

## QUATION SOLUTIONS PVT LTD.

## COMPANY POLICIES 2024-2025

We would like to align our policy guidelines to the employee needs and those of the organization. Therefore, this policy shall be monitored on an ongoing basis, to understand and ensure that these policies that make up the Handbook are effective and serve the purpose. Quation Solutions Pvt. Ltd. may change these policies at any time upon review and in light of legislative or organizational changes. This handbook is, therefore, designed to allow updates and modifications as and when the management of QSPL deems necessary for the general benefit of Employees and the Company.

As we move ahead, there can be updates in the manual. The employees will receive these updates as and when they are made.

#### 1. INTRODUCTION TO THE EMPLOYEE HANDBOOK

This Handbook has been prepared by Quation Solutions Pvt. Ltd., (hereinafter referred to as the "Company" or "QSPL") to introduce to all employees, Company policies, the roles and responsibilities that employees are required to adhere to, and rules and regulations that govern the employees of the Company. This Handbook provides important information and guidelines to create and foster a safe and healthy work environment.

While it is impossible to foresee every situation that may arise in the workplace, this Handbook tries to provide answers to questions and circumstances that normally arise in the course of work and interaction between employees among themselves and with management. It is therefore only logical that the Company make efforts to ensure that employees' concerns are addressed and resolved. Towards this end, the Company reserves its right to modify, alter, rescind, or revise any provision of this Handbook from time to time, at its sole discretion, with or without notice to employees.

The purpose of this Handbook is to provide all employees with a ready reference in respect of their roles, responsibilities, rights, and obligations in the Company. Employees are encouraged to approach the relevant authorities in case of any clarifications that they may require.

References to forms and other documents in Annexures are for convenience for the reader.

## 2. COMPANY PHILOSOPHY

## 2.1 OPEN DOOR POLICY

The Company encourages all employees to speak freely with the management with respect to any work-related concerns, issues, and collaboration. Employees are urged to contact the



Company management in respect of any aspect relating to work that you believe is important and in respect of which you have ideas and recommendations to make. Every effort shall be made to take and implement these ideas and recommendations and resolve any concerns.

#### 2.2 EQUAL EMPLOYMENT OPPORTUNITIES.

Quation Solutions Pvt. Ltd. is an equal opportunity employer; it does not discriminate based on age, sex, caste, class, sexual orientation, race, religion, national origin, disability, or marital status. This applies in the case of employment, recruitment, selection, compensation, benefits, promotion, demotion, layoff, termination, and all other terms and conditions of employment.

Employees are directed to bring any violation of this policy to the immediate attention of their supervisor or Head - of HR. Any employee who violates this policy or knowingly retaliates against an employee reporting or complaining of a violation of this policy shall be subject to immediate disciplinary action, up to and including termination. Complaints brought under this policy will be promptly investigated and handled with due regard for the privacy and respect of all involved.

## 2.3 POLICY FOR THE PREVENTION OF HARASSMENT AT THE WORKPLACE.

The Company considers it to be its utmost priority to ensure that no employee is harassed or intimidated by colleagues irrespective of their designation. Harassment and intimidation on any basis, including race, religion, gender, age, caste, class, disability, marital status, or sexual orientation is illegal and prohibited. Employees should be aware and mindful that their relationship with their colleagues and the Company should be based on mutual respect and civility. Thus, a hostile work environment, sexual harassment, and acts that discriminate shall be dealt with, with swift action and disciplinary proceedings upon receipt of a complaint in this regard. Needless to say, employees are encouraged to report any instance of harassment without any delay so that they can be addressed and resolved, according to extant law.

#### 2.4 GRADE STRUCTURE

The grade structure applicable to all employees on rolls of the Company is as follows:

Grade	Designation	
10	CXO	
9	SVP - Senior Vice President	
8	VP - Vice President	
7	AVP - Associate Vice President	



6	Senior Manager
5	Manager
4	Associate Manager
3	Senior Consultant
2	Consultant
1	Intern

## 2.5 HIRING AND JOINING

## 2.6 JOINING PROCESS

This section provides for certain processes that the Human Resources, Administration, Line Manager, and IT Department should comply with so that an employee who has been hired is provided with all necessary facilities and settles in comfortably. The Company's HR department will document relevant data or information in respect of each employee of the Company.

#### 3. ROLE AND RESPONSIBILITIES OF THE HUMAN RESOURCES TEAM

I: Three days before the date on which the newly hired employee starts working with the Company, the HR shall ensure that the Employee submits the following documents to the Company, including:

- Certificates supporting academic/professional qualifications, from SSL/10<sup>th</sup> Standard Certificate until graduation. Academic/professional qualifications including all Diplomas/PG Diploma earned, and any other certification courses completed that are relevant. All Certificates shall be accompanied by a copy of the respective Marks Sheets.
- Latest salary pay slip/Salary Certificate.
- Service Certificate (Relief letter and experience letter) and/or Proof of Employment issued by all previous employers.
- Form 16 *or* Taxable Income Statement duly certified by the immediate previous employer. (Statement showing the deductions & Taxable Income with break-up)
- A complete copy of the valid Passport (i.e., inclusive of all blank pages) *or* if a Passport has been applied for, a copy of the acknowledgment of application received from the Passport authorities.
- Photocopy of the PAN Card (if applicable)
- Photocopy of the Aadhar Card (Proof of Age)
- Universal Account Number



II: Upon receipt of the documents mentioned above, the HR team shall issue to the employee the Letter of Employment along with the following forms and documents, for information and records:

- Offer Letter.
- Acceptance of Code of Conduct (Note: See Section 6.8 of this Handbook).6.9 Acknowledgment of receipt of employee handbook and commitment to comply with the laid policies in the handbook.
- Agreement of non-disclosure.
- Authorization letter for background verification.
- Declaration of Relative(s) (defined under Section 4.3 below) working in Quation, if applicable. The declaration by the individual concerned, at the time of commencement of employment, shall be provided in the Personal Profile form (noted below in Sl. No. "i" below).
- ESIC form.
- PF Nomination form.
- Gratuity Nomination form.

On the first day of work of the employee, the HR shall introduce the employee to the Line Manager, as well as the Administration Department (so that adequate arrangements are made for seating, arrangement of phone instrument, and preparation of the Joining Kit.) and the IT Department (for provision of Desktop or Laptop, as the case may be). HR shall also coordinate with the employees and arrange for ID cards, visiting cards, and salary account opening formalities.

#### 3.1 MAINTAINING PERSONNEL RECORDS

Employees are responsible for providing current information regarding their address, telephone number, insurance beneficiaries, change in dependents, marital status, etc. In case of any changes on the above information post joining formalities employees are mandated to update in the HRMS portal. Changes in exemptions for tax purposes will only be made upon the receipt of a completed IT Declaration form.

#### 3.2 POLICY ON HIRING OF RELATIVES

"Relative" for this Handbook shall follow the definition under Section 6 of the Companies Act, 2013. A person shall be deemed to be a relative of another, if, and only if: (a) they are members of a Hindu undivided family; or (b) they are husband and wife; or (c) the one is related to the other in the manner indicated in

Schedule IA (as under) 1. Father. 2. Mother (including stepmother). 3. Son (including stepson). 4. Son's wife. 5. Daughter (including stepdaughter). 6. Father's father. 7. Father's mother. 8. Mother's mother. 9. Mother's father. 10. Son's son. 11. Son's son's wife. 12. Son's daughter.



13. Son's daughter's husband. 14. Daughter's husband. 15. Daughter's son. 16. Daughter's son's wife. 17. Daughter's daughter. 18. Daughter's husband. 19. Brother (including stepbrother). 20. Brother's wife. 21. Sister (including stepsister). 22. Sister's husband.

The Company believes in and encourages merit-based hiring and employment. This policy therefore intends to ensure that employees who may be related to another in the Company are given roles, responsibilities and designation that will not influence the employment, performance or career progression of one another. Thus, while the Company does not bar the hiring of individuals who may be related to an existing employee in Quation, it endeavors to ensure the absence of potential conflict of interest.

Thus, to reduce the possibility of favoritism or appearance of favoritism, an employee shall not be assigned to a position where he/she has the opportunity or responsibility to check, process, review, approve, audit or otherwise supervise the work of the other related employee or influence the salary progress or promotion of the related employee.

The HR department has been entrusted with the responsibility of maintaining relevant data in respect of related employees. All employees hired are required to declare any relationship they may have with an existing employee and the nature of such a relationship.

In case an employee knows or becomes aware of a situation that appears to be an opportunity for one employee to show favoritism to his/her relative, he/she is required to bring such a situation to the attention of QSPL HR.

#### 4. EMPLOYEE REFERRAL PROGRAM POLICY

The Companies Employee Referral Program Policy explains important aspects of our employee referral procedures. We place great importance on referrals because we trust our employees know what Is best for the company. We have made this process as smooth as possible for our employees and those whom they refer.

Employees are encouraged to refer any person/prospective candidate to the Company should the Employee think the person would be a good fit for a position at the Company.

While referring to a candidate, employees are advised to confine the referrals they make to people whom they know personally viz. Friends, Family, and acquaintances. Employees should refrain from referring candidates that are not known to them or are randomly sourced from institutions, social media sites, etc.,

Employees should mention their relationship (how they know the candidate) with the candidate while referring to the candidate.

If the Company hires the candidate referred by the Employee, that Employee shall receive a bonus in the following manner:

Candidate with 0 years experience (Fresher) – INR 15,000.00 Candidate with 2 – 5 years experience – INR 25,000.00 Candidate with 5+ years' experience – INR 50,000.00



Referring employees shall not be involved in the interview process/decision-making/final decision in respect of the candidate. Referring employees involved in the interview process/final decision process shall not be eligible for the bonus.

Reference bonus shall be paid out after 3 (three) months from the date of hiring of the candidate as a full-time employee.

In the case of interns who are recommended/referred as prospective candidates for employment by an existing employee, the referral bonus shall be provided 3 months after the intern(s) are confirmed as full-time employees.

There is no cap on the number of referrals an employee can make. If two or more employees refer to the same candidate, only the first referring Employee shall receive the referral bonus. Referrers are eligible for a bonus even if a candidate is hired later (within 3 months) or gets hired for another position.

The employee referral program policy is applicable only for referrals made for prospective employees. It does not extend to any institution companies or bodies introduced to Quation.

In all decisions regarding the eligibility of an employee for a referral bonus, the final decision is the Recruitment Head. His decision is binding on the referring employee.

#### **4.1 PROBATION AND CONFIRMATION**

All employees newly hired by the Company are evaluated in a specific notified timeframe for "performance and culture fit" vis-à-vis internal set standards, so that both QSPL and the employee can mutually determine compatibility with the organization. This includes the Code of Conduct (please see Section 6.9 of this Handbook) and performance appraisal by the Line Manager (Please see Section 7 of this Handbook) before making employment from probationary to permanent. As a standard practice, all new joiners shall serve a mandatory probation period of 6 (six) months.

