letter will have the clause of reference checking, which is done only after the candidate accepting the offer. A reference checking will be done by the HR department with the candidates existing employer after the candidate resigning from his/her current employer.
- The conditional offer of employment should contain the list of documents the selected candidates has to carry as part of joining formality in event of accepting the offer.
- The Company has standardized letters to be sent for verification with the reference provided by the candidates.
- The HR department will inform the candidate while issuing the offer letter to submit the following documents. Appointment letter will be issued only if all the below mentioned documents are submitted to HR.
 - Educational certificates
 - Relieving letter from the past employer
 - Salary certificate
 - Experience Certificate
 - Soft copy & hard copy passport size photograph.

3.04 AFTER JOINING

- The joining formalities have to be duly completed by the HR department and **unless all the documents related to the personnel files** are submitted only then will the Appointment letter be issued.
- The new employee will be given a job profile / KRA / Goal Sheet by concerned HOD, which includes the assignment he is going to handle. His immediate superior will also inform the new employee about the roles and responsibility.
- A written communication, will reach all the Departments and Branch offices.
- The Concerned employees will be taken to other department by the HR department for an introduction.
- The induction schedule for two days will be worked out wherein the person will get orientation of each department so that he gets accustomed to the system, procedure and policies of the company. In the process of orientation the employees will establish a rapport and feeling of belongingness.
- HR will be the Authorised Signatory for signing Appointment Letters. However in case of Appointments which are above the current grade of HR Head, it needs to be signed by either CMD or the Director.
- All employees will be granted confirmation after **six months** from the date of joining. During this probation period, the Company reserves the right to terminate the services of an employee without notice. However, the employee is bound to give notice period of **one week** for resignation even in his/her probation period. The six months may be extended at the discretion of the management. On completion of probation period, the employee will be issued a letter of confirmation in writing by the HR.
- We emphasis the creation of a culture wherein person joins the organisation and happily retires from the same.

4.0 RULES, PROCEDURE & DISCIPLINE (CODE OF CONDUCT)

4.01 WORK HOURS & PUBLIC HOLIDAYS

- The office working hours are from 10.00 a.m. to 7.00 p.m. with lunch break between 1.30 p.m. to 2.00 p.m. from Monday to Saturday.
- There will be 2 tea breaks, where tea will be served.
- 8 Public holidays are declared at the beginning of every calendar year.

4.02 ATTENDANCE

- Employees are required to report their attendance on the muster kept (with respective branch employees) at reception and also to punch your finger on the biometric machine (for offices where biometric machine is installed) as soon as they enter the office premises. Employees are required to report on duty at 10.00 a.m. sharp.
- Late reporting to work beyond 12.00 p.m. and leaving the office before 5.00 p.m. will be deemed as a half day. However an employee must work for minimum 5:00 hours in case of a half day.
- All unit levels, the working hours will be fixed in consultation with the Head units and considering the local situation.

4.03 BUSINESS ENVIRONMENT

In this section you should tailor the information based on the general customs and practices of your business.

- **Work Areas**

As many employees work in an open plan area, it is important that your workstation and or desk remains clean and tidy and free of boxes, papers and magazines. Our expectation is that your workstation will be cleared and tidied at the end of every day. Any items that require storage should be put away, hard copy paper files should be kept to a minimum, with soft copies of files stored on the relevant shared drive electronically. Laptops should not be left on desks overnight unless you have your own lockable office.

- **Security**

Entry to the DCICL premises during and / or outside of normal business hours will be by way of biometrics.

Employees must ensure that all confidential/sensitive documents are locked away at night. You should make sure that your personal belongings and valuables are locked away and secured. Personal property is not covered by Company insurance.

- **Pantry and Washrooms**

Please keep the kitchen and pantry area clean at all times, cleaning up after use. You should be mindful that these are public areas and you should be respectful to others by always cleaning up after yourself. If you use dishes then wash them immediately after use.

If there are any issues with these facilities you should notify your receptionist immediately.

- **Meeting rooms**

If you need to book or use a meeting room please ensure that you book through the receptionist. Please tidy up after meetings, take away your cups, files papers etc. Place chairs back in position and clean all work away with the help of housekeeping.

- **Printing**

Save costs on printing wherever possible by printing on both sides of paper. Please pick up all printed matter off the printer and ensure that the printer is stocked with paper at all times. Color printing should be kept to a minimum.

- **The noise factor**

Try to avoid shouting at each other across the office or on site at a client and respect people's busy periods or meeting times. Or if someone is engrossed in something at their computer or there are more than two people meeting with someone, it usually means they are busy. Try to talk quietly when you are on the telephone and respect others around you.

4.04 IT, INTERNET & EMAIL POLICY

- **Internet Use**

The internet is provided by the Company for business use. Limited private use is permitted if the private use does not interfere with a person's work and that inappropriate sites are not accessed e.g. pornographic, gambling, etc. Management has the right to access the system to check if private use is excessive or inappropriate.

Failure to comply with these instructions is an offence and will be subject to appropriate investigation. In serious cases, the penalty for an offence, or repetition of an offence, may include dismissal. Staff need to be aware that some forms of internet conduct may lead to criminal prosecution.

- **Email Use**

1. Email facilities are provided for formal business correspondence.
2. Take care to maintain the confidentiality of sensitive information. If emails need to be preserved, they should be backed up and stored offsite.
3. Limited private use of email is allowed if it doesn't interfere with or distract from an employee's work. However, management has the right to access incoming and outgoing email messages to check if an employee's usage or involvement is excessive or inappropriate.
4. Non-essential email, including personal messages, should be deleted regularly from the 'Sent Items', 'Inbox' and 'Deleted Items' folders to avoid congestion.

To protect the Company from the potential effects of the misuse and abuse of email, the following instructions are for all users:

1. No material is to be sent as email that is defamatory, in breach of copyright or business confidentiality, or prejudicial to the good standing of Company in the community or to its relationship with staff, customers, suppliers and any other person or business with whom it has a relationship.
2. Email must not contain material that amounts to gossip about colleagues or that could be offensive, demeaning, persistently irritating, threatening, discriminatory, involves the harassment of others or concerns personal relationships.
3. The email records of other persons are not to be accessed except by management (or persons authorised by management) ensuring compliance with this policy, or by authorised staff who have been requested to attend to a fault, upgrade or similar situation. Access in each case will be limited to the minimum needed for the task.
4. When using email a person must not pretend to be another person or use another person's computer without permission.
5. Excessive private use, including **mass mailing**, "**reply to all**" etc. that are not part of the person's duties, is not permitted.

6. Failure to comply with these instructions is a performance improvement offence and will be investigated. In serious cases, the penalty for breach of policy, or repetition of an offence, may include dismissal.

This policy also applies to all employees, contractors and sub-contractors of DCICL who: have an active profile on a social or business networking site such as LinkedIn, Facebook or Twitter; write or maintain a personal or business' blog.

4.05 DRESS CODE /PERSONAL APPEARANCE

- You are expected to dress and groom yourself in accordance with accepted social and business standards, particularly when your job involves dealing with customers or visitors or person.
- As a general guideline, all male employees should wear formal trousers, striped/plain full sleeved shirts in sober colours and formal leather shoes in all the seasons and all female employees should wear sari's/salwar kameez/ western formals or any other suitable formal office attire. On all Saturdays the employees are allowed to wear smart casuals.
- A neat, tasteful appearance contributes to the positive impression you make on our clients. You are expected to be suitably attired and groomed during working hours or when representing the Company. A good clean appearance boosts your own poise and self-confidence and greatly enhances our Company image. When working at a customer's site please observe what the customer is wearing and dress appropriately.
- Personal appearance should be a matter of concern for each employee. If your Manager/HR feels your attire is out of place, you may be asked to leave your work place until you are properly dressed. You will not be paid for the time you are off the job for this purpose. Your Manager/HR has the sole authorization to determine an appropriate dress code, and anyone who violates this standard will be subject to appropriate disciplinary action.

4.06 ORGANISATION HIERARCHY

- We believe in an organisation structure and that is as flat as possible, which is why there are minimal levels between the top management and the junior most level. As an employee you belong to one of the following classifications:

DESIGNATION	GRADE	CADRE
Chairman / Managing Director/ CEO / Director / CFO	M-1	TOP MANAGEMENT CADRE
GM / VP / National Manager / Business Head	M-2	MIDDLE MANAGEMENT CADRE
DGM / AGM / Zonal Manager / Regional Manager / Chief Manager / Business Manager	M-3	
Sr. Manager / Manager	M-4	
Dy. Manager / Assistant Manager / Area Manager	M-5	JUNIOR MANAGEMENT CADRE
Sr. Executive / Executive / Jr. Executive	M-6	

- The reference Employees in the manual, means reference to all the above categories.

4.07 SALARY AND CONVEYANCE

- It is our policy to pay salaries which are competitive and performance oriented. You will be kept informed of your basic pay and other allowances. Your salary is reviewed in the beginning of every financial year based on your job performance.
- Salaries are paid in the **1st week** of every month.
- Excluding month end the Company will reimburse expenses incurred towards conveyance / refreshments / lunch / dinner while working late (**after 9:30 PM**), on outside duty (sales employees) on working late on working days and working on holidays as per the following limits.

CONVEYANCE

Reimbursement at actual

4.08 CONFIDENTIAL INFORMATION

- Our client entrust us with important information relating to their business. The nature of this relationship requires maintenance and confidentiality. As an employee, you will have access to and knowledge of information proprietary to the DCICL group. Each employee must undertake not to reveal, copy, disseminate or otherwise compromise the confidential nature of the information. Your employment with the group assumes an obligation to maintain confidentiality, even after you leave your employment.
- Any violation of confidentiality seriously injures the group's reputation and effectiveness. Therefore, please do not discuss the group's business with anyone who does not work for us, and never discuss business transactions with anyone who does not have a direct association with the transaction.
- No one is permitted to remove or make copies of any records, reports or documents of the Group without prior approval from management.

4.09 ABSENCE OR TARDINESS

- The Group is aware that emergencies, illness, or pressing personal business that cannot be scheduled outside your office hours may arise. If you are unable to report to work, or if you arrive late, please contact your Manager & HR immediately. Give him or her as much time as possible to arrange for someone else to cover your position until you arrive. If you know in advance that you will need to be absent, you are required to request this time off directly from your manager. He or she will determine when it will be the most suitable time for you to be absent from your work.
- When you call in to inform of an unexpected absence or late arrival, ask for your superior directly and inform the HR via **email only**. For late arrivals, please indicate when you expect to arrive for work. Notifying the receptionist or another employee is not sufficient. If you are unable to call in yourself because of an illness, emergency or for some other reason, be sure to have someone call on your behalf. If your manager is not available when you call you may leave the information with another manager.
- Please be aware that **excessive absenteeism, lateness or leaving early** may lead to disciplinary action.

4.10 OUTSIDE ACTIVITIES/ JOB

No employee may take an outside job, either for pay or as a donation of his or her personal time, with a customer, supplier or competitor of the Group; nor may they do work on their own if it competes in any way with the sales of products or services we provide. If your financial situation requires you to hold a second job, or if you intend to engage in a business enterprise of your own, the prior written approval of the Group must be obtained.

4.11 PERSONAL PHONE CALLS

You are required to keep your personal phone calls to a minimum during office hours. They must not interfere with your work. You should not use the group's phone to make outstation calls for personal purpose except in emergency situation. In any case you should inform the office administrator of the use so that he/she can make appropriate deduction from your payroll.

4.12 TOBACCO, ALCOHOL, SMOKING, PSYCHOTROPIC DRUGS

Smoking & Consumption of tobacco, alcohol or Psychotropic drugs in any of the premises is **strictly prohibited**. DCICL Group policy dictates that employees must refrain from consuming alcoholic beverages / psychotropic drugs during working hours while on duty inside the office premises has a non-smoking policy.

4.13 OUT DOOR DUTY

- Every employee is expected to inform the Outdoor duty to HR Department via email only. In case the outdoor visit is scheduled directly from the residence, you need to take **prior approval** from your **HOD via email marking the CC to the HR Department**. All employees have to intimate to the HR department in writing when they go on tour. Incase if the HR department has no **valid email records** then it will considered as **leave without pay**.
- When working in an international context or travelling internationally on behalf of organisation he/she will observe all local laws and be sensitive to local customs.

4.14 INVOLVEMENT IN CRIMINAL ACTIVITIES THAT CONTRAVENE HUMAN RIGHTS OR THOSE THAT COMPROMISE THE WORK OF THE ORGANISATION

The employee will not contribute any forms of illegal activities. He/she will notify to the organization of any unspent criminal convictions or charges prior or during his/her employment.

4.15 HARASSMENT DISCRIMINATION, PHYSICAL OR VERBAL ABUSE, INTIMIDATION OR EXPLOITATION

The Company believe and fully abide to the equal opportunities, diversity and anti-harassment policies. Employees are also required to adhere the same and never engage him / her in any exploitative, abusive and corrupt relationship.

5.0 LEAVE POLICY

Objective: To extend the facility of leave of absence to the employees to attend to their personal exigencies and during times of emergency besides meeting statutory requirements.

Leave Rules:

- Leave cannot be claimed as a matter of right. The leave sanctioning authority may refuse or revoke leave of any kind depending upon the exigency of work.
- All leave shall be calculated with reference to the Financial Year – **April 1st to March 31st**.
- All permanent employees who have completed their probation period and are the confirmed employee in the organization are entitled to avail leave.
- Employees on probation shall be eligible for casual leave subject to which leads to **salary deductions**.

- Employee may avail leave subject to leave balance available to their credit with the prior approval of the authority authorised and empowered by the management to act on their behalf.
- All sort of leave applications should be made in a written format **via email only** and the same has to be submitted to the HR Department. Failing to which it will be considered as **leave without pay**.
- All application for leaves will have to be made **2 days** in advance and approved by the superior. If the required leave is for more than **5 days**, then the request needs to be made at least **10 days** in advance.
- All employees should avail their 21 days of leave and no leave will be **carry forwarded** for the next financial year, balance leave can be encashed at the end of financial year.
- Every employee can take **6 days** of leave on a single stretch on **quarterly basis** and will be eligible to take the remaining leaves for next quarter only.
- A new employee who completes his/her probation period is entitled to take **4 days** in a single stretch till he completes **one year** of service.
- A person who avails **6 days** of leave and in-case if he resigns then what ever excess leave will be deducted in his **F&F**.
- Sick leave may be sanctioned to meet requirements of an employee to nurse attend to his/her sickness.
- Any sick leave exceeding more than 4 days shall be supported by a Medical certificate.
- When the reporting head had not sanctioned leave, for whatever reason, and an employee remains absent, then such absence will be treated as **“Unauthorised Absence”**.
- Unauthorized Absence shall make an employee liable to disciplinary action under the provision of law.
- All leave records of employees shall be maintained in the HR Department.

6.0 ATTENDANCE AND IDENTITY CARD

6.01 Objective

To ensure an effective attendance marking system and comply with all applicable statutes.

6.02 Scope

This policy is applicable to all employees of the Company.

6.03 Procedure

The company will provide with identity card. Apart from the company's name and address, the card will have necessary details like name of employee, employee code, office address, etc. All staffs needs to wear their ID cards while on DC premises and its **mandatory** requirement. Any staff who persistently fails to wear their ID card, or refuses to wear it without good reason, in contravention of this policy will be subject to disciplinary action. This card serves the purpose of identification and security. In case of any damage or loss of the card by any employee he will have to inform the HR. Dept. so that a duplicate card can be issued. A fee of **200/-** may be assessed for replacement cards.

In case any employee resigns or is terminated from the services of the company, he is required to return the card to HR Department. We at DCICL have a compact and economical attendance recording system. On entering the office and while leaving, employees are required to punch their thumbs on the biometric attendance machine.

7.0 TRANSFER POLICY

7.01 Objectives

These rules have been framed in order to ensure that an employee transferred from one place to another is reimbursed his / her actual expenses to shift his family and household items and settle down well.

7.02 Applicability

These rules shall apply to all employees of the DCICL Company.

7.03 Eligibility

An employee will be entitled to claim reimbursement of expenses when he is joining the company from one location to another, provided the same is specifically agreed upon by the management (not within the same city)

7.04 Traveling Allowances On Transfer

- When an employee is transferred from one place to another, he / she and his/her family will be entitled to travel by the same mode and class by which the employee is entitled to travel under these rules. For example, if an employee is entitled to travel by 2nd AC he/her and his/her family will also be entitled to travel by 2nd AC.
- An employee, while on transfer, will also be entitled to some other benefits such as settling allowance, loading and unloading expenses, transportation of personal effects etc., which shall be governed by his transfer order.
- An employee on transfer will not be entitled to DA. However, under exceptional circumstances, if any employee and his family are required to make a halt en-route, requiring stay in hotel, food etc. the expenses incurred on such halts will also be reimbursed only if approved by Business head/ Director.
- If for any reason, all members of the employee's family can not proceed along with the employee to the new headquarters, traveling expenses of the family will not be provided if the employee's family members had not accompanied him / her to the new headquarter. In any case, as far as possible, shifting of the family to the new headquarter should be completed on the same date (date of joining at the new headquarter).
- An employee, who in consequence of his transfer is required to send his / her family to a station other than the place of transfer, the traveling expenses for his family members would be borne by him. Any additional reimbursement will require Managing Director's approval. However, employee will then not be entitled to claim traveling expenses of his family members to the new headquarter at a later date.
- Details and extent of reimbursement

GRADE	FARE
Staff members	3 rd AC rail fare
Manager – DGM	3 rd AC rail fare
GM & above	2 nd AC rail fare or Economy class Air fare

- Transportation: Reimbursement of actual freight up to one truckload from the shortest route from the place of origin till the place of joining. The reimbursement will be subject to production of original LR /RR. The transportation charges will be ½ basic or actual charges whichever is lower.
- Incidental: Employees will also be reimbursed Packing / Unpacking Loading/Unloading expenses on production of relevant documents.