#### 5. WORK ENVIRONMENT

#### 5.1 EMPLOYMENT ON AN ON-WILL BASIS

All employees of the company, regardless of their classification or position, are employed on an at-will basis. This means that each employee's employment is terminable at the will of the employee or the company at any time, with or without cause and with or without notice. No officer, agent, representative, or employee of the company has any authority to enter into any agreement with any employee or applicant for employment other than on an at-will basis. Furthermore, nothing contained in the policies, procedures, handbooks, manuals, job



descriptions, application for employment, or any other document of the company shall in any way create an express or implied contract of employment or an employment relationship other than on an at-will basis.

#### 5.2 WORKING HOURS AND OVERTIME

All employees are requested to follow the 10.30 AM to 7.30 PM work, Monday to Friday schedule. The working hours are designed to meet and exceed customer requirements. Employees are entitled to a lunch break of 1 (one) hour during business hours.

Occasionally it may be necessary for an employee to work beyond his or her normal workday hours.

Employees are requested to follow the schedule of 6:00 PM to 3:00 AM who are categorized for US sales.

## 5.3 PAY PERIOD AND PAYDAY

The pay period commences on the 1st day of every month and ends on the last day of the month. All Employees are required to open a Savings Bank account in the bank designated by it. Until the Employee sets up such an account, the Company shall make payment via cheque. All Employees are encouraged to open a bank account in the bank designated by it, without any delay. Employees are mandated to have a bank account opened within months of joining.

## 6. STANDARDS AND EXPECTATIONS AT THE WORKPLACE

## 6.1 **SAFETY**

The company believes in maintaining safe and healthy working conditions for our employees. However, to achieve our goal of providing a safe workplace, each employee must be safety conscious. We have established the following policies and procedures that allow us to provide safe and healthy working conditions. We expect each employee to follow these policies and procedures, to act safely, and to report unsafe conditions to his or her supervisor promptly.

## 6.2 CARE OF EQUIPMENT AND SUPPLIES

All employees are expected to take care of all equipment and supplies, including but not limited to, company-issued phones, laptops, tablets, pen-drives, external hard- drives, and any other electronic equipment, chairs, desks, storage cabinets and areas, pantry/kitchen, copying and printing machines, facsimile machines ("Company Equipment") provided to them. You are responsible for maintaining the Company Equipment in proper working.



condition and for promptly reporting any unsafe or improper functioning to your supervisor. Neglect, theft, and/or destruction of the Company's Equipment are grounds for disciplinary action, up to and including termination.

The Company reserves the right, always and without further notice, to inspect and search all Company property to determine whether this policy or any other policy of the Company has been violated, or when an inspection and investigation is necessary for purposes of promoting safety in the workplace or compliance with laws. These inspections may be conducted during or outside of business hours and in the presence or absence of the affected Employee.

To protect the Company's legitimate business interests, the Company reserves the right to question and inspect or search for any employee or other individual entering or leaving Company premises, with or without notice. The inspection or search may include any packages or items that the individual may be carrying, including briefcases, handbags, knapsacks, shopping bags, et cetera. The individual may be requested to display the contents of any packages and/or turn out his or her pockets etcetera, in the presence of a senior employee of the Company, typically a management employee of the same gender.

#### **6.3 INTERNET USAGE POLICY**

The Company employees are advised to use the company's internet connection only for official reasons, including completing their duties and seeking out information that they can use to improve their work.

While the Company does not intend to restrict employees' access to websites of their choice, it requires and expects that employees exercise good judgment and prudence to ensure that productivity is not harmed at the expense of browsing and/or use of the internet.

Any use of the Company network and internet connection must follow Confidentiality (See Section 8 of this Handbook) norms. In particular, the Company policy requires that Employees should:

- Keep their passwords secret always.
- Log into their corporate accounts only from safe devices.
- Use strong passwords to log into work-related websites and services.

### Inappropriate employee internet usage

Employees are not to use the Company network to:

- Download or upload obscene, offensive, or illegal material.
- Send confidential information to unauthorized recipients.
- Invade another person's privacy and sensitive information.



- Download or upload movies, music, and other copyrighted material and software.
- Visit potentially dangerous websites that can compromise the safety of the company network and computers.
- Perform unauthorized or illegal actions, including but not limited to hacking, fraud, buying/selling illegal goods, and more.

Employees are also advised to be careful when downloading and opening/executing files and software. If unsure of the safety of a file, an Employee should ask their Supervisor/ IT manager/ etc., for assistance.

The Company may install anti-virus and disk encryption software on Company computers. Employees are required not to deactivate or configure settings and firewalls without managerial approval and knowledge.

The Company does not assume any responsibility if employee devices are infected by malicious software, or if their data is compromised because of inappropriate employee use.

#### **Email**

Employees are permitted to use their corporate email accounts for both work-related and personal purposes as long as such use does not violate Company policy. In particular, Employees are discouraged from using their Corporate email accounts to:

- Register on illegal, unsafe, disreputable, or suspect websites and services.
- Send obscene, offensive, or discriminatory messages and content.
- Send unauthorized advertisements or solicitation emails.
- Sign up for a competitor's services unless authorized.

The Company reserves the right to monitor corporate emails of all those who are issued with a corporate email address as well as websites that employees may visit on Company Equipment.

#### 6.4 SMOKING AT THE WORKPLACE

The company's policy is to provide smoke-free environments for our employees, customers, and the public. Smoking of any kind is prohibited inside our office and on our work sites. Employees may smoke on scheduled breaks or during mealtimes, as long as they do so outside the worksite or office. Employees who take excessive smoke breaks may be required to work longer hours to make up for time lost smoking. Employees are also responsible for informing all those working on our job sites of this smoke-free policy and reporting to their supervisor any violation of this policy.

## 6.5 DRUG FREE WORKPLACE



The company does not tolerate the presence of illegal drugs or the illegal use of legal drugs in our workplace. The use, possession, distribution, or sale of controlled substances such as drugs or alcohol or being under the influence of such controlled substances is strictly prohibited while on duty, while on the company's premises or worksites, or while operating the company's equipment or vehicles. The use of illegal drugs as well as the illegal use of legal drugs is a threat to us all because it promotes problems with safety, customer service, productivity, and our ability to survive and prosper as a business. If you need to take a prescription drug that affects your ability to perform your job duties, you are required to discuss possible accommodations with your supervisor. Violation of this policy will result in disciplinary action, up to and including termination.

Any employee who is convicted of offenses under the Narcotic Drugs & Psychotropic Substances Act, 1985, or any other related legislation must notify an appropriate officer or senior official of the company of that conviction within five days of the conviction. Failure to do so may lead to disciplinary action.

#### 6.6 APPEARANCE AND DRESS

To project and present a business-like, professional image to our clients and the public, all employees are required to wear appropriate clothing on the job. The following dress code has been prescribed for all employees of the company.

Men are required to follow formal attires/business casuals on weekdays between Monday and Thursday. Smart Casuals are permitted on Friday.

Women are required to be formally dressed during weekdays and smart casual attires are permitted on Friday.

## 6.7 CONFLICT OF INTEREST

Employees are required to avoid external business, financial, or employment interests that conflict with QSPL's business interests or with their ability to perform their job duties. This applies to Employees' possible relationships with any other employer, consultant, contractor, customer, or supplier.

Violations of this rule may lead to disciplinary action, up to and including termination.

## 6.8 CODE OF CONDUCT

The Company's Code of Conduct expects Employees to follow certain rules of ethics and conduct that are based on integrity, respect, and professionalism. The company expects Employees to present himself or herself professionally. QSPL shall not encourage or tolerate any Employee acting in a manner that is not considerate of others or fails to observe reasonable rules of ethics.



Disciplinary action against such an Employee shall follow for failure to adhere to the Code of Conduct, upon a complaint or information received or Suo moto, i.e., when an Employee is found to have acted in violation of this Code of Conduct.

Depending on the severity or frequency of the disciplinary problem, a verbal or written reprimand, suspension without pay, disciplinary probation, or discharge may be necessary. It is within the company's sole discretion to select the appropriate disciplinary action to be taken. Notwithstanding the availability of the various disciplinary options, the company reserves the right to terminate an Employee at its discretion, with or without notice.

If an Employee is faced with and is unsure how to handle a situation that he/she believes has the potential to violate this Code of Conduct, the Employee should notify his/her supervisor or the HR Department.

The following is not a complete list of offenses for which an employee may be subject to discipline, but it is illustrative of those offenses that may result in immediate discipline, up to and including dismissal, for a single offense:

- Excessive absenteeism or tardiness.
- Dishonesty, including falsification of Company-related documents, and/ or
  - misrepresentation of any fact.
- Writing offensive, abusive, and/or threatening email(s) or communication to employees, customers, colleagues, or partners.
- Fighting, disorderly conduct, horseplay, or any other behavior which is dangerous or disruptive.
- Possession of, consumption of, or being under the influence of alcoholic beverages while on Company or customer premises or Company business.
- Illegal manufacture, distribution, dispensation, sale, possession, or use of illegal drugs or un-prescribed controlled substances.
- Reporting for work with illegal drugs or un-prescribed controlled substances in your body.
- Possession of weapons, firearms, ammunition, explosives, or fireworks on company or customer premises.
- Failure to promptly report a workplace injury or accident involving any of the company's employees, clients, equipment, or property.
- Willful neglect of safety practices, rules, and policies.
- Speeding or reckless driving on Company business.
- Commission of a crime, or other conduct which may damage the reputation of the Company.
- Use of profane language while on Company business.
- Stealing, misappropriating, or intentionally damaging property belonging to the Company or its customers or employees.
- Using the Company's internet connection to steal or engage in other illegal activities.
- · Causing Company computers to be infected by viruses, worms, or other malicious



#### software.

- Withholding Company property despite formal communication for its return.
- Unauthorized use of the Company's or its clients' name, logo, funds, equipment, vehicles, or property.
- Insubordination, including failure to comply with any work assignments or instructions given by any Company supervisor with the authority to do so.
- Violation of the Company's Equal Employment Opportunity Policy, Harassment Policy, or Prevention of Sexual Harassment Policy.
- Interference with the work performance of other employees.
- Failure to cooperate with an internal investigation, including, but not limited to, investigations of violations of these work rules.
- Failure to maintain the confidentiality of trade secrets or other confidential information belonging to the Company or its customers.
- Failure to comply with the personnel policies and rules of the Company.
- Committing acts and omissions that amount to conflict of interest, including Soliciting anything of value from any person or organization with whom the company has a current or potential business relationship.
- Accepting any item of value from any party in exchange for or in connection with a business transaction between the company and that other party.
- Accepting gifts from clients or others in response to solicitation on the Employee's part and for exchange for business purposes.

The Conduct and Discipline Policy in Section 14 of this Employee Handbook lays down the mechanism that has been adopted by the Company and may be referred.

#### 6.9 PERSONAL CALLS, VISITS AND BUSINESS

The company expects the full attention of its employees while they are working. Although employees may occasionally have to take care of personal matters during the workday, employees should try to conduct such personal business either before or after the workday or during breaks or meal periods.

Employees should also limit incoming personal calls, visits, or personal transactions.

#### 6.10 BUSINESS EXPENSES

Employees may occasionally incur expenses on behalf of the Company. The company will reimburse employees for typical business expenses, such as mileage (for example, when the Company asks an employee to travel to a different job site during the workday) and certain job-related supplies or materials. The company will pay mileage reimbursements at the end of each month, upon receipt of the employee's mileage record along with the completed Reimbursement Form

To be reimbursed for job-related supplies or materials, employees must deliver a receipt for the supplies or materials attached to the Reimbursement Form to the Finance Department after the approval of the Manager.



## 6.11 Reimbursement Policy

The following procedure is envisaged for reimbursements to be processed by the Company. The Process entails:

An employee seeking reimbursement is mandated to get approval from the respective reporting manager priorly and shall submit the *Reimbursement Form* along with supporting bills to the Finance Department. The Reporting Manager shall verify the Project Code and relevant documents before approving reimbursements.

A Reimbursement Form without a project code shall not be accepted.

Bills older than a month shall not be accepted.

#### Cab Reimbursement

All the employees are eligible to avail reimbursements for travel by cab/ taxi if an employee leaves office premises after 9.00 pm.

During office working schedules if the cabs are used for official purposes, an employee can furnish the necessary bills for reimbursement.

#### **Food Reimbursement**

All employees are eligible for food reimbursement if they order food only on the office premises from outside after 8:00 pm.

One employee may submit a consolidated bill for food delivered for more than one employee in the office premises. Employees are to ensure that the names of all employees for whom such food was ordered are mentioned in the *Reimbursement Form*.

A single employee can order food for up to Rs. 300 per person.

#### **Business Expense**

Any item purchased for the company's business use via personal transaction can be reimbursed on the manager's approval.

Personal Vehicle usage for business-related visits

The Company shall reimburse fuel expenses incurred with the use of a personal vehicle for business-related visits.

In the case of a four-wheeler, Rs.12.00 (Rupees Twelve, only) per kilometer and Rs.2.50



(Two Rupees and Fifty Paise only) per km for a two-wheeler shall be reimbursed.

The *Reimbursement Form shall include details of the* starting point, destination distance traveled, and the purpose of the visit.

#### 6.12 EMPLOYEE SOFT LOAN POLICY

#### **Background**

Employee Soft Loan Policy affords an avenue for financial assistance in the form of advance that an employee may take from the Company. It acts as additional financial support to employees in case of any emergencies or unexpected financial crises.

This policy is valid till 31st March 2025 and is subject to change as decided by the Company.

#### **Purpose**

The Company makes available to its employees an emergency loan program. The purpose of this program is to provide loans to employees who have an immediate need for funds as a result of any medical emergency and have no other source of money available within the time necessary to act. The program is not intended to compete with local credit unions or other lending institutions. It is intended to fill the immediate emergency medical needs of company employees that are not being met by those sources.

## Benefits of offering employee loan

By offering loans to employees, we are helping our employees reduce their financial stress during emergencies.

## Eligibility

All regular full-time employees are eligible to apply for a loan after the completion of one year of active employment.

All full-time employees will be eligible for a maximum interest-free loan up to a maximum of INR 1,00,000/-

The loan amount should not exceed an employee's 3 months take home salary (Post Tax).

An emergency is defined as an expense such as:

- Medical emergency
- Marriage
- Childcare
- Parent Care

HR will assess the requirement in detail and the CEO will decide whether to advance the loan.



#### Terms & conditions of loan

**Tenor of loan:** The maximum loan repayment period is twelve months.

**Interest Rate:** Interest-free loan

Security: None

<u>Application of payment:</u> Employees can avail of this loan multiple times provided there are no outstanding ones.

<u>Payment method:</u> Repayment of an emergency loan must be made through a monthly payroll deduction. The deduction of installments from salary will start from the month following the disbursement of the loan.

**<u>Pre-payment:</u>** No penalty will be charged for pre-payment.

<u>Employment termination</u>: All loans are due and payable in full upon termination of employment with Quation.

Procedure for Obtaining an Employee Emergency Loan

An employee intending to apply for a loan from the Company may contact the HR Department for any further information.

Relevant necessary documentation is to be furnished to the HR department before approval of the loan

#### 6.10 INSPECTION OF PERSONAL AND COMPANY PROPERTY

The company's employees use property and equipment the company owns and provides, and may also use the company's materials, information, and other supplies. While employees may decorate their office workspaces with their possessions (such as pictures, plants, and the like), employees must remember that property supplied by the company remains the property of the company. The company reserves the right to search any Company property (e.g., personal computers, desks, lockers, or other storage areas) at any time. The company also reserves the right to inspect personal property (e.g., toolboxes, purses, briefcases) during the workday or as employees leave their worksites. Refusal to allow inspection may lead to disciplinary action, up to and including termination.

#### 6.11 CONFIDENTIALITY AND NON-DISCLOSURE



The Company considers its confidential and proprietary information, including the confidential and proprietary information of its clients, to be one of its most valuable assets. As a result, Employees must carefully protect and must not disclose to any third party all confidential and proprietary information belonging to the Company or its clients. Such protected information includes but is not limited to, the following: matters of a technical nature, such as computer software, product sources, product research, and designs; and matters of a business nature, such as client lists, client contact information, associate information, on-site program, and support materials, candidate and recruit lists and information, personnel information, placement information, pricing lists, training programs, contracts, sales reports, sales, financial and marketing data, systems, forms, methods, procedures, and analyses, and any other proprietary information, whether communicated orally or in the documentary, computerized or another tangible form, concerning the Company's or its client's operations and business.

Employees should ensure that any materials containing confidential or proprietary information are filed and/or locked up before leaving their work areas each day. During the workday, employees should not leave any sensitive information lying about or unguarded.

Employees are required to consult with their Line Manager, HR, or the CEO for any questions that they may have in this regard.

#### 6.12 RE-EMPLOYMENT

Former employees who are rehired and return to work within three months of their termination will not be required to go through another orientation period unless the company deems it necessary. Former employees who are rehired and return to work more than three months after their termination will be rehired only as new employees and must complete a new orientation period. They will be considered new employees for any benefits. As a rule, the company will not rehire former employees who:

- Were dismissed by the company; or
- Have absconded; or
- Had a poor attendance record; or
- Had a below-average evaluation; or
- Has Violated the Code of Conduct; or

#### 6.13 MOONLIGHTING

The company discourages our employees from taking on additional outside work. Employees who wish to take on outside work must first obtain permission from the Vertical Head and management. Work requirements for the company, including overtime, must take precedence over any outside employment.

The company will not permit any employee to take outside work with a company in the



same or related business as the company, or which is in any way a competitor of the company.

If the company permits an employee to take outside work, the employee must report to his or her supervisor when the outside job has started. If, because of this moonlighting, the employee is unable to work when requested by the company, including overtime, or is unable to maintain a high work performance level at the company, permission to work at the outside job may be rescinded, or the employee may be subject to dismissal.

Employees are not permitted to work for any client of the company outside of the regular working hours as described above, without the express approval of the Vertical Head and/or Management.

The company will not pay medical benefits for injuries or sickness resulting from employment by any employer other than the company.

## **6.14 TERMINATION OF EMPLOYMENT**

QSPL provides a seamless, efficient, and effective system in case of resignation or termination of an Employee. An Employee of QSPL may resign or be terminated from employment of QSPL. This section provides the process involved in such a case.

#### **RESIGNATION BY EMPLOYEE**

An Employee desiring to resign from QSPL shall submit to his/her immediate Supervisor and the HR Department a letter of resignation, including by e-mail, and serve the requisite notice period as per the terms of his/her employment.

The Company requires employees to service a notice period of 60 days.

## WAIVER OF NOTICE PERIOD

Employees must note that there may be instances where the Company may, at its discretion, mandate that an employee serves either partial or the entire notice period. In other words, an employee opting to not serve the notice period as required, and instead pay compensation to the Company instead of the notice period is entirely at the discretion of the Company and is binding on the outgoing employee.

In case of the Employee requesting early release and waiver of the notice period or in case of leaves being taken during the notice period, the Company also reserves the right to impose the condition requiring the Employee to pay back an amount equivalent to the unserved notice period.

However, in the event the Employee's services are terminated on account of fraud, theft, or withholding of information or for any other form of misconduct, no compensation instead of the waiver of the notice period shall be payable.



The decision by the Company in respect of any of the above-mentioned scenarios is final and binding and shall not be called into question.

#### LAST WORKING DAY

Upon accepting the letter of resignation, the Manager shall specify the last working day of the employee and forward the same to QSPL HR.

QSPL HR is mandated to send a No Due checklist to the Employee who in turn, is required to obtain relevant clearances from the Finance Department, the Line Manager, and the HR Department in respect of the return of any Company property. This *No Due Certificate* is required to be submitted to the HR Department on his/her last working day.

Before the Employee's separation from the Company, an exit interview shall be conducted by the HR Department, and feedback documented.

#### TERMINATION OF EMPLOYMENT BY THE COMPANY

The Company follows an At-Will employment policy, as described in Section 5.1 of this Handbook. The Company may, therefore, at any time, either with or without cause, terminate the services of an employee.

The Company may also decide to terminate the services of an employee for cause, resulting from any disciplinary action for reasons and circumstances detailed in Sections 13 and14 of this Handbook, as the case maybe

Employees may note that in case of termination of employment by the Company without notice, the Company, at its discretion may waive the notice period instead of payment of two months' salary to the terminated employee. In case of termination of employment upon any inquiry and/or disciplinary proceedings that may be concluded against the employee, the Company shall not pay the two months' salary, upon termination.

As a part of the exit terms and conditions, for 6 months immediately following your exit from Quation you will not be engaged or employed with any of The Company's (Quation Solutions Private Limited) clients.

#### **6.15 EXIT PROCEDURE**

An Employee intending to resign from the Company is required to serve the notice period as mentioned in the offer letter. Failure to serve the notice period shall entail the employee having to pay the company an amount equivalent to the unserved notice period. The company reserves the right to extend the notice period if the employee goes on leave during the notice period.



During the notice period, the employee is expected to ensure a smooth handover of his/her current responsibilities. The employee shall ensure that the data backup is also handed over to the team. Employees should be aware that if an employee resigns from the Company before completion of the minimum period of service as indicated in their offer letter/contract of employment, the Company, at its discretion, shall require that the Employee pay back the Joining Bonus cum Retention Bonus, before the last working day. The transfer of the Joining Bonus cum Retention Bonus amount shall be made to the following Bank Account of the company:

Bank name: ICICI Bank

Account number: 233005001563 IFSC

**Code:** ICIC0002330

Irrespective of whether the Employee has resigned or been terminated, on the last working day, the Employee shall return the assets given by the company, including Laptop, laptop bag, laptop charger, mouse, ID card, medical insurance card, etc. On the last working day, the login credentials of the employee shall be disabled.

Employees who have resigned from their services will have an exit interview with a representative from the Human Resources Department. Exit interviews provide an opportunity for departing employees to discuss their reasons for leaving. This information is useful in identifying trends, learning & development, and evaluating the effectiveness of current practices.

Employees will need to submit a *No Due Certificate* (issued by the HR department) on the last working day.

Relieving documents shall be given after two weeks from the last working day. Full and final settlement shall be processed within 45 days from the last working day. Employees are to note that relieving documents and the full and final settlement are subject to the Employee complying with all conditions stipulated in this Exit policy.

Relieving documents will be issued to the employee upon confirmation that there are no outstanding dues the employee has towards the company.

## 7. EMPLOYEE PERFORMANCE MANAGEMENT PROCESS INTRODUCTION

QSPL's Performance Management Process aims to ensure that the work performance and training needs of every Employee are managed effectively and fairly. While this policy applies to all Employees of QSPL, there may be some cases where the process is amended so that it is appropriate to the role.