8.0 EMPLOYEE INDUCTION

DCICL believes that its employees are a 'Family'. Whenever there is a new entrant in the family, the family members try to nurture the new member in such a manner that he quickly becomes a part of the family. The nurturing is carried out through a structured induction programme. The induction programme is aimed at introducing the new employee to the people, processes, systems and the total culture and environment that he / she has to become a part of. This will give the new employee the right information from the right people, which will help in making himself / herself, feel comfortable and create a sense of belonging.

8.01 Procedure

- A new employee, on the day of joining will first report to the HR department and meet the Head of Department or his representative. The new employee will be asked to complete the joining formalities by completion of various forms.
- The representative of the HR department will issue the Induction Programme schedule. This schedule will be prepared in advance jointly by a representative of the HR department and the Departmental Heads / Representative of the Dept. in which the new joiner is to work and also in co-ordination with the other Department Heads in which the new joiner will undergo induction.
- The Employee has to undergo the induction as per the schedule and to fill in Induction Feedback report based on what he/she understood about each and every process of the respective department.
- On completion of the above formalities, the representative of HR department will take the new joiner to the Department where he/she is assigned. The Department Head/HR Department/Supervisors will take him/her through the department and introduce him/her to colleagues, subordinates and associates. The Department Head will also clarify the role expected by him / her from the new joiner and generally try to brief him/her about the place of the Department in the overall organisation, the day-to-day conduct and procedure requirements.
- The representative of the HR department also introduces the new joiner to all the key personnel in the company.
- During the employees induction he/she is expected to jot down points that has been briefed about and also queries he/she has. This will help him/her be clear and also gain more exposure to certain areas in which he/she so desires.

9.0 TRAVEL POLICY (DOMESTIC)

9.01 Objectives

- To ensure that those who travel on behalf of Company, act responsibly in incurring expenses and that they comply with all applicable laws & regulations governing travel expenses.
- Travel expenses are not treated as income to the traveler only if the expenses are
 - Ordinary (common and accepted in your field of business)
 - Necessary (helpful & appropriate to your business)
 - Reasonable (not lavish or extravagant under the circumstances)
- Travel expenses incurred for an approved business purpose that are ordinary, necessary & reasonable.
- The safety of individuals traveling on behalf of Company is paramount importance. In the event of an emergency or in other situations where safety is a concern, higher travel cost may be justified.

9.02 Applicability

This policy shall apply to all employees of the Company, full time consultants, Probationers and Trainees who are called upon by the management to proceed on outstation duties (within India) for Company's business or to resume duties while on leave.

9.03 Process

- All travel must be approved in advance by the employees unless advance approval is impractical under the circumstances.
- It is the responsibility of the individual, planning to travel & seeking re-imbursement to obtain any necessary approval prior to travel.
- The employee must submit a tour programme to the higher authorities and get the same approved by the reporting officer.
- The tour programme should be submitted to HR at least **15 days** in advance, except in case of exigencies of work.
- In case of exigencies where written approval is not possible then the employee should get his / her tour programme approved by the higher authorities and the reporting officer via email.
- Before proceeding on tour, touring officer should properly plan his tour, set his objectives for the tour and make necessary preparations, so that all the jobs intended to be completed during the tour programme are completed in every aspect.

- The touring officer should forward all major points in advance to the offices, where he shall be visiting, so that the receiving offices will also keep themselves prepared to sort out the pending issues. This will save a lot of time for the touring officer and also ease his/ her work.
- As far as possible, the tour programme should be so designed that weekend/ holidays do not fall during the tour period.
- Journey should always be undertaken by the eligible mode and class of travel and by the shortest route unless otherwise specifically sanctioned, keeping in view that the time spent in journey does not affect working hours. Where journey is undertaken through a longer route, but taking less time than the shortest route, sanction for traveling by longer route is not required.
- Touring officers should report to branches at office hours, i.e. sharp at 10:00 am.
- Tour reports to be submitted along with the travel reimbursement vouchers for claiming the expenses.
- There will be no tour advance, if the travel is for **1 day** only.
- For employees touring for more than **3 days**, he/she will be allowed a tour advance of **Rs. 5000/- for Metro Cities and Non-Metro Cities**.
- For employees touring for **7 days or more**, he/she will be allowed a tour advance of **Rs. 10,000/- for Metro Cities and Non Metro Cities**.
- **Team lunch** not allowed in every visit and this will be only limited to National Manager / Business Head.
- Permission to travel by upper class or mode of travel should be obtained in advance from the approving authority before the commencement of tour, otherwise such extra expenses may not be allowed in the TA-DA bill.

9.04 Daily & Lodging Allowance

- The loading allowance is intended to cover expense related to lodging and other incidental expenses such as laundry charges. The daily allowance may be claimed on the basis of actual by submission of bills subject to limits prescribed in Annexure-I. If an employee makes his own arrangement for loading, in such case, he can claim flat lodging allowance @40% of the limits prescribed in Annexure II.
- Lodging Allowance is intended to cover expense related to food / incidental expenses (excluding liquor & cigarettes) of an employee while on tour. Lodging Allowance is payable for the number of days the employee was away from his headquarter, excluding any leave availed during the tour, as per limits prescribed in Annexure I.

- Normally, no leave could be availed by an employee while on tour. In case any employee falls sick beyond 2 days, he should terminate the tour programme under intimation in his HOD and return to his headquarter.
- For the payment of daily allowance / lodging allowance(flat), a day would mean, period of 24 hours from the time of commencement of journey from the employee's residence / headquarter and upto the time of his return to the residence / headquarter.
- It is likely that the actual expense on lodging of certain days of the tour may exceed the limits of lodging allowance as indicated in Annexure –I. Such expenses will be allowed provide it is within the cumulative entitlement of the employee for the entire period of the tour. For the purpose of clarity, it is further clarified that on some days expense may be less than the entitled limits, while on some days it may be more than the entitled limits, but the total expenses should be within the cumulative entitled limit of an employee for the entire duration of the tour.
- For the period spent in traveling (in train/car etc.) expenses should be claimed as per DA entitlement on flat rate basis as per limit prescribed in Annexure I.

9.05 Travel Advances

- The traveler must submit an expense report for tentative advanced travel expenses in the same manner as for expenses for which reimbursements is requested.
- Finance department will finally be the authority to sanction travel advances.
- In case, for any reason tour is cancelled, tour advance should be deposited back to the cashier immediately.
- Balance of tour advance, if any, should be deposited with the cashier within **seven days** after returning from the tour and submission of TA- DA bills. If the tour advance is not settled, such unsettled tour advance will be recovered from the employee's salary payable immediately.
- No further tour advance will be sanctioned if the earlier tour advance / claim is not settled / submitted.
- If the amount of a travel advance exceeds the amount of expenses approved for reimbursement, the traveler must reimburse the Company in an amount equal to such excess at the time the expense report is submitted.

9.06 Expense Report Approval

DCICL will reimburse travel expenses only if a traveler's expense report is approved by the **HOD / CFO / AUDITOR**. The HOD is responsible for reviewing the expense report to ensure that only ordinary, necessary and reasonable expenses are reimbursed. It is the traveler's responsibility to submit the approved expense report duly approved to the Finance & HR Department.

9.07 Use Of Travel Agency

All the business-related travel must be booked through Company's approved travel agent, unless it is impractical or not cost-effective to do so and an alternative method of booking travel is approved in advance by the reviewing party.

9.08 Mode Of Travel

- Journey should always be undertaken by the eligible mode and class of travel and by the shortest route unless otherwise specifically sanctioned, keeping in view that the time spent in journey does not affect working hours. Where journey is undertaken through a longer route, but taking less time than the shortest route, sanction for traveling by longer route is not required.
- Permission to travel by upper class or mode of travel should be obtained in advance from the approving authority before the commencement of tour, otherwise such extra expenses may not be allowed in the TA-DA bill.