#### The Process



A performance appraisal allows individual employees and their manager to review performance, work content, loads, and volume, to look back on what has been achieved during the past year so that future goals may be arrived at. It is also the time an Employee can decide on personal objectives, including any skills development. The appraisal system is designed to be a positive process, raise the quality of services provided by motivating Employees, increase job satisfaction, and identify appropriate training and development requirements.

Employees should note that the performance appraisal process is confidential, with only ratings disclosed to the Employee.

#### The aims of the Employee Performance Management Process

QSPL recognizes that Employees perform most effectively when they have clear expectations of their job role and purpose, their targets or objectives, and the wider aims of the Company. The policy aims to ensure that Employees:

- Know the standard of performance expected of them.
- Receive feedback to improve and develop performance and recognize their achievements.
- Identify areas of improvement and training and development needs.
- Have a mutually agreed plan to achieve both Company development goals and employee career development.

## **Roles and Responsibilities**

QSPL is responsible for:

- Setting sustainable standards.
- Providing advice and guidance to Managers on implementing the policy.
- Ensuring that appropriate training and development is available for managers and Employees.
- Holding an appraisal meeting and an appraisal review each year.
- Appraising Employees fairly and objectively against agreed objectives and action plans.
- Following up on actions arising from appraisals.
- Ensuring that a written record of the appraisal meetings is completed.
- Informing Employees how the appraisal scheme works and how it will affect them.

## Managers are responsible for:

- Ensuring each team member is aware of Key Result Areas (KRAs) and Goals.
- Ensuring that new Employees are aware of work targets and objectives identified as part of Business induction.
- Meeting Employees every quarter to review progress.



#### Employees are responsible for:

Taking an active role in reviewing their performance appraisal and target setting.

Eligibility: All employees who have joined the company on or before 30<sup>th</sup> September of that financial year.

## **Appraisal Process Appraisal cycle**

The appraisal cycle shall be in the April – March period and there will be a Quarterly Review.

#### Self-assessment

Employees must be informed of the appraisal at least 2 (two) weeks before the appraisal one-to-one meeting. A copy of the *Self Appraisal Form* should be given to the Employee, so the Employee has an opportunity to contribute. A copy of the completed S*elf Appraisal Form* should be returned to the Manager, 1 (one) week before the appraisal one-to-one meeting.

#### **Appraisal Performance**

Upon receiving the completed *Self Appraisal Forms* from the team members, the Manager shall appraise the team members and the same shall be shared with respective Employees.

#### The one-to-one meeting

An appraisal meeting is held one-on-one between the Employee and Manager, thus ensuring confidentiality. Sufficient time shall be allocated so that the meeting serves its purpose of well-considered and unhurried discussion, that benefits both the Employee and the Manager.

These meetings are intended to discuss the appraisals given by the Manager and the goals set. In case the Employee does not agree with the appraisal ratings, Skip Level meetings are required to be arranged.

The responsibility to schedule Skip Level meetings is with the Employee.

The purpose of Skip Level meeting(s) is to discuss why there are disagreements with the appraisal ratings and allow the opportunity to make changes if found suitable to the existing appraisal reports. Decisions taken in the Skip Level meetings are final and binding on the Employee.

#### Non-Compliance

All Employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should Employees feel apprehensive about their safety regarding addressing any breach, they should seek senior management support. Failure to comply with this policy may lead to a lack of clarity over job role, learning needs, or expected standards of performance, resulting in reduced effectiveness or efficiency,



underperformance and putting service delivery at risk. Any Employee refusing to observe the policy will be liable to disciplinary action by QSPL's Disciplinary Policy up to and including dismissal.

#### Implementation of the Policy

Overall responsibility for policy implementation and review rests with QSPL's senior management. However, all Employees are required to adhere to and support the implementation of the policy. QSPL will inform all existing Employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to QSPL.

## 8. NETWORK AND ELECTRONIC RESOURCES POLICY

Networks and Electronic Resources, such as computers, other hardware, software (including Office 365, LinkedIn, and any other platforms that the Company uses for business purposes), email, landline, and cellular telephones, fax machines, and internet access, are tools that the Company provides its employees to assist them in their work. These Network and Electronic Resources and related access systems are proprietary Company property and subject to review or access by the Company at any time.

All Employees who use the Company's Network and Electronic Resources must use Network and Electronic Resources for Company business purposes only.

Messages and communications sent via the Company's Network and Electronic Resources are subject to access by persons outside the Company and may be used in legal proceedings. Please consider this before sending any confidential messages or material via the Network and Electronic Resources.

Remember that all the Company's policies, including but not limited to policies on Equal Employment Opportunity, Harassment, Confidentiality, and Code of Conduct, apply to the use of the Company's Network and Electronic Resources. Employees must <u>not</u> review or forward sexually explicit, profane, or otherwise unprofessional or unlawful material through the Company's Network and Electronic Resources.

The super administration rights to the Company's Network and Electronic Resources are periodically modified to maintain the security of these Resources. In case of any queries that you may have, please contact HR.

Do not install any software or program on any Company computer or other hardware without the express consent of employees in charge of IT management. If in doubt, please contact your manager.

The company expressly prohibits the unauthorized use, installation, copying, or distribution of copyrighted, trademarked, or patented material.



Employees must not attempt to override or evade any program or measure installed by the Company to protect the security or limit the use of its Network and Electronic Resources.

The Company retains the right to review all communications conducted and data saved, reviewed, or accessed via the Company's Network and Electronic Resources, including Company computers, e-mail, and internet access. Inappropriate use of Network and Electronic Resources may result in disciplinary action, up to and including termination. Employees should be careful to safeguard their passwords, log off their terminals when not in use, and not permit others to access Company systems.

#### 9. LEAVE POLICY

This Leave Policy provides the necessary information about the different types of leaves that may be availed and the guidelines when applying for leave. The leave rules have been formulated to enable Employees to maintain a healthy work-life balance. This policy applies to all full-time Employees. Leaves are calculated and credited based on calendar year (Jan – Dec). Leave for Employees joining later in the year shall be calculated on a pro-rata basis.

## **Process & Guidelines**

All the leaves should be applied through the HR portal only. Leaves, if not applied through the portal within 3 days from the date of leave ending date will be treated as LOP (Loss of Pay).

The following categories of leaves are recognized by the Company.

- Planned Leave
- Sick Leave and Casual Leave
- Maternity Leave
- Paternity Leave
- Bereavement Leave
- Compensatory off
- Sabbatical Leave
- Loss of Pay
- Leave during the notice period.
- First day of period leave
- Birthday Leave

## Planned Leave (PL)

The objective of planned leave is to urge the employees to take some time off every year as that would help them to rejuvenate and get themselves recharged. All Employees are entitled to leave equivalent to 15 (fifteen) working days per annum. The leave for the year shall be credited at the beginning of the new calendar year. Leave taken more than the PL entitlement shall amount to leave without pay. All employees are expected to plan their PL and get the necessary approvals at least 2 (two) calendar weeks before the date of



commencement of PL whenever there are intervening holidays (weekends, National Holidays). During PL, only working days will be calculated as PL.

Unutilized PL up to a maximum of 6 (six) working days is allowed to be carried forward to the next calendar year. Planned leaves can be encashed in case of separation (resignation or retirement), and encashment shall be calculated at the rate of monthly basic pay. The maximum number of planned leaves that are permitted to be encashed is 21 days of leaves.

In case an Employee does not serve his/her notice period as per the offer letter/contract of employment or as agreed between the Company and the Employee, or takes leaves during the notice period, the PL balance shall stand canceled.

## Sick Leave and Casual Leave (SL &CL)

This leave applies to all Employees. All Employees are entitled to 0.5 sick and 0.5 casual leave per month. More than 2 casual leaves at a stretch cannot be applied for. PL should be availed in case of more than 2 casual Leave needed. More than 2 sick leaves at a stretch will need a supporting medical certificate. Sick Leave and Casual Leave are not permitted to be carried forward and encashment of SL and CL is not available.

Sick Leave or Casual Leave should be given with the approval of the reporting Manager.

## Maternity Leave (ML)

Women who have worked for a total of 80 working days with Quation in the preceding 12 months are entitled to Maternity Leave of up to 26 calendar weeks (182 days) on full pay. ML can be availed for 3 months pre-delivery and 3 months post-delivery, or it can be availed for 6 months post-delivery.

Additionally, special ML can be availed for 1 month (30 days) if medically advised. The same has to be supported with medical certificates.

In case the employee has exhausted her ML, SL/Cl/PL can be availed. However, leave taken more than the entitlement will be without pay.

In the case of 3rd child pregnancy, 12 weeks (84 days) of ML can be availed. In case of adoption, 12 weeks (84 days) of ML can be availed from the date of adoption.

In case of miscarriage or medical termination of pregnancy, a maximum of 6 weeks (inclusive of weekends and holidays) will be allowed starting immediately after miscarriage.

Employees are required to give 1 (one) month's notice before the date of commencement of leave.

Encashment of Maternity Leave is not permitted.



## Paternity Leave (PAL)

This Leave applies to Interns, probationers, and confirmed Employees. A total of 7 (seven) days of PAL can be availed from the date of the Spouse's post-delivery.

Encashment of PAL is not permitted.

## Bereavement Leave (BL)

This leave applies to all employees. 7 (seven) Days of Bereavement Leave can be availed in the unfortunate incident of the death of an immediate family member.

The immediate family is defined as parents, siblings, grandparents, spouses, and children.

Encashment of Bereavement Leave is not permitted.

## Compensatory Off (CO)

This leave applies to all employees. A Team member who works on a day declared as a holiday by the Company (updated and available on the Company Portal) or on a weekend (Saturday or Sunday) for 6 hours or more because of business needs, may avail a compensatory day off. CO should be credited to your leave account in the Company portal. Employees are required to apply for a grant of CO. Upon approval of CO by the Reporting Manager, the individual leave account of the employee is required to credit the leave. CO is valid for 3 months calculated from the date on which the employee works (on a declared holiday or weekdays, as the case may be), and shall lapse at the end of 3 months. Encashment for CO is not permitted.

## Sabbatical Leave (SBL)

Long-serving permanent employees with a minimum of two-year service at the company will be eligible to apply for unpaid Sabbatical Leave (SBL) to undertake, for example, research, further education, travel or to care for elderly relatives.

Sabbatical leave will be granted for a minimum of one month and a maximum of one year.

Please inform your managers and HR at least 2 (two) months before you plan to take a sabbatical.

Any eligible employee wishing to make an application for sabbatical leave should do so in writing to their line manager.

The sabbatical leaves should be applied on the HR portal after receiving the approval from Line Manager. All the Line Managers are to ensure that these leaves are applied through the portal.

Failure to apply for Sabbatical Leave through the HR portal can result in disciplinary action.



Employees are not required to return their assets while on sabbatical leave subject to manager's and HR's approval.

Employees are not permitted to encash Sabbatical Leave.

#### LEAVE DURING NOTICE PERIOD

Employees are not entitled to avail leave during the Notice Period. If an employee requires leave during the notice period to meet a personal/ medical emergency, special approval from the Manager must be sought. This leave shall be adjusted against Planned Leave (PL). In case the employee has exhausted their PL, Leave During Notice Period shall be termed as Loss of Pay (LOP) with attendant consequences.