9.09 ANNEXURE I

CLASSIFICATION OF CITIES

CLASS	CITIES
METRO	Mumbai, Kolkatta, Delhi, Noida, Chandigarh, Chennai
A	Bangalore, Hyderabad, Cochin, Ahmedabad, Pune, Indore, Jaipur
B	<p>North: Lucknow, Agra, Allahabad, Ambala, Amritsar, Jammu, Srinagar, Ludhiana, Shillong, Simla, Meerut, Udaipur, Karnal, Kanpur, Dehradun</p> <p>East : Patna, Cuttack, Bhubaneshwar, Imphal, Jamshedpur, Ranchi, Kohima, Gangtok, Guwahati, Agartala</p> <p>West : Gwalior, Bhopal, Gandhinagar, Rajkot, Baroda, Jabalpur, Aurangabad, Nagpur, Nasik, Panjim, Raipur, Surat</p> <p>South : Belgaum, Hubli, Mangalore, Mysore, Coimbatore, Madurai, Trichy, Trivandrum, Vijayawada, Vizag</p> <p>& all other state capital</p>
C	All other cities not mentioned above

9.10 ANNEXURE II

GRADE	CATEGORY	CLASS OF TRAVEL	METRO CITIES - A		CITIES - B		CITIES - C		LOCAL CONV.
			LODG.	BOARD.*	LODG.	BOARD.*	LODG.	BOARD.*	
M-1	CMD / DIRECTOR / CFO	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL	ACTUAL
M-2	GENERAL MGR. / V.P./N.M. / BUSINESS HEAD	AIR (ECO CLASS) / 2 nd AC / TAXI	3500	1000	2750	750	1750	700	TAXI (Any Limit)
M-3	DGM / AGM / ZM / BUSINESS MGR. / CHIEF MANAGER	AIR (ECO CLASS) / 2 nd AC / 3 rd AC / TAXI	3000	800	2250	700	1500	500	TAXI / AUTO
M-4	PRODUCT MGR./ SR. PRODUCT MANAGER / BRANCH MGR. / MANAGER / SR. MANAGER	2 nd AC / 3 rd AC	2500	650	1750	600	1000	550	AUTO / SHARE TAXI
M-5	ASM / DEPUTY MGR. / ASSISTANT MGR.	3 rd AC / Sleeper CLASS / BUS	2500	500	1500	450	1000	400	AUTO / BUS
M-6	SR. EXECUTIVE / EXECUTIVE / JR. EXECUTIVE	3 rd AC / Sleeper CLASS / BUS	2000	375	850	300	750	300	TRAIN / BUS

***Boarding includes amount spent on food and other miscellaneous expenditure. Please note that cigarette charges will not be a part of travel claim.**

10.0 MOBILE PHONE POLICY

10.01 Objective

To ensure effective communication for faster business transactions and quick co-ordination.

10.02 Eligibility

- All employees purely on need basis.
- Usage limit as per the below table or actual whichever is the lowest.

GRADE	CATEGORY	MOBILE CHARGES
M-1	CMD / CHAIRMAN / DIRECTOR / CFO	ACTUALS
M-2	GENERAL MGR. / V.P./ NATIONAL MANAGER / BUSINESS HEAD	500
M-3	RM / DGM / AGM /ZM / SR. MGR. / BUSINESS MANAGER.	400
M-4	PRODUCT MGR./ BRANCH MGR. / MANAGER	300
M-5	ASM /DEPUTY MGR. / ASSISTANT MGR.	200
M-6	SR. EXECUTIVE / EXECUTIVE / JR. EXECUTIVE	200

10.03 Procedure

- The Company shall bear the post-paid expenses (rental & call charges). The above usage limit covers rent & calls.
- Handset will not be provided by the Company. Procuring the handset is the employee's responsibility.
- The employees have to approach his/her HOD to know whether they are eligible for mobile calls reimbursement. A proper approval taken from the respective HOD has to be sent to HR & Administration department.

10.04 Billing

- The employees need to mark official calls & the personal calls (Local/STD) made and the amount spent.
- Employees will also have to confirm the calls which have been made on company's business, incase the reimbursement are in excess of his entitlement.
- In case of exceeding these limits, prior approval of the HOD will be required before making the payments.
- The Administration department will record personal call amount and inform the HR department for recovery.

11.0 COMPENSATION

- The Philosophy of DCICL is to compensate every employee on a fair and equitable basis and the compensation package offered should be competitive to attract the best available talent and to motivate them to seek greater responsibility. The Managerial and other Personnel are paid salary according to the classification level reflecting the degree of responsibility and accountability. Each classification level has appropriate minimum and maximum salary bracket.
- The HR Department or any competent body at Unit level will be responsible for ensuring the implementation of this policy and timely disbursement of salary and other perks to all employees. HR Department or any other competent body in Units in consultation with accounts department will do authorized deductions in accordance with established policies and statutory provisions.
- Schedule
 - In the Corporate Office, salary of all employees will be paid directly by crediting the same in their bank accounts latest by 1st week of following month. In case of delay, the HR and Administration Department will intimate to all staff members the date of crediting the salary to their bank accounts.
 - The payment for every month will be made on the basis of actual attendance.
 - Deductions such as unpaid absences, income tax and other statutory deductions will be deducted from the monthly pay.

- Regarding Units at various locations, salary disbursement will be decided taking into consideration the local situation; however disbursements will take place latest by 1st week of every month at any location.
- The entry level salary will be fixed by HR Department only, taking into account educational qualification, experience, and expertise in respective field, proven track record, capabilities, compensation and position in previous employment.
- The company periodically reviews its compensation structure for Supervisory Personnel to ensure that it is competitive and motivates employees who contribute in achieving the company's objectives and develop their full potential.

12.0 CONFIRMATION POLICY

As a matter of fact, Assessment of an employee is very generic during interview process. Hence, to assess one's competencies and on the job performance, it is essential to observe him/her on the job performance for a fair period of time. With this philosophy, all new entrants will be employed on probation for a period of **six months** starting from the date of joining.

Procedure

- HR department will send probation appraisal forms in respect of aforesaid employees to their concerned Head of Department.
- Head of Department will outline an objective assessment of probationer and will fill in the prescribed appraisal form. Duly filled in form will be forwarded to HR department for onward action.
- If probationer is recommended for confirmation, HR department will issue confirmation letter to concerned employee and acknowledged copy will be filed in his personal file for records.
- If Head of Department has recommended extension of probation, HR Department will issue extension letter and will offer help to HOD / probationer for betterment of performance during extended period of probation.
- In case, Head of Department recommends termination of services of probationer, after completion of initial or extended period of probation, HR department will communicate the same to concerned employee. Without assigning any reasons thereof, whatsoever and full and final settlement of his dues will be done according to procedure laid down in separation policy.
- An employee will be deemed to be continuing on probation until he is communicated in writing by the management about him being confirmed in the services of the company.

13.0 PERFORMANCE APPRAISAL

13.01 Objective

- The objectives of appraisal system are:
 - To make the employees aware of their major areas of responsibilities.
 - To identify each area of responsibility and link the relevant contribution of the employee.
 - To share with the employee their strengths, areas for improvement and potential.
 - To assist the employee to develop personal and professional growth through self-analysis and counseling.
 - The appraisal is an important basis for evaluating an employee for the rewards, assess their potential and also to help them know their career path.
- For the purpose of increments or promotions, the performance period considered will be from **April to March** every year.

13.02 Eligibility Criteria

- An employee, who has joined the services of company **on or before September** will be considered eligible for being assessed for his performance appraisal.

13.03 Procedure

- The Appraisal will be **Goal Sheet** based and use the **Balanced Score Card** method of rating.
- The HR, in consultation with the Department Heads, will decide the matrix of ratings.
- HR department will also compile a list of all employees recommended for promotion by all such cases will jointly be discussed and approved by Departmental Heads, Human Resource and Managing Director.
- HR department will prepare increment and promotion letters for all eligible employees along with revised salary break-up. HR will sign the increment letters whereas Department Heads will sign the Promotion letters. These letters then will be forwarded to Immediate Supervisors for onward issuance to employees who will acknowledge copy the same and submit to HR department for records.
- HR department will update all relevant records and will ensure filing of a copy of increment and / or promotion letter in personal file of respective employee.

14.0 SALARY ADVANCE & LOAN POLICY

Salary Advance / Loan may be granted to an employee owing to unforeseen circumstances which places him/her in a difficult financial position requiring assistance from the Company.

- **Approval:** Salary advance form / Loan Form to be filled by Employee and then forwarded to HR Department for processing.
- **Emergencies** for which Salary Advances / Loan may be sanctioned are,
 - In case of **Medical Treatment** for self, spouse, children, parents, Unmarried brothers and sisters.
 - A **Death** in Family of an employee.
 - A **Marriage** of the employee.
 - For **Educational Assistance** for an employee's own education.
 - Eligibility of salary advances will be **once** in a year and for loan will be **one** year after settling the previous loan, if any.
- **Eligibility:** For salary advance, a confirmed employee, who have completed minimum **one** year in the company, will be eligible. A confirmed employee, who has completed minimum **three** years in the company, will be eligible for Loan.
- **Duty to recover:** HR and Accounts Department will be responsible to recover salary advance.
- **Recovery:** Salary Advance will be recovered in respective month's salary in which it is paid.
- **Amount to be paid:** Salary advance will be a maximum of the **60%** of Gross Monthly Salary of the employee. The amount of Loan to be sanctioned will be purely on discretion of Management.
- **Preparation of Payment voucher:** Salary Advance voucher will be prepared by the concerned employee, which will be duly authorized by his Head of Department and then forwarded to HR Dept.
- At the time of preparation of salary for the month, the Accounts Department will give a printout of Salary Advance Account before 21st of the month, which shall be reconciled by HR Department with the Salary advance register and accordingly deducted from the salary of employee.

15.0 TRAINING AND DEVELOPMENT

15.01 Objective

- Our company believes that if Human Resources have to be developed, the Organization should create condition in which people acquire new knowledge and skills and have healthy patterns of behavior and styles. Training is essential because technology is continuously improving. Systems and practices get outdated soon due to new invention and implements in technology. This leads to new ways of doing things. Our business believes training is a two-way process. We encourage employees to participate and to highlight any gaps in their own skills or knowledge they believe they have.
- Training includes internal on-the-job training, written instructions such as standard operating procedures, coaching, external training and courses. Training like any other activity in the organization is meant to help in the achievement of organizational goals. The organization evaluates the various inputs in terms of cost benefit ratio. It is necessary to collect data to show how training is helpful in improving productivity and reducing wastage etc. Employees are responsible for their own development and as such may inform the Organization of their developmental needs and take part in prescribed development activities.

15.02 Identification Of Training Needs

- A good system of training starts with the identification of training needs. The following sources will be used to identify training needs:
- Performance Appraisal: Performance Appraisal helps in identifying different aspects in which the individual should be trained and developed. This helps in planning and conducting in- house programme, on the job training or external training
- Potential / Self Appraisal: This also helps in identifying training needs for those employees who are identified for performing future roles in the organization.
- Individual Need Assessment: An individual employee feeling a need to upgrade his knowledge or skills in specific area shall discuss the same with his immediate superior, who in turn informs HR department about training need.

15.03 Procedure

- The existing performance appraisal provides for identification of training needs. The training needs identified for various grade of staff and managers are taken care by either of the following:
 - In-House Training Programme
 - Sponsoring employees to training programme organized by external institutions.
- In-House Training Programme:
 - **Listing out Programme:** After the training needs for various levels are analyzed and tabulated, the HR Department will list out subjects on which sizeable numbers of employees are to be trained. This will help in deciding whether to conduct session in-house or depute employees for external training.
 - **Clubbing Employees at all units / Group Companies:** Whenever a training programme is organized within the company, employees of all units / group companies will be co-opted based on final decision of unit head in consultation with HR Department on the names of persons who should attend.
 - **Organizing In -House Training Programme:** The HR Department will organize in-house training programme depending on the need of that particular unit and their training needs.
 - **Release of Employees for Training Programme:** Whenever training programme is organized by HR Department, the Departmental Head will release the participants to attend this programme. In case of compelling reasons the case should be intimated to the HR Department in advance so that alternative action can be taken.
- External Training Programme: The HR Department will keep a record of likely programme to be conducted by different institutions and associations. External courses and professional qualifications may be fully or partly funded by the Organization depending on the nature of the training.

15.04 Budget

A training budget for the forthcoming year will be decided in consultation with head of the department / unit heads. The company has certain provisions regarding individual training programs. All employees that have worked for the company more than **one year** are eligible to participate in external training programs individually or in teams. We will set a budget at the beginning of a year, which we'll renew annually.

The employee has to bear **10%** of the **total cost** which is involved in his/her training. If an employee decides to drop or cancel a training, they'll have to inform HR immediately and they'll also have to shoulder any cancellation or other fees incurred during the process. An employee who have participated in the external training program cannot leave the organization for **one year**. **In case the employee chooses to quit then he has to repay the total cost involved in the training program.**

16.0 WHISTLE BLOWER POLICY

1. Preface:

- Section 177 of the Companies Act, 2013 and Clause 49 of the Listing Agreement requires every Listed company (and such class of companies as may be prescribed) to establish vigil mechanism ('Whistle Blower Policy') for directors and employees to report to the management instances of unethical behavior, actual or suspected, fraud or violation of the Company's code of conduct or ethics policy. The vigil mechanism is required to provide adequate safeguards against victimization of persons who use such mechanisms and also to ensure direct access to the Ethics Counsellor or Chairman of the Audit Committee in appropriate or exceptional cases.
- The Whistle Blower Policy ("the Policy") has been formulated with a view to provide a mechanism for employees and Directors of the Company to approach the Ethics Counsellor or Chairman of the Audit Committee of the Company.
- The Audit Committee may appoint an Ethics Counselor to assist in the administration of the Whistle Blower Policy.

2. Definitions:

The definitions of some of the key terms used in this Policy are given below. Capitalized terms not defined herein shall have the meaning assigned to them under the Ethics Code.

- **"Audit Committee"** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 177 of the Companies Act, 2013 read with Clause 49 of the Listing Agreement.
- **"Employee"** means every permanent employee of the Company (whether working in India or abroad), including the Directors in the employment of the Company.

- **“Ethics Counsellor”** means the Head - HR or Compliance Officer responsible for the implementation and compliance of Whistle Blower Policy.
- **“Investigators”** means those persons authorised, appointed, consulted or approached by the Ethics Counsellor / Audit Committee and shall include the auditors of the Company.
- **“Protected Disclosure”** means any communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity.
- **“Subject”** means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation.
- **“Whistle Blower”** means a Director or an Employee making a Protected Disclosure under this Policy.

3. Scope:

- The Whistle Blower’s role is that of a reporting party with reliable information. They are not required or expected to act as investigators or finders of facts, nor would they determine the appropriate corrective or remedial action that may be warranted in a given case.
- Whistle Blowers should not act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested by the Ethics Counsellor or by the Chairman of the Audit Committee or by the Investigators.
- Protected Disclosure will be appropriately dealt with by the Audit Committee as the case may be.

4. Eligibility:

All Directors / Employees of the Company are eligible to make Protected Disclosures under the Policy.

5. Disqualifications:

- While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.
- Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a *mala fide* intent.

- Whistle Blowers, who make three or more Protected Disclosures, which are subsequently found to be *mala fide*, frivolous, baseless, malicious, or reported otherwise than in good faith, will be disqualified for a period of six months from reporting further Protected Disclosures under this policy. In respect of such Whistle Blowers, the Audit Committee may recommend to the Company appropriate disciplinary action.

6. Procedure:

- All Protected Disclosures concerning financial/accounting matters should be addressed to the Chairman of the Audit Committee of the Company for investigation.
- All Protected Disclosures concerning unethical matters should be addressed to the Ethics Counsellor of the Company for investigation.
- Protected Disclosures in respect of employees at the levels of Vice Presidents and above should be addressed to Chairman of the Audit Committee of the Company.
- If a protected disclosure is received by any executive of the Company other than the Ethics Counsellor / Chairman of Audit Committee, the same should be forwarded to the Ethics Counsellor / Chairman of Audit Committee as the case may be for further appropriate action. Appropriate care must be taken to keep the identity of the Whistle Blower confidential.
- Protected Disclosures should be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English, Hindi or in the regional language of the place of employment of the Whistle Blower.
- The Protected Disclosure should be forwarded under a covering letter which shall bear the identity of the Whistle Blower. Ethics Counsellor / Chairman of Audit Committee as the case may be shall detach the covering letter and forward only the Protected Disclosure to the Investigators for investigation.
- Protected Disclosures should be factual and not speculative or in the nature of a conclusion, and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and the urgency of a preliminary investigative procedure.
- The Whistle Blower must disclose his/her identity in the covering letter forwarding such Protected Disclosure. Anonymous disclosures will not be entertained as it would not be possible to interview the Whistle Blowers.

- If any of the member of the Audit Committee have a conflict of interest in a Protected Disclosures, they should recuse themselves and others on the Committee shall deal with the same.

7. Investigation:

- All Protected Disclosures reported under this Policy will be investigated by the Ethics Counsellor / Audit Committee of the Company who will investigate/ oversee the investigations under its authorization.
- The Ethics Counsellor / Audit Committee may at his / its discretion, consider appointing any Investigators for the purpose of investigation.
- The decision to conduct an investigation taken by the Ethics Counsellor / Audit Committee is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may or may not support the conclusion of the Whistle Blower that an improper or unethical act was committed.
- The identity of the Subject will be kept confidential to the extent possible given the legitimate needs of law and the investigation.
- Subject will be informed of the allegations at the appropriate stage and will have opportunities for providing their inputs / explanation during the investigation.
- Subject shall have a duty to co-operate with the Ethics Counsellor / Audit Committee or any of the Investigators during investigation to the extent that such co-operation will not compromise self-incrimination protections available under the applicable laws.
- Subject has a right to consult with a person or persons of his / her choice, other than the Ethics Counsellor / Investigators and/or members of the Audit Committee and/or the Whistle Blower.
- Subject shall not interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the Subject.
- Unless there are compelling reasons not to do so, Subject will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrong doing against a Subject shall be considered as maintainable unless there is evidence in support of the allegation.

- Subject has a right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Subject and the Company.
- The investigation shall be completed normally within 45 days of the receipt of the Protected Disclosure.

8. Protection:

- No unfair treatment will be meted out to a Whistle Blower by virtue of his/her having reported a Protected Disclosure under this Policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Subject to clause 5 (c) above, complete protection will therefore be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination/suspension of service, disciplinary action, transfer, demotion, refusal of promotion, or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his/her duties/ functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure, etc.
- A Whistle Blower may report any violation of the above clause to the Chairman of the Audit Committee who shall investigate the same and recommend suitable action to the management.
- The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law. Whistle Blowers are cautioned that their identity may become known for reasons outside the control of the Ethics Counsellor / Audit Committee (e.g. during investigations carried out by Investigators).
- Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

9. Investigators:

- Investigators are required to conduct a process towards fact-finding and analysis. Investigators shall derive their authority and access rights from the Ethics Counsellor / Audit Committee when acting within the course and scope of their investigation.