## FIRST DAY OF PERIODS (FOP) LEAVE

The Company has introduced a menstrual policy. Experiences of menstruation can be very debilitating, yet we have been enculturated to mask their existence in the workplace, at schools, and at home. This policy supports employees in their ability to adequately self-care during their period while not being penalized by having to deplete their sick leave. Periods are not a sickness after all. This policy also seeks to remove the stigma and taboo surrounding menstruation.

This leave is designed to provide opportunities for restful working circumstances and self-care for employees experiencing symptoms of menstruation. The policy is designed to be flexible depending on the employee's needs, providing for the following options:

- The possibility of working from home:
- The opportunity to stay in the workplace under circumstances that encourage the comfort of the employee i.e., resting in a quiet area; or
- The possibility of taking a day's paid leave.

In the case of paid leave, employees are entitled to a maximum of 12 paid days per calendar year (pro-rata, non-cumulative) in the event of inability to perform work duties because of menstruation, and their associated symptoms. A medical certificate is not required.

#### **Birthday Leave**

The Company has introduced a Birthday Leave, This type of leave can be opted on the Self, spouse and child's birthday.

#### **GENERAL HOLIDAYS AND RESTRICTED HOLIDAYS**



The Company shall, at the beginning of the Calendar Year, put up a list of General Holidays and Restricted holidays on the portal with a General holiday list.

One restricted holiday can be availed out of all the options and should be applied through the portal.

#### 10. VARIABLE PAY - BONUS AND INCENTIVES PAYOUT

If the company is performing well, it would like to reward its employees using various ways and means. Hence, if the performance of the company is good, it might reward its employees with variable pay.

The Company's Variable Pay policy, in such a case, will be paid on an evaluation of the performance of the employee. The performance appraisal is normally carried out once in a Financial Year. Variable Pay is the Payment made to an employee for his/her additional contribution above their Key Responsibility Areas.

Variable pay may be communicated by the Company in advance as an incentive or presented as a reinforcement or bonus after the fact. Quation normally compensates its Employees under Variable pay in the form of cash.

The appraisal is normally done once a year, at the end of the financial year and the variable payouts are done in June.

## Variable pay and notice period.

Employees are to note the following conditions that apply to the notice period:

- If an employee resigns from the Company before the Variable payout month, they shall not be eligible for variable pay.
- Further, no employee shall be eligible for a bonus declared by the Company at the time the employee is serving the notice period.
- If the employee submits their resignation after the publishing of the Bonus Pay communication, with the payout scheduled to be made after the date of resignation, such employee shall not be eligible to receive the variable pay.

## 11. COMPENSATION AND BENEFITS TRAVEL POLICY - DOMESTIC

The objective of the Company's Travel Policy is to provide guidelines for outstation official travel by employees, ensure maximization of employee effectiveness while on official tours and ensure comfortable stays for employees during travel.



#### **APPLICABILITY**

All regular employees, including trainees on the rolls of the Company, are covered under this Policy. Travel, Lodging & Daily Allowances are part of the Travel Policy

## General guidelines to be followed:

- A domestic or international travel request shall be made strictly in accordance with the Company's travel policy and procedure.
- Travel requests must be approved before proceeding on any domestic or international travel.
- Any employee who is scheduled to travel for business purposes shall get approval in advance from the Business Heads with the recommendation of the Sales Head or Delivery Head. In the absence of the Business Head, approval shall be sought from the COO.
- The Business Head shall approve travel only as long as the cumulative expenditure on travel does not exceed the allocated budget. If the budget is exceeded, then the travel shall have to be approved by the CEO.
- Any change in travel plans to the ones already submitted shall require the Employee to submit a fresh request.
- The details on all exceptions (those covered under the head "Reimbursable Expenses" below, must be explained in the travel request in case there is an exception, and it needs to be approved by the CEO /Business Heads.
- All travel and hotel bookings for domestic and international travel are the responsibility
  of the Company and should be booked by the travel desk/administration
  department of the company.
- No personal travel plans along with business travel shall be allowed. Employees are to note that no reimbursement shall be allowed for any personal expense incurred.

#### REIMBURSABLE EXPENSES

The following expenses, incurred in accordance with the approved travel, shall be reimbursed:

- Air travel
- Train Travel
- Bus Travel
- Airport taxis
- Baggage handling (Extra Baggage will be considered only if it is related to business luggage)
- Cab/ Car rental
- Travel between hotel and office in case of outstation employee for whom.



accommodation has been provided.

- Hotel accommodation.
- Laundry services (trips over 6 working days)
- Travel meals and overtime meals.
- Public transportation (railroad, bus, business use of personal vehicle taxi/shuttle, etc.)
- Tolls and parking

#### **NON-REIMBURSABLE EXPENSES**

The following expenses incurred while on business travel, whether domestic or international, shall not be reimbursed:

- Alcoholic beverages
- Credit card late fees
- Purchase of Laptops, PCs, desktops, tablets, mobile phones, laptop bags or computer peripherals
- Registered-traveller identification programs or security clearance programs
- Airline frequent traveller program fees or club memberships
- Preferred seat assignments, early boarding, or upgrades
- Transportation between home and office on regular workdays
- Traffic violation tickets
- GPS systems, satellite radio, prepaid fuel, or fuel options in rental cars
- Additional travel or car hire insurance costs
- In-room movies
- Any personal items lost, stolen, or damaged while traveling.
- Medications and recurring prescriptions
- Transportation, duties, taxes, and other fees for shipping personal items.
- Travel expenses for pets.
- Babysitting or childcare

#### STANDARD TERMS FOR TRAVEL BY AIR:

All the travel and Hotel bookings for domestic and international travel shall be made by the company.

In exceptional situations, where an employee is compelled to book tickets, they are expected to purchase the lowest airfare applicable.

In case of air travel, Employees are expected to fly in Economy class which comes under the category of economical fare.

No employee is allowed to travel in Business class at the company's expense.



In case of cancellation of the air tickets, the employee shall forthwith inform the HR & Admin Department, who in turn shall confirm the cancellation with the travel agency, within a reasonable time, further requesting the travel agency of the cancellation of the air tickets. The ticket shall be refunded if it is possible.

The most economical means of transportation must be chosen while commuting from home to the airport and vice versa.

#### **ROAD TRANSPORTATION**

Road transportation includes the following:

**Train/Bus:** Train/Bus shall be availed by the Employee in case of time taken to destination is less than 12 hours, in accordance with the Table below:

Level	Personnel Classification	Class	
1	CXOS	AC First class	
2	Business Heads	AC First class	
3	Sales Head/ Delivery Heads	AC II tier	
4	All other employees	AC 3 tier	

**Personal car:** Subject to the approval of the Business Head, an employee may use their car for business travel. The reimbursement shall be carried out on actuals. Car travel will be entitled to Rs. 12/- per Kilometer. The company shall reimburse expenses incurred towards Toll & Parking charges for out-station travel subject to submission of receipts.

#### **Domestic Travel and Per Diem**

Level	Personal Classification	City Classification	Boarding/ Lodging per day (in Rs.) (exclusive of tax)	Mode Of Travel	Food allowance Per day (in Rs)
1	CXOS	A <sup>1</sup>	Actuals	Air, Train, Car, Bus	Actuals
2	Business Heads	В	8000 5000	Air, Train, Car, Bus	2000
3	Others	АВ	5000 3000	Air, Train, Car, Bus	1000

## 11.2 GRATUITY



The benefit of Gratuity is extended to all employees from the effective date of their employment in the Company and is regulated by the provisions of the Payment of Gratuity Act, 1972.

The amount of gratuity payable is 15 days salary for every year of completed service in the Company calculated on 26 days a month on the last basic salary drawn immediately preceding the date on which the Employee becomes entitled to gratuity under this Policy.

No Gratuity is payable if, on the date of leaving the service, the employee has not completed 1642.5 days of continuous service.

No Gratuity is payable if the services of an Employee are terminated due to disciplinary action, or any action, inquiry, or any civil or criminal proceedings are pending against the employee at the time of his termination or resignation from the Company.

If an employee dies while in the services of the company, Gratuity shall be payable to his/her legal heirs.

The gratuity amount is capped at Rs 20 lacs, as per the prevailing law. This capping amount may change if there are any changes in law.

# 12. GRIEVANCE REDRESSAL POLICY INTRODUCTION TO THE GRIEVANCE REDRESSAL POLICY

The Company's Grievance Redressal Policy in this Handbook speaks of and describes systems meant to address grievances, complaints, and concerns that employees may have in respect of their work, facilities in the workplace, and fellow employees while employed with Quation.

It covers all situations and circumstances that may lead to corrective measures that may be taken under a complaint as well as any disciplinary action that may be initiated against an employee by the Company for any act or omission that is violative of the various company policies. Employees should be aware that a robust Grievance Redressal Mechanism has been put in place to address disputes, complaints, and grievances that may, on the one hand, be seen as trivial or amount to a serious offense under extant law, on the other.

Section 13 provides the Grievance Redressal Mechanism covers situations involving employees and their workplace.

Section 14 describes the Conduct and Discipline Policy, which covers all instances and complaints of harassment of the kinds mentioned in that section (i.e., excluding

complaints of sexual harassment) and other acts and/or omissions that amount to a violation of the Company policies described in this Handbook.



Section 15 of this Handbook lays down the Company's neutral policy on the Prevention and Redressal of complaints of sexual harassment.

Thus, Sections 13 to 15 constitute the entire Grievance Redressal Policy of the Company, unless modified and published on the Company website at <a href="https://www.quation.in.">www.quation.in.</a>

Employees are advised to carefully read these policies to understand which mechanism to take recourse to any need felt to raise disputes or grievances. The scope and applicability of these policies are mentioned under each Policy head. For any queries or clarifications, you are encouraged to speak with your immediate Supervisor or HR.

QSPL's Grievance Redressal Policies are intended to not only comply with the existing laws but also to ensure that there is a conducive and respectful work environment. The Company believes in equal opportunity and employment and one way to provide for such an environment is to ensure that no discrimination of whatsoever nature is tolerated or allowed to fester.

## Scope of the Grievance Redressal Policy

A grievance refers to a complaint based on feelings of dissatisfaction or perceptions of unfair treatment about an employee's work or workplace; for example, when a company policy or code of ethics on anti-discrimination has been violated. This is different from a general complaint, which covers a wider range of topics, such as the cleanliness of the pantry area or a lack of employee support schemes. As indicated in this Handbook, some complaints may be resolved with the intervention of an Employee's immediate Supervisor or the Team Lead. A grievance may also be a formal complaint of a serious nature made to the relevant authority as per law and as provided for in this Handbook. The QSPL's overall Grievance Redressal Policy shall cover all employees of the Company including consultants and interns, so long as they work in the Company and depending on the nature of the complaint received against them.

QSPL is committed to providing a productive and conducive work environment where grievances, concerns, and complaints are dealt with fairly and promptly. The objective of this policy is to facilitate a work culture where no grievances, complaints, or workplace concerns go unaddressed and help in improving the performance and productivity of Employees of the Company.