- Technical and other resources may be drawn upon as necessary to augment the investigation. All Investigators shall be independent and unbiased both in fact and as perceived. Investigators have a duty of fairness, objectivity, thoroughness, ethical behavior, and observance of legal and professional standards.
- Investigations will be launched only after a preliminary review which establishes that:
 - The alleged act constitutes an improper or unethical activity or conduct, and
 - either the allegation is supported by information specific enough to be investigated, or matters that do not meet this standard, may be worthy of management review, but investigation itself should not be undertaken as an investigation of an improper or unethical activity.

10. Decision:

If an investigation leads the Ethics Counsellor / Audit Committee to conclude that an improper or unethical act has been committed, the said Ethics Counsellor / Chairman of Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as the said Committee deems fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

11. Reporting:

The Ethics Counsellor / Chairman of Audit Committee shall report to the Board periodically about all Protected Disclosures referred to them together with the results of investigations.

12. Retention of documents:

All Protected Disclosures in writing or documented along with the results of investigation relating thereto which has been proved shall be retained by the Company for a minimum period of five years. Other Protected Disclosures may be destroyed at the end of the financial year.

13. Amendment:

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. The Ethics Counsellor / Audit Committee will also review the Whistle Blower Policy and suggest amendments to make it responsive and relevant to the changing times.

However, no such amendment or modification will be binding on the Employees unless the same is notified to the Employees in writing.

17.0 POLICY ON SEXUAL HARASSMENT AT WORKPLACE. (Prevention, Prohibition and Redressal)

1. Preamble

- The DC Infotech and Communication Limited (DC) is committed towards creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment.
- The policy is made under the overall statutory requirement in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- The commission of the offence of Sexual Harassment as per Indian Penal Code 1860 is a penal offence under which the punishment can range from simple to rigorous imprisonment or fine or both.

2. Objective

- The policy has been formulated to create and maintain a safe working environment where all employees treat each other with courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. Employees at DC are entitled to work in an environment free from any form of discrimination or conduct which can be considered harassing, coercive, or disruptive.
- To articulate the guidelines on sexual harassment and to provide a mechanism for the prevention and redressal of complaints of sexual harassment.
- To assist individuals who believe that they have been subjected to such behaviour with appropriate support and remedial action.

3. Scope and Applicability

- This policy is applicable to all Employees of DC Infotech and Communication Limited regardless of the position, including those on contract with the Company.
- The policy will also cover trainees, consultants, contractors and outsourced staff associated with DC Infotech and Communication Limited.
- The policy will remain applicable wherever such persons have occasion to interact with each other including for example, in vehicles, third party premises, off site meetings and public venues.
- It covers sexual harassment of women by men or of men by women or between the same sexes. Harassment is unlawful irrespective of who is involved in the behaviour.

Note: Ignorance of any aspect of this policy will not be a defense during an enquiry on the matter.

4. Definitions

Act: means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 which extend to the whole of India.

Aggrieved woman: means in relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

Internal Committee: means an Internal Complaints Committee constituted under Section 4 of the Act.

Respondent: means a person against whom the aggrieved woman has made complaint under section 9 of the Act.

Workplace:

“Workplace” includes – Head Office, Manufacturing Units, branch offices, construction sites of DC Infotech and Communication Limited. It also includes any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

Employer:

Employer refers to DC Infotech and Communication Limited (DC).

5. What constitute Sexual Harassment?

- Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) viz.:
 - Physical contact and advances; or
 - A demand for request for sexual favours; or
 - Making Sexually coloured remarks; or
 - Showing pornography; or
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- All such conducts becomes sexual harassment whether textual, graphic or electronic or by any other actions which may contain:
 - Implied or explicit promise of preferential treatment in aggrieved woman’s employment.
 - An implied or explicit threat of detrimental treatment in that aggrieved woman’s employment.
 - An implied or explicit threat about her present or future employment status of aggrieved woman.

- The conduct interferes with an employee's work or creates an intimidating, hostile or offensive work environment.
- Humiliating treatment that is likely to affect health and safety.

Additionally, DC holds the right to prohibit any conduct that may reasonably be interpreted as harassment whether or not such conduct is pervasive and severe enough to meet the technical legal requirements of harassment.

Note:

It is the impact or effect of the behaviour on the recipient and not the intent of the offender that is critical in an assessment of such issues/cases. If the behaviour can be reasonably perceived as offensive or intimidating by the persons receiving it, it should be stopped. As such, all employees have a responsibility to communicate clearly to colleagues about behaviour that may be offensive and ask that it be discontinued.

- The term Sexual Harassment also includes such unwelcome sexually determined conduct (whether directly or by implication) as:
- Physical Harassment, which includes:
 - Physical contact and advances
 - Intentional touching, pinching, grabbing, fondling, patting brushing against another's body
 - Sexual assault
 - Any physical conduct which is unwelcome
- Verbal Harassment, which includes:
 - A demand or request for sexual favors over promises related to employment such as work conditions, promotion, and increments. This is known as "quid pro quo" sexual harassment.
 - Gesture-based harassment - sexually colored remarks
 - Making direct or indirect sexually suggestive comments, threats, slurs, sexual propositions
 - Sexual jokes or teasing, misogynist humor, sexually colored gender specific jokes
- Written Or Graphic Harassment, which includes:
 - Showing pornography, and
 - The display of pornographic material
 - Written material that is sexual in nature such a letter or notes containing a sexual Comment
 - Leering or staring at another's body and/ or sexually suggested gesturing
 - Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmes, catalogues of a sexual nature
 - Sexual messages or images sent via text / e-mails which may be perceived by the recipient as creating a hostile work environment

- Any Other Unwelcome Physical, Verbal or Non Verbal Conduct of sexual nature apart from those listed above will constitute as sexual harassment if by reasonable perception and common discretion qualifies as sexually offensive.

6. Consensual Sexual Relationships at workplace

DC discourages any kind of romantic or sexual relationships amongst its employees as such relationships could lead to conflicts of interest at work. However, in the best interest of all concerned, if any of such relationship, particularly between a member of Management or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person); the involved parties should notify Management of the Company so that the reporting chain can be altered to ensure that no direct or indirect reporting relationship continues.

7. Internal Complaints Committee

The Company has formed an Internal Complaints Committee which will manage the process of enquiry and appropriate settlement of sexual harassment complaints in accordance with the provisions of the Act. The name, designation and contact details of the members of the committee have been furnished in Annexure 1. The Guiding principle of constitution of the Internal Compliance Committee has been stated in Annexure 2.

8. Reporting

An employee who is the recipient of any inappropriate conduct or unwelcome behaviour, indicating sexual harassment is expected and encouraged to report the same to the **Internal Complaints Committee** at the earliest. All precaution will be taken to protect the privacy of individuals involved. Based on the circumstances of each case, the involved parties may choose to deal with a complaint through either an informal or formal process.

9. Redressal Processes

The redressal process will be sensitive to the particularly delicate nature of Complaints related to sexual harassment. Two types of redressal processes can be adopted:

▪ Informal Redressal Process

The informal process provides individuals, an opportunity to resolve issues immediately and in an open, honest, non-threatening manner. Internal Complaints Committee with the assistance of respective HR function initiate the informal redressal process. It could take the form of:

- a) Directly speaking with the alleged offender.
- b) Involving the HR facilitator to arrive at a mediated resolution.

- **Possible Actions in Informal Redressal:**

- a) Verbal Warning to the alleged harasser by HR
- b) A discussion where the complainant and the alleged harasser are invited by HR to discuss and resolve the issue at that level itself.

- **Formal Redressal Process**

Where the informal resolution has not been satisfactory for both or either parties or in situations where complaint is too serious to be resolved informally, the formal process of investigation is followed. It is to be noted that the decision to opt for an informal process will not reduce either party's right to later shift to a formal process if either of them feels that they did not get a fair decision. To enable a formal investigation, a written complaint with details must be submitted. The steps of Formal Redressal process are as follows:

- **Receipt of complaints:**

- a) All complaints should be in writing to ensure consistency and accuracy.
 - b) The complaint should be made within **90 days** from the date of occurrence of the alleged incident.
However, due to the sensitivity of this issue and the emotional toll that may have been experienced, a delay may be considered favourably by the Internal Complaints Committee, provided the complainant submits sufficient cause for such delay.
 - c) The name of the alleged offender including designation and contact numbers should be mentioned in the written complaint.
 - d) The date, time and location of the alleged incident of harassment should be mentioned.
 - e) A detailed description of the incident in question as well as other relevant circumstances should be mentioned.
 - f) Names of witnesses and physical and/or documentary proof, if any, that supports the allegation including other potential complaints, if any, should be mentioned.
 - g) The complaint letter should be signed and dated; no anonymous complaints shall be accepted.
 - h) Where the aggrieved woman is unable to make a complaint on account of her physical or mental capacity or death or otherwise, her relative or legal heir or such other person as may be prescribed by the Act and the Rules may make a complaint.
- The committee shall hold a meeting with the Complainant within 7 working days of the receipt of the complaint, but not later than 10 working days in any case. In exceptional cases, emergency meeting may be convened by the Chairperson as per the requirement. The complainant and the respondent should be given a written notification to present themselves before the committee.