## 13. GRIEVANCE REDRESSAL MECHANISM SCOPE OF THE GRIEVANCE REDRESSAL MECHANISM

The Supervisor, Grievance Redressal Officer, and the concerned Business head together constitute the forum before whom any grievance, complaint, or concern may be brought for resolution.



All grievances, complaints, and concerns that do not fall under Sections 14 and 15 may be brought before the officials/authority named above. The following is not an exhaustive list of complaints that may be brought before Human Resources but is only illustrative of the nature of complaints that can reasonably be expected to be raised:

- Complaints about lack of cleanliness and/or hygiene at the workplace.
- Complaints concerning a particular team/team member.
- Complaints in respect to Company Equipment.
- Complaints about alleged nuisance being created by fellow employee(s).
- Complaints in respect of facilities in the workplace.

Any other complaint of a general nature that may arise in the course of day-to-day working of the Company.

For the avoidance of doubt, the following are matters in respect of which complaints <u>shall</u> <u>not</u> be entertained under Section 13 of the Handbook. The matters listed below shall be addressed and decided in accordance with the Conduct and Discipline Policy in Section 14:

- Matters related to collective disputes/bargaining such as salary, allowances, hours of work, and other benefits and cases related to disciplinary procedures.
- Where the grievance does not relate to individual employees.
- Any matter relating to terms and conditions of appointment settled before joining or appointment/absorption.

Grievances pertaining to or arising out of disciplinary action or appeal against such action shall be channeled to the appropriate authority as laid down under the Conduct and Discipline Policy of the Company and in such cases the grievances redressal procedure shall not apply.

The COO will be the grievance redressal officer.

## Please reach out to HR for grievances

### 1. CONDUCT AND DISCIPLINE POLICY

#### 14.1 SCOPE OF THE POLICY

14.1.1 QSPL's Conduct and Discipline Policy and procedures are designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable employee behavior and performance issues. Section 6.9 of this Handbook sets out the offenses in respect of which the Company may initiate disciplinary action.

14.1.2 Outlined below is the process and procedure envisaged under QSPL's Conduct and



Discipline policy. QSPL reserves the right to combine or skip steps depending on the facts of each situation and the nature of the offense. Some of the factors that will be considered are whether the offense is repeated despite coaching, counseling or training; the employee's work record; and the impact the conduct and performance issues have on the Company.

14.1.3 Nothing in this policy provides any contractual rights regarding employee discipline or counseling, nor should anything in this policy be read or construed as modifying or altering the employment-at-will relationship between QSPL and its employees.

14.1.4 As will be clear from a holistic reading of this Handbook, the following acts or omissions, among others, on the part of the Employees may lead to disciplinary action being taken against them. That is, Employees may raise complaints under this Section in matters relating to the following. The heads or instances noted above should however not be considered to be an exhaustive list. A complaint made in respect of and connection with employment shall be taken up by the concerned committee/Employee, even if it strictly does not fall under the following categories.

- Allegations of discrimination (See Section 2.2 of this Handbook)
- Complaints of harassment (See Section 2.3 of this Handbook)
- Complaints of favoritism shown to a relative (See Section 4.3 of this handbook)
- Absence from work (See Section 5.3 of this Handbook)
- Neglect, theft, and/or destruction of company equipment and property(See Sections 6.2, 6.3, and 8 of this Handbook)
- Use of drugs or prohibited substances (See Section 6.4 and 6.5 of this handbook)
- Conflict of interest (See Section 6.8 of this Handbook)
- Complaints that the Company's equipment and time are used for personal use (See Section 6.10 of this Handbook)
- Refusal to allow inspection of company and personal property in the employee's custody

## 14.2 PROCEDURE

#### 14.2.1 <u>Initiating a Complaint</u>

14.2.1.1. A complaint under this Section shall be made in a written form providing details of the misconduct, omission, or act that violates this Employee Handbook. The details and instances of the alleged violation shall be provided coherently and clearly. Any proof in support of the complaint shall also be submitted. No anonymous complaints should be entertained. The complaint should be submitted to HR in writing.

#### 14.2.2 Step 1: Counseling and verbal warning:

A complaint or alleged violation that relates to conduct or discipline shall be dealt with by the Supervisor. The Supervisor shall discuss with the Employee the nature complaint or the



alleged violation, as the case may be, within three (3) days of receipt of the complaint or the alleged violation. Upon receipt of the Complaint or the alleged violation, the Supervisor shall adjudicate the same, clearly describing the resolution and or the steps that the concerned Employee must take to improve his or her performance or resolve the problem.

Within three (3) business days thereafter, the Supervisor shall prepare written documentation of the verbal counseling. The 3-member Committee shall consider the recommendations of the Supervisor and approve it, not later than 2 (Two) business days after receiving the report of the Supervisor. Thereafter, the Employee complained against shall be asked to sign this document to demonstrate his or her understanding of the issues and the corrective action that is expected of them.

### 14.2.2.1 Step 2: Written warning:

In step, and in case the Employee complained does not take the corrective action as is expected of him/her, a written warning shall be given along with the consequence of the continued violation of this Policy. During Step 2, the immediate Supervisor and the Head of HR shall meet with the concerned Employee once again to review the continued violation or any additional incidents or information received about their acts or omissions. At this stage, the Employee complained against shall also be formally informed, in writing, about the consequences for that Employee of his or her continued failure to meet performance or conduct expectations.

The written warning may also include a statement indicating that the employee may be subject to additional discipline, up to and including termination, if immediate and sustained corrective action is not taken.

#### 14.2.2.2 Step 3: Suspension and final written warning:

Certain complaints or continued conduct that is adjudicated as violative of the Conduct and Discipline Policy may result in the temporary removal of the employee from the workplace.

When immediate action is necessary to ensure the safety of the employee or others, the immediate Supervisor may suspend the employee pending the results of an investigation. Suspensions that are recommended as part of the normal sequence of the progressive discipline policy and procedures are subject to approval from the Business Head and Head - HR. Depending on the seriousness of the infraction, the Employee complained against may be suspended without pay.

In compliance with the extant laws, suspension of salaried employees under loss of pay shall be reserved for serious workplace safety or conduct issues. Pay may be restored to the employee if an investigation of the incident or infraction absolves the employee of wrongdoing.

#### **14.2.2.3** Step 4: Recommendation for termination of employment:



The last and most serious step in the discipline process is a recommendation to terminate employment. Generally, QSPL shall implement this policy by first providing warnings, issuing a final written warning, or suspending the employee from the workplace before proceeding to a recommendation to terminate employment. However, QSPL reserves the right to combine and skip steps depending on the circumstances of each situation and the nature of the offense. Furthermore, employees may be terminated without prior notice or disciplinary action if the nature of the misconduct or violation. The Committee's recommendation to terminate employment shall be preceded by a process of adjudication as provided above.

#### 14. ANTI SEXUAL HARASSMENT POLICY

Quation ("Organization") believes that everyone must get equal opportunity to work, regardless of race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin, or disability. It believes that a safe and conducive work environment that enables all to work without fear of prejudice, gender bias, and sexual harassment, where employer and employees respect each other's integrity and dignity, their privacy, their right to equality, and right to opportunity in the workplace, is created. It understands that equality in employment can be seriously impaired when individuals are subjected to discrimination by way of sexual harassment at the workplace. Each such incident results not only in the violation of fundamental rights of "Gender Equality" and the "Right to Life and Liberty" under Articles 14, 15, and 21 of the Constitution of India but also in the violation of Article 19 (1) (g).

The Indian Parliament has enacted the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013 along with all amendments from time to time ("**the Law**") to protect against sexual harassment of women at the workplace. The organization recognizes that the Law has been passed as a measure to provide equal opportunity to work for its women population and grant them equality under the Constitution of India. However, the Organization also recognizes that other genders aren't immune to sexual harassment and can experience such behaviors in the workplace.

The organization is committed to work and provides support towards the provision of a safe and conducive environment at the workplace for all its employees, regardless of gender. Additionally, it is committed to create an ethos of acceptance and inclusivity such that individuals regardless of their sexual orientation or sexual preferences, individuals belonging to the LGBTQIA community, and individuals choosing to not be in any of the socially constructed communities and adopt a fluid/non-binary approach feel respected and accepted at the workplace.

Considering the above, the Organization has formulated this policy against sexual harassment at the workplace ("**Policy**") as per the Law and as a healthy practice and as part of internal policies is also extending the benefit of the law to not only its women employees but also to its other employees who may belong to any gender. Thus, this Policy shall be applicable.



to all complaints of sexual harassment made by anyone against an employee of the Organization. This Policy also extends to employees working virtually or in any other location as may be necessary for the employees to perform their duties.

Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy, and do not tolerate any form of harassment or discrimination. The organization shall take strict disciplinary action as provided under this Policy against any persons found guilty of sexual harassment, regardless of gender.

#### 1. WHAT IS SEXUAL HARASSMENT?

It is an unwelcome inappropriate behavior (whether directly or by implication) that includes:

- a) Physical contact and advances including touching, deliberately brushing against another person, interference with an individual's normal work movement, or assault.
- b) Demand or requests for sexual favors, offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats, or suggestive or insulting sounds.
- c) Making sexually colored remarks containing sexual tones/undertones including repeated sexual innuendoes, sexual epithets, derogatory slurs, and sexually explicit jokes.
- d) Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures.
- e) Having posters, photographs, paintings, etc. in the background with any sexual context while being on video calls
- f) The inappropriate behaviors listed above may be committed either verbally or in written form via letters, video calls/audio calls, phone calls, texts, or e-mails on any social media platform or through any other electronic communication.
- g) Any other unwelcome visual, verbal, or physical conduct of a sexual nature.

These circumstances, among other circumstances, if it occurs or if it is present in relation to or connected with any act of sexual harassment, may amount to sexual harassment:

- a) When either implicitly or explicitly it becomes a condition of the individual's present or future employment
- b) Implied or explicit promise of preferential treatment in employment
- c) Implied or explicit threat of detrimental treatment in employment.
- d) The harassment has a purpose or effect of unreasonably interfering with the work performance or creating an environment, which is intimidating, hostile, or offensive.
- e) Humiliating treatment is likely to affect health or safety.



Sexual Harassment is not specific to any gender or from any specific gender – it could be Male to Female, Female to Male, Male to Male, or Female to Female or male or female to transgender or any other. Everyone must exercise their own good judgment to avoid engaging in conduct that may be perceived by others as Sexual Harassment. In all the above cases, it is not the intention of the person behaving but the impact on the person who is subjected to such behavior that will matter.

#### 2. WHAT IS A WORKPLACE?

**"Workplace"** shall mean all places where the Organization's work is carried out. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually. For example:

- a) All offices or other premises where the Organization's business is conducted.
- b) All Organization-related activities performed at any physical or virtual site.
- c) Any social, business, or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d) Any alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails on any social media platform or through any other electronic communication,
- e) Any sexual harassment on any social networking website during or outside of office hours
- f) Any place visited by Employee or arising out of or during employment with Organization, including transport services provided by Organization for undertaking such journey, audio/video conferencing applications, or any other communication-related tools/applications. For example, Employees who are on overseas programs and training in course of their employment with the Organization.