- At the first meeting, the Committee shall hear the Complainant and record his / her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written, etc. to substantiate the complaint. If the Complainant does not wish to depose in person due to embarrassment of narration of events, a lady Committee Member for lady employee(s) and a male Committee Member for male employee(s) shall meet and record the statement.
- Thereafter, the Committee shall summon the person against whom the Complaint is made for the purposes of a deposition before the Committee and an opportunity shall be given to such person to give an explanation to the allegations.
- Based on the type and severity of the complaint, the Committee may direct that case requires an Inquiry be conducted with a detailed investigation. The Internal Complaints Committee may not order an inquiry, if examination of witness / documents is not necessary to arrive at a conclusion.
- In the investigation, it should be ensured that at all times the dignity of both the complainant and the alleged harasser is respected.
- During the course of investigation, both the parties will be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
- While undertaking investigation of a complaint, the committee shall take the following into consideration:
 - a) Whether the conduct was verbal or physical or both.
 - b) How frequently it happened.
 - c) Whether the conduct was unwelcome.
 - d) The working relationship in terms of hierarchies between the alleged harasser and the affected person.
 - e) Whether others joined in perpetuating the harassment.
 - f) Whether harassment was directed at more than one individual.
 - g) The impact of the harassment on the affected person.
- During the pendency of inquiry, on a written request made by the aggrieved woman, the Internal Complaints Committee may recommend to the employer to-
 - a) Transfer the aggrieved woman or the respondent any other work place.
 - b) Grant leave to the aggrieved woman upto a period three months.
 - c) Grant such other relief to the aggrieved woman as may be prescribed under the Act or Rules made thereunder.
 - d) Provide counseling aid to the aggrieved women at cost to her.

▪ Inquiry Process

- a) The **Internal Complaints Committee** shall proceed with inquiry within 7 working days of its commencement and communicate the same to the Complainant and person against whom complaint is made. The venue of the Inquiry shall take into consideration the convenience of the complainant and the person against whom the complaint is made. The identities of the Complainant, the person against whom the complaint is made and all witnesses shall throughout be protected and kept confidential by the Committee.
- b) The Internal Complaints Committee shall prepare and handover the Statement of Allegation to the person against whom complaint is made and give him/her an opportunity to submit a written explanation if he / she so desires within seven working days of receipt of the same.
- c) If the Complainant or the respondent desires any witness (es) to be called, they shall communicate in writing to the Committee, the names of witness (es) that they propose to call. The responsibility of communicating with the witnesses lies with the complainant / respondent regarding the date, time and venue of the meeting.
- d) If the Complainant desires to tender any documents by way of evidence before the Committee, he / she shall supply original / true copies of such documents. Similarly, if the respondent desires to tender any documents in evidence before the Committee, he / she shall supply original / true copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be true copies of the original. The Committee shall have the power to summon any official papers or documents pertaining to the complaint under enquiry.
- e) The Internal Complaints Committee shall call upon all witnesses mentioned by both the complainant and the respondent. The Committee may at its sole discretion, summon necessary and relevant document / witness, if it is of the opinion that it shall be in the interest of justice.
- f) The Internal Complaints Committee shall provide every reasonable opportunity to the Complainant and the respondent for putting forward and defending their respective case. The Committee shall retain the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, slanderous, derogatory or gender insensitive. Any behaviour, verbal or otherwise, on the part of the defendant that is designed to intimidate or subject the complainant or his / her witness to mental and physical trauma, shall entitle the Committee to recommend disciplinary action against the defendant.
- g) The Complainant and the respondent shall have the right of cross-examination of all witnesses.

- h) If the Internal Complaints Committee believes that the absence of either of the Complainant or the respondent and or their witnesses to the dispute is on valid grounds, the Committee shall adjourn its meeting for a period not exceeding fifteen working days. The meeting so adjourned shall be conducted thereafter, even if the person concerned fails to appear for the said adjourned meeting of the Committee without prior intimation / valid grounds.
- i) The Internal Complaints Committee shall have the right to summon, as many times as required, the respondent, the complainant and / or any witnesses for the purpose of supplementary testimony and / or clarifications.
- j) The Internal Complaints Committee shall have the right to terminate the proceedings and to give an 'ex-parte' report on the complaint, should the respondent fail, without valid ground, to present himself for three consecutive hearings convened by the Committee.
- k) The Internal Complaints Committee shall complete the 'Inquiry' within reasonable period but in no case beyond 90 days from the date of its commencement and submit the Inquiry Report to the MD of DC Infotech and Communication Limited within a period of ten days from the date of completion of the inquiry and such report shall be made available to the concerned parties.

▪ **Corrective Actions:**

Where an incident of harassment has been substantiated, corrective/ disciplinary action based on the gravity of the offence will be recommended by the Internal Compliance Committee. The range of penalties can vary from (but not be limited to):

- a) A letter of warning be sent to the employee and a copy of which shall be placed in the personal file of that employee by Human Resource Department.
- b) Immediate transfer or suspension without pay or both.
- c) Deduction from salary or wages of the Respondent such sum as may be considered appropriate to be paid to the aggrieved employee or to her legal heir.
- d) Stoppage of increment with or without cumulative effect.
- e) Reduction in rank.
- f) Termination / dismissal from the services of the Company.
- g) Any other action that the MD of DC Infotech and Communication Limited may deem fit and proper.
- h) Filing a complaint before the relevant police station or court.
- i) A second or repeated offence shall on the recommendation of the Internal Complaints Committee attract an enhanced penalty.

If DC is unable to make such deductions from the salary of the respondent for any reasons whatsoever, it may direct respondent to pay such sum to the aggrieved woman.

In case of the respondent fails to pay the sum referred to above, the Internal Complaints Committee may forward the order for recovery of the sum as arrear of land revenue.

Where the Internal Complaints Committee comes to the conclusion that allegation against the respondent has not been proved, it shall recommend to the employer that no action is required to be taken in the matter.

DC will act upon the recommendations within sixty days of receipt of the order from the Internal Complaints Committee.

▪ **Communication**

- a) The disciplinary action to be awarded should be disclosed to the respondent and the complainant separately.
- b) The information regarding an event of sexual harassment may be disseminated after completion of the redressal process amongst the employees without disclosing name, address, identity or any other particulars which lead to the identification of the aggrieved party and witnesses.
The committee at all times should be sensitive to the possibility of the harasser displaying retaliatory behaviour.
 - For the purpose of determining the sums to be paid to the aggrieved employee, the Internal Complaints Committee shall have regards to the following:
 - a) The mental trauma, pain, suffering and emotional distress caused to the aggrieved women.
 - b) The loss in career opportunity due to the incident of sexual harassment
 - c) Medical expenses incurred by the victim for physical or psychiatric treatment.
 - d) The income and financial status of the respondent.
 - e) Feasibility of such payment in lump sum or in installments.

10. Confidentiality

It shall be the duty of all the persons involved in the inquiry process to ensure that all complaints lodged are treated with utmost confidentiality. Any breach of this can invite disciplinary action before, during or after the inquiry.

11. Protection against retaliation

Retaliation is a serious violation of this policy. The Company forbids any form of retaliation against anyone who has reported a suspected episode of harassment or has cooperated in any investigation involving a reported case. (Examples of retaliation may include – but are not limited to - threatening a negative action on terms of employment, unsubstantiated negative performance evaluation, continued harassment in any form, discriminatory treatment or failure to provide or consider individual concerned for a Company benefit or for a warranted role, title, training or promotion).

If anyone feels that he / she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the **Internal Complaints Committee**.

As with complaints of harassment, this too will be treated as misconduct and DC will take appropriate action to prevent / rectify the retaliation. It will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven. Similarly, bringing undue influence whether directly or indirectly, to the proceedings of an Inquiry by either party will be treated as misconduct and be subjected to disciplinary action.

12. Appeals and Alternate Remedies

Either party subjected to administrative or disciplinary action may appeal against such actions to the MD of DC within **7 working days** after conclusion of the investigation and communication of the consequences.

Additionally, nothing in this policy shall prevent the complainant or the respondent from pursuing formal legal remedies or resolution through Govt. agencies or the courts of law of the country.

13. Treatment of False Complaints/ Allegations

Where the **Internal Complaints Committee** arrives at a conclusion that the allegation against the accused person is false or malicious or the aggrieved person has made the complaint knowing it to be false or the aggrieved person has produced forged or misleading documents / evidence, such behavior will be construed as a major misconduct and will be liable for disciplinary action including termination of services.

14. Separated Employees

The Committee shall receive complaints, as per this Policy, from an employee who has experienced such harassment during his / her employment, but has since left DC so long as the complaint is received in writing within 3 months from the date of incidence.

15. Roles and Responsibilities

- **Employees:** are encouraged to familiarize themselves with the key elements of the policy and should:
 - a) Abstain from committing any acts which amount to sexual harassment.
 - b) Report incidents of sexual harassment without fear or favour.
 - c) Create an environment of conduciveness for co-workers to work together without fear of harassment.

▪ **Head of Departments**

- a) Provide appropriate working conditions in respect of work and ensure there is no hostile environment in the work place.
- b) Guide the employee as to the proper procedure for registering the complaint.
- c) Provide appropriate lighting and safety in factory, corridors and other office spaces where Employees move about in the course of their working.
- d) Do not initiate an enquiry on your own.
- e) When approached by an employee for your counsel, avoid making a quick judgment as to the right and wrong and hold back advice / opinions.
- f) Since it is difficult for victims of harassment to come forward with their complaints; do not cross – question the individual or give the impression of doubting the authenticity of his / her report.
- g) Report any complaint or grievance immediately to the concerned authorities.
- h) Ensure privacy for the meeting and help the employee feel that confidentiality will be maintained.
- i) Ensure that there is no retaliation or retribution happening at the workplace where the supposed action is to have taken place.
- j) Ensure that issues pertaining to sexual harassment are discussed periodically during the meeting. During such meetings, relevant details such as the brief outline of this policy, the details of the members of the Complaints Redressal Committee shall also be discussed.
- k) Implement the disciplinary action along with HR.

▪ **HR Department**

- a) Conduct necessary communication and training across the Company, with respect to sexual harassment at the workplace.
- b) Ensure this policy is communicated, explained and handed over at the time of induction of every employee.
- c) Any act of sexual harassment to be notified as misconduct under the standing orders of the Company.
- d) Provide sufficient security at the entry as well as the exit points and in cases where women employees are transported from and to the work place working in late shift hours.
- e) Clarify to Employees on any queries related to this policy wherever required.
- f) Maintain records of all the Sexual Harassment cases and finding.

16. Evaluation of Policy

- The Sexual Harassment Policy shall be evaluated so that any amendments required may be recommended by the Complaint Redressal Committee based on their experience of dealing with complaints.

- The exercise shall be an annual exercise at the minimum. The Policy will be flexible to amendments to address situations that the policy has not covered at the onset.

17. Annual Report

The Internal Complaints Committee will prepare an Annual Report as per the Act comprising the following details:-

- Number of complaints of sexual harassment received in the year.
- Number of complaints disposed of during the year.
- Number of cases pending for more than ninety days.
- Number of workshops or awareness program against sexual harassment carried out.
- Nature of action taken by the employer.

Annexure 1

DC – Internal Complaints Committee

Given below are the names and designations of the members of the **Internal Complaints Committee** nominated by the Management. The Chairperson of the committee is woman Director of Company - Mrs. Sneha Chotai.

Sr. No.	Name	Designation in Company	Designation in Committee
1	Ms. Sneha Chotai	Independent Director	Chair Person
2	Mr. Chetankumar Hasmukhlal Timbadia	Managing Director	Member
3	Mr. Viresh Badani	Assistant Manager HR & Admin	Member
4	Mrs. Taruna Sharma	Senior Executive Sales	Member

18.0 PROMOTION POLICY

- Objective of promotion policy is to ensure that high performance levels are recognized and rewarded.
- Employee has to complete a minimum of **15 months** in a particular role prior to being eligible for any kind of promotion.

18.01 Criteria For Evaluation:

- On basis of Performance Appraisal
- Education
- Punctuality
- Competencies
- Demonstrated ability to improve quality, productivity, cost and efficiency.
- Past Experience.

19.0 SEPARATION

Separation of an employee can happen owing to following reasons:

- Resignation
- Termination
- Retirement
- Death

19.01 Procedure

- Resignation
 - During probation
 - After Confirmation

On submission of resignation letter by any employee following procedure will be followed:

- HR department will circulate NO DUES FORM to concerned department and will obtain necessary declaration.
- An Exit Interviews by Cross Functional Head or HR is mandatory.
- Full and Final settlement of resigned employee shall be prepared by HR and cross verified by Accounts department.

- Resigned employee is expected to handover complete charge of his function to any other employee nominated by the management. He is also expected to return all company belongings viz. calculator, mobile phone, laptop, identity cards etc. before settling his account.
- No employee shall be allowed to avail any leave during the notice period i.e. from date of resignation to date of relieving. However, if he is required to take leave for any exigencies, his notice period will be extended by number of days equivalent to the leave availed. Alternatively, the same leave can be treated as shortfall in notice period and in lieu of which proportionate gross salary will be recovered from his full and final settlement of accounts.
- In special circumstances, management may allow adjustment of balance leaves (standing at the credit of resigned employee) against shortfall of notice on a written application made by the resigned employee.
- The full and final will be settled within TAT of **15 working days** for non-sales and **30 working days** for sales if there is no dues after the employee's last date at work.

20.0 MATERNITY LEAVE BENEFIT

Objective:

The Maternity Leave and Benefit policy intends to:

- Regulate the employment of women in the organization for certain period before and after child-birth.
- Provide maternity benefit.
- Ensure that the organization meets all obligations as mandated by the statutes of the state.

Applicability:

The female employees (Regular, Probationers and Trainees) of the organization.

Leave Benefit

Eligibility

- All female employees on confirmed employment who are not covered under the ESI Act, 1948 and have completed **180 days of continuous service** with the company are eligible for Maternity Leave.
- The maximum period for which any employee be entitled to maternity benefit shall be twelve weeks of which not more than six weeks shall precede the date of her ex delivery.
- Eligibility of benefit is restricted up to **two** surviving children only.

Regulations

- The applicant should inform about her pregnancy to the HR department minimum **2 months** in advance before proceeding on leave.
- The application should be supported by a medical certificate confirming the pregnancy and expected date of child birth.
- Maternity leave may be combined with accrued earned leave with prior approval.
- The applicant can avail six weeks leave before the date of delivery and six weeks leave post delivery. The maximum leave benefit under normal circumstances will be 12 weeks (3 months).
- Un-availed Maternity Leave is non-encashable.
- The weekly offs and holidays falling during this period will be part of the leaves availed.

Leave without pay

- Leave without Pay are approved leaves which can be sanctioned only when employee is medically un-fit and unable to resume her duties and also has availed leave. (leave for illness arising out of Pregnancy).
- In such cases, the employee shall produce a medical certificate stating the valid reason for such leaves.
- In normal circumstances, the benefit under this clause is limited to 4 weeks in addition to leaves provisioned under Maternity Leave Benefit.

Procedures & General Rules

- The leave application for availing “Leave without Pay”, shall be submitted minimum 2 weeks in advance. The sanctioning of leave under this clause is at the sole discretion of the sanctioning authority of the Company and should not be perceived as a right for entitlement.
- In normal circumstances, the employee should resume her duties post maternity benefit stipulated above; failing which the leave period will be treated as unauthorized leave. Consequently, disciplinary action will be initiated and no salary will be paid for these days.
- Leave deductions (Leave without pay and Notice Period) shall be calculated at the rate of gross payroll salary.

Special Mention: Resignations Post Maternity Benefit.

- If an employee wishes to exercise her option to resign her employment immediately after availing the leave with salary benefit under “Maternity” is accepted only on medical grounds. In such case, the reasons stated in the medical report will be mentioned in the relieving letter.

NOTE:

- I. The onus of timely submission of approved leave application forms to the HR department lies completely on the person and while processing the payroll no prior intimation will be sent to the defaulting individuals. Information regarding number of paid days will be mentioned in the pay slip of the month.
- II. Any exceptions would have to be approved by the relevant authority.

21.0 LONG SERVICE AWARD**21.01 Objective**

- The objective behind this policy is to recognize the long service of employees who have been with the company for more than **10 years**.
- An employee eligible for long service award will be given a memento and letter of appreciation from the Managing Director.

22.0 GRATUITY**Rules**

- Gratuity is calculated at the rate of 15 / 26 of a month's salary for every completed year of service or part thereof in excess of 6 months, subject to maximum of Rs. 20 Lacs.
- The maximum limit of Gratuity payable by the Company is as per Gratuity Act. In case an amount exceeding 20 Lacs is given it is taxable both for the employee.

23.0 RETIREMENT

- All employees on attaining the age of **60 years** will retire from the service of the company.
- At the discretion of the management, the extension of the service beyond the retirement age will be considered in exceptional cases for operational requirement. Such extension, if any, will not exceed one year at a time.
- All extension of service will require the prior approval of Managing Director.

23.01 Procedure

Every year in month of March a statement due for retirement in the next year is prepared by HR Department and it will be place before Managing Director, for consideration.

23.02 Intimation

All employees due for retirement will be intimated three months in advance regarding his date of retirement.