#### 3. WHO IS AN EMPLOYEE?

**Employee**" means a person employed at a workplace for any work on a regular, temporary, ad hoc, or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working voluntarily or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

# 4. WHO IS A VISITOR / THIRD PARTY?

**"Visitor"** or **"Third Party"** includes any person who is visiting the Workplace and is not covered by any of the other categories defined by this Policy. For example, guests coming for physical/online interviews, meetings, events, programs, or people walking in to meet existing Employees, etc.

#### 5. HOW ARE CONCERNS RELATED TO SEXUAL HARASSMENT REDRESSED?



The organization has constituted an Internal Committee ("IC") for receiving and redressing complaints related to Sexual Harassment at Workplace.

#### a) Constitution of the IC:

At all times, the IC shall comprise of the following:

- i) A senior-level woman Employee shall be appointed as Presiding Officer of the IC ("Presiding Officer"). The Presiding Officer shall automatically vacate her office upon ceasing to be an Employee of the Organization.
- ii) A minimum three (3) members of the IC will be appointed from amongst Employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field. These members shall automatically vacate office upon ceasing to be Employee of the Organization.
- iii) Minimum one (1) member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment (will be appointed soon). This member shall vacate the office upon termination of contract with the Organization.
- iv) At least one-half of the total members nominated to the IC shall be women.

All IC members are duty-bound to oversee all complaints without any bias or partiality towards any party. The term for the IC is a maximum of 3 years.

#### b) Removal of IC members:

An IC member shall be removed/replaced if the IC member:

- i) breaches confidentiality
- ii) has been convicted for an offense or an inquiry into an offense under any law for the time being in force is pending against them.
- iii) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against them.
- iv) has abused their position to render their continuance in office prejudicial to the public interest.
- v) Any vacancy created in the IC due to cessation of employment, resignation, death, disability, or removal, as applicable, shall be filled by a fresh nomination by the Organization in accordance with its guidelines and in conjunction with the provision of Law (where applicable).

Details of IC are given in Annexure 1.

# 6. WHO CAN FILE A COMPLAINT?

Anyone, of any age or gender whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent ("Aggrieved Person") and the term "Respondent" shall refer to the person (i.e., the Employee of the Organization as defined above) against whom the complaint of sexual harassment has been filed.



#### 7. WHAT IF THE AGGRIEVED PERSON IS UNABLE TO MAKE A COMPLAINT?

If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person by:

- a) their relative or friend: or
- b) their co-worker; or
- c) Officer of the National Commission for Women or State Women's Commission or
- d) any person who has knowledge of the incident

If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

- a) their relative or friend; or
- b) a special educator; or
- c) a qualified psychiatrist or psychologist; or
- d) the guardian or authority under whose care they are receiving treatment or care; or
- e) any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

If the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent. If the Aggrieved Person is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Any of the persons referred to above, who may file a complaint on behalf of the Aggrieved Person shall be referred to as the "**Complainant**." Any reference to the term 'Complainant' throughout this Policy shall mean a reference to 'Aggrieved Person' and/or the 'Complainant' as applicable.

# 8. HOW TO FILE A COMPLAINT?

The Complainant can make a complaint of Sexual Harassment to the IC. The following need to be kept in mind:

- a) The complaint must be in writing.
- b) The Complainant should provide (if possible) as many specific details as possible including incidents, dates, and people that engage in their complaint. Details with respect to the following may be provided while filing a complaint:
  - i) The alleged event, matter, or issue that is subject to the complaint (time/date/place, etc.)
  - ii) The name and details of the Respondent against whom the complaint is being filed.
  - iii) Names and addresses of the witnesses (if any)
  - iv) Details of documentary evidence (if any) such as WhatsApp chat records, SMS, E-mails, CCTV Footage, Audio / Video recording etc. and



- v) Any additional information, documentation, or other evidence available to support the complaint (if any)
- c) Complaints must be made within a period of **3 (three) months** from the date of the incident and in case of a series of incidents, within a period of **3 (three) months** from the date of the last incident.
- d) The IC, at its discretion, can extend the time limit for receiving a complaint to another period of **3 (three) months** if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the **first 3 (three) months**.
- e) IC will record the reasons for such an extension of **3 (three) months** in writing.

If the Complainant needs assistance in writing the complaint, they can seek help from IC. The complaint can be submitted electronically at <a href="Posh@quation.in">Posh@quation.in</a> to the IC or with any of the IC members (details provided in **ANNEXURE 1**). Complaints can also be physically submitted to the Quation office with any of the IC members (Details provided in **Annexure 1**).

# 9. WHAT IF A COMPLAINT IS AGAINST SOMEONE WHO IS NOT AN EMPLOYEE OF THE ORGANIZATION?

If any Employee/Third Party is sexually harassed by any external party who is not an Employee of the Organization, either on Organization premises or on that external party's premises, then IC shall contact either the internal committee of that external party and/or the Police (as the case may be), on the written complaint of such Employee/Third Party to the Organization's IC and on their request that such complaint be transferred to other IC and address the matter to satisfactory closure. Alternatively, the Employee/Third Party may choose to reach out directly to the IC of that external party and/or Police (as the case may be) and the Organization will help on written request by the Employee/Third Party.

Complaints about sexual harassment at work must be reported to the hierarchy listed below.





\*LC (local committee created at the district level by the District Officer to investigate a complaint of sexual harassment against the Employer).

### 10. WHAT IS THE PROCESS FOR HANDLING COMPLAINTS BY IC?

#### a) Process for Conciliation:

Prior to initiating an inquiry, the IC may, at the written request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. The following need to be kept in mind with respect to conciliation:

- i) It is not mandatory for a Complainant to request for Conciliation.
- ii) Conciliation cannot be done if the inquiry has already started.
- iii) In case a settlement has been arrived at, the IC shall record it and forward it to the Organization to take action as specified in the recommendation of the IC.
- iv) The IC will also provide copies of the settlement as recorded to the Complainant and the Respondent.
- v) If conciliation has been reached, the IC will not be required to conduct any further inquiry.
- vi) Monetary settlement cannot be made based on such conciliation.
- vii) If the Complainant feels that the terms of Settlement are not being complied with by the Respondent or action has not been taken by the Organization, the Complainant can make a written complaint to the IC to conduct an inquiry into the complaint.

## b) Procedure for Inquiry:

If the Complainant does not wish to go for conciliation or if the conciliation reached between the parties is not complied with, the IC shall, upon a written request from the Complainant to do so, proceed to make an inquiry into the complaint in the manner as provided under the Service Rules and Law, as may apply to the Respondent and if



no service rules are applicable, then as per the process prescribed under this Policy and the Law. The following need to be kept in mind with respect to inquiry:

- On receipt of the complaint, the IC shall send a copy of the complaint received from the Complainant to the Respondent within a period of **7 (seven) working days**. If the complaint has been received by email, the IC member shall forward the same to the Respondent, with clear instructions that the same is not to be shared with anyone and strict confidentiality has to be maintained.
- ii) The Respondent shall file the reply to the complaint along with a list of documents and names and addresses of witnesses (if any), within **10 (Ten) working days** from the date of receipt of the documents.
- iii) If the Complainant or the Respondent desires any witness/es to be called, they shall communicate in writing to IC the names of witnesses/es whom they propose to call.
- iv) If the Complainant desires to tender any documents by way of evidence before the IC, they shall supply copies of such documents. Similarly, if the Respondent desires to tender any documents in evidence before IC they shall supply copies of such documents. Both shall affix their signature on the respective documents to certify these to be authentic documents.
- v) The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents, and/or any other matter which may be necessary for the inquiry process. Any refusal by any Employee of Organization to attend any hearing before the IC when summoned or to provide to the IC, any documents and/or information within their power or possession shall constitute misconduct, rendering such Employee for adverse action by Organization.
- vi) The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for 3 (three) consecutive hearings convened by the Presiding Officer. Such termination or ex-parte order may not be passed without giving notice in writing, 15 (fifteen) days in advance, to the Complainant or Respondent as the case may be.
- vii) In conducting the inquiry, at any point in time, the Complaint shall be heard by a minimum of 3 (three) members including the Presiding Officer IC shall complete the inquiry within a reasonable period but not beyond 90 (ninety) days.
- viii) IC shall notify in writing, the time and dates of its meetings to the Complainant, the Respondent, and witnesses.
- ix) All inquiry proceedings will be documented in detail and treated as strictly confidential with restricted viewing only on a need-to-know basis.
- x) Inquiry proceedings shall be minute / recorded in writing. They may be audio recorded as well (where possible). The minutes / transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and IC in token of authenticity thereof.
- xi) All colleagues and witnesses who are part of the IC proceedings will need to sign a confidentiality declaration.
- **xii)** The Complainant and Respondent shall not be allowed to bring in any legal practitioner to stand in for them in their case at any stage of the proceedings before the IC.



#### c) The things IC shall keep in mind while inquiring into a complaint:

- i) The IC shall make an inquiry into the complaint following the principles of natural justice such that IC shall provide every reasonable and fair opportunity to the Complainant as well as to the Respondent, for putting forward and defending their respective side.
- ii) The IC shall be sensitive to the often covert, private and insidious nature of sexual harassment and shall consider that often the Complainant may not be able to submit or present direct or corroborative evidence.
- iii) The IC shall take note of the respective socio-economic positions of the parties, their hierarchy in the Workplace, and other power differentials while giving recommendations.
- iv) While inquiring into a complaint, IC shall take note that in cases of harassment via postings and messages through electronic and social media, the IC shall consider the public humiliation that this involves for the Complainant as well as the unwitting exposure of others who are using this media to circulate such messages and images.

# 11. CAN ANY ACTION BE TAKEN DURING PENDENCY OF THE INQUIRY?

During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend any of the following to the Organization:

# a) In case the Complainant and/or Respondent are Employees, any one or more of the following may be recommended:

- i) Grant leave to the Complainant for up to a period of 3 (three) months (the leave granted shall be in addition to the leave the Complainant is otherwise entitled to)
- ii) Transfer the Complainant or Respondent to any other workplace.
- Restrain the Respondent from reporting on the work performance of the Complainant or drafting their confidential report and assign the same to another Employee (if applicable)
- iv) In case the complaint has been filed by an intern or an apprentice working under the Respondent, restrain the Respondent from supervising any official / academic activity of the Complainant and assign the same to another Employee.
- v) Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, video/audio calls, on any social media platform, or via any other mode of electronic communication.
- vi) In case the complaint is filed by a Complainant, the same benefits as above would apply, depending on facts and circumstances.

The Organization reserves the right to require any of the parties to take any leaves during the pendency of inquiry at any time after receipt of a complaint of sexual harassment until the IC has concluded its inquiry, if needed, based on the recommendation of the IC. Any such decision will be communicated in writing to the party by the Organization. This is to ensure that there is no retaliation against any party. The Organization reserves the right to require parties to work from home or from an alternate Organization location during the pendency of inquiry.



# b) <u>In case Respondent is a Visitor / Third Party, any one or more of the following may be</u> recommended:

If the Respondent is a Visitor / Third Party adequate steps to ensure that they do not enter the Organization premises or contact/threaten the Complainant/Witnesses directly or indirectly using any mode of communication. IC to suggest disciplinary action by the concerned authority including reaching out to the Police if needed with the consent of the Complainant.

# 12. WHAT IS AN INQUIRY REPORT AND WHAT ACTIONS CAN BE SUGGESTED UNDER IT?

On completion of the inquiry, the IC shall supply a written report of its findings and recommendations to the Organization within **10 (ten) days** from the date of completion of the inquiry. Such a report shall also be made available to Complainant and Respondent. The inquiry report shall specify details of the allegations against the Respondent, the statements made, and evidence presented by the Complainant, Respondent and/or witnesses, IC's findings along with a statement giving reasons for the findings arrived at by the IC and IC's recommendations.

## a) In case allegations against Respondent have not been proven:

If the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Organization that no action must be taken in the matter.

## b) In case allegations against Respondent have been proven:

Where the IC decides that sexual harassment has taken place, to whatever extent, immediate corrective and preventive measures will be recommended. The severity of the recommendation will be determined by the first time/ misunderstanding/ habitual offender etc.

# i. Where the Respondent is an Employee, IC may recommend any one or more of the following:

Where the Committee arrives at the conclusion that the allegation against the Respondent has been proved, where the Respondent is an Employee, it will recommend to the Company:

- 1. To act for sexual harassment as misconduct as per Organization Policy.
- 2. To act as per the service rules applicable to the Respondent and where no service rules are applicable to take any action including:
  - A written apology from the Respondent
  - A letter of warning may be given to the Respondent that will be placed in the personnel file.
  - Reprimand or censure the Respondent.
  - Withholding the promotion or reduction in rank
  - Withholding of pay rise or increments.
  - Immediate transfer or suspension without pay.
  - Termination from service/dismissal from the services of the Organization
  - Undergoing a counseling session



- Carrying out community service
- deduction from the salary or wages of the Respondent such sum as it may consider right to be paid to the Complainant or to their legal heirs. In case, Organization is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent does not pay the sum, the IC may send the order for recovery of the sum as arrears of land revenue to the concerned district officer.

IC may consider various factors as required under Law for the purpose of determining the sums to be paid to the Complainant and may take the following into consideration:

- the mental trauma, pain, suffering and emotional distress caused to the Complainant.
- the loss in the career opportunity due to the incident of sexual harassment
- medical expenses incurred by the victim for physical or psychiatric treatment.
- the income and financial status of the Respondent
- feasibility of such payment in lump sum or in instalments

# ii. Where the Respondent is a Third Party, IC may recommend any one or more of the following:

- Warning to employing Organization/association/firm (if any)
- Declaring the Workplace/Organization out of bounds to the Respondent
- Withdrawal of the right to supply services to Organization for a certain period (if applicable)
- Helping the Complainant in filing an FIR, should they want.
- Debarring/block-listing such person from Organization.
- Other similar or punishment

Organization shall act upon the recommendation given by IC within **60 (sixty) days** of receipt of the recommendation.

# c) In case it is proven that the Complaint is malicious:

- i) If on inquiry, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the Respondent / tarnishing their image in Organization or otherwise and/or to settle personal / professional scores, strict action will be recommended by IC against the Complainant. Hence, in case IC arrives at a conclusion that allegation against the Respondent is malicious or Complainant has made the complaint knowing it to be false or has produced a forged or misleading document, IC may recommend to Organization to take an action applicable to Respondent if the complaint in section 12(b) (i) was genuine. In this regard, IC may recommend any of the actions where specified above (As applicable).
- ii) A mere inability to substantiate a complaint or supply adequate proof need not attract action against the Complainant as the malicious intent on the part of the



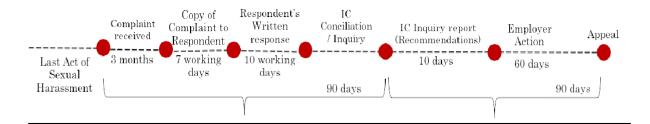
Complainant will have to be established through the inquiry process before an action against such Complainant is recommended.

#### 13. PROCEDURE FOR FILING AN APPEAL

In case the inquiry process is conducted by the IC and the Complainant is a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and/or non-implementation of recommendations may file an appeal to the Appellate Authority as per service rules and/or as per other provisions of Law within 90 (ninety) days of the recommendations.

In case the inquiry process is conducted by the IC and the Complainant is not a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and/or non-implementation of recommendations can get in touch with [Appellate Authority], who will review the appeal.

#### **TIMELINES**



## 14. CONFIDENTIALITY

All discussions / decisions about an incident of sexual harassment must be kept confidential. Therefore, contents of the complaint made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of the IC and action taken on the Respondent shall not be published, communicated or made known to the public, press and media in any manner. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Appropriate information will be shared with Government authorities as per the Act. If any person breaches confidentiality, they shall be liable for penalty as per service rules and / or Law. The organization shall recover a sum of rupees five thousand (5,000) as penalty from such person and may take any other action as it may deem fit.



## 15. PROTECTION AGAINST RETALIATION

There will be no retaliation against anyone who, in good faith, files a complaint or takes part in any way in the inquiry of a complaint. The organization will not allow retaliation against that person. Individuals engaging in retaliatory conduct will be subject to strict disciplinary action and if necessary legal action and/or a police complaint. If you suspect that you or someone you know has retaliated against for raising an issue, at once contact the IC.

#### 16. FILING OF COMPLAINT WITH POLICE

Nothing in these rules and procedures shall prevent anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offense under the law. The organization will help in this regard if assistance is sought. This Policy is not intended to impair or limit the right of any Employee seeking a remedy available under any law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a Complainant (as defined hereinafter) against Respondent under any law in force.

In case of a complaint of sexual harassment or any other offense against a child, as per the Protection of Children from Sexual Offences Act, 2012 ("POCSO"), or in case of offense by a child, the provisions under POCSO and Juvenile Justice (Care and Protection of Children) Act, 2015 may become applicable and would have to be dealt with in accordance with these laws. A child is any person below the age of eighteen years.

#### 17. AVAILABILITY OF MENTAL HEALTH PROFESSIONALS

The Organization shall help, such as availing the services of a mental health professional, to any of the concerned parties on request as may be required from time to time.

## 18. RESPONSIBILITIES OF EMPLOYEES

- a) Everyone has a personal responsibility to ensure that their behavior is not contrary to this Policu.
- b) Set an example of dignified workplace behavior and ethical standards in line with Organization's values and code of conduct.
- c) To be mindful of professional and personal boundaries while performing your duties for the organization and being the organization.
- d) Create and sustain a healthy work environment.
- e) Do not ignore or allow inappropriate behavior to continue regardless of who is creating that situation.
- f) Support and cooperate during any inquiry of a complaint, including testifying as witness and giving full and truthful disclosure of all information when asked by the IC, while ensuring that complete confidentiality is maintained throughout, about any complaint of sexual harassment within Organization.



- g) Be aware that Organization will take allegations seriously and will ask their cooperation in an inquiry if they bring a complaint forward.
- h) Handle information related to known or suspected violations of this Policy in a discreet and confidential manner and not try to investigate / inquire into the information or suspected violations of this Policy on your own i.e., without involving the IC.
- i) Report any inappropriate behavior to IC at once.
- j) Do not misuse the policy or the law by filing malicious complaints for settling personal scores, seeking revenge or for personal gains and benefits etc.
- k) To remember that on social media, the employees represent the Organization and therefore to ensure that they post information/comment/opinion that is responsible, professional and protect the interests of the Organization.
- 1) With respect to virtual working:
  - (i) Ensure that video/audio calls are scheduled during working hours as much as possible.
  - (i) State the preferred modality (video or audio) while scheduling the meeting/blocking other person's calendar & allow for flexibility for the individual to confirm
  - (ii) Seek consent before requesting a video call for a one-on-one conversation.
  - (iii) Do not insist on video calls where not necessary, and/or if your colleague/s expresses difficulty in joining via video call.
  - (iv) While on video/audio calls, be mindful of the professional boundaries, and do not initiate conversations/jokes that could make others uncomfortable.
  - (v) While on video calls, ensure that a professional dress code is followed, and the background does not have anything inappropriate.
  - (vi) Do not share/forward inappropriate or offensive posts or images on team chat or social media, etc.
  - (vii) Do not forward any personal message, image, or video sent to you without the sender's consent.
  - (viii) Do not repeatedly send messages to engage in personal discussions, comments, likes on posts, pictures etc. in the absence of any positive, enthusiastic response.
  - (ix) Do not repetitively ask any employee to accept your friend/follow request on any social media platform.
  - (x) Do not engage in online bullying, stalking, or harassment.

#### 19. RESPONSIBILITIES OF THE IC

- a) Receive and address complaints of sexual harassment and inquire into complaints in detail.
- b) Assist the Complainant in filing the complaint in case the Complainant is unable to do so.
- c) Inquiry shall be a priority for an IC member.
- d) Ensure a quorum of a minimum of three (3) members is met during all Inquiry meetings, with the mandatory presence of the Presiding officer at all inquiry meetings.



- e) Seeking consent from involved parties and witnesses for audio/video recording of the inquiry proceedings.
- f) Follow the principles of natural justice and treat the Complainant, Respondent, witnesses and related persons to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions. All members of the IC shall be acting without any prejudice or bias while conducting inquiries or dealing with complaints of sexual harassment in any other manner.
- g) Make efforts to ensure that the Complainants and the witnesses are not further victimized or discriminated against while the complaint is pending.
- h) Recuse themselves from their assigned job for the purpose of conducting an Inquiry if there is conflict of interest or a bias coming in the way of conducting a fair Inquiry.
- i) Act appropriately to ensure confidentiality of the inquiry process while conducting inquiry physically or virtually.
- j) Document in detail all the inquiry proceedings and the inquiry report.
- k) Refrain from talking about a potential, pending or completed case of sexual harassment to any member directly or indirectly connected to any form of media, including print, Television, online media etc.
- l) Review the status of all complaints received. Recommend action against anyone who threatens or intimidates the Complainant or members of the IC.
- m) Read and acquaint themselves with the Policy and attend training on this subject matter.
- n) Compile annual reports and send them to the concerned authorities.
- o) In the event, the complaint does not fall under the purview of sexual harassment, or the complaint does not mean an offence of sexual harassment, forward the same to the concerned person / committee.

## **20.ORGANIZATION'S RESPONSIBILITIES**

- a) Organization will not tolerate any act of sexual harassment. It shall treat sexual harassment as 'Misconduct' and take prompt, proper action for the same.
- b) It will organize gender-sensitization workshops and awareness programs once in 3 months covering all locations.
- c) Shall raise awareness about the prevention of sexual harassment through posters, calendars, mugs and other mediums.
- d) To sensitize managers to conduct calls/meetings during working hours as much as possible, and to not insist on any employee/team member attending video calls, where not necessary and/or if they express difficulty in joining via video call.
- e) It will ensure that necessary facilities and information are provided to the IC including technical support for dealing with the complaint and conducting an inquiry.
- f) Assist in securing the attendance of Respondent and witnesses before the IC and make available such information to the IC as it may require with regards to the complaint.
- g) Help the IC in any manner feasible to conduct a fair and expeditious inquiry and implement recommendations made by IC.



- h) Help the Complainant if the Complainant chooses to file a complaint in relation to the offence under the Indian Penal Code. Cause to initiate action, under the Indian Penal Code, against Respondent or if the Complainant so desires, where the Respondent is not an Employee, in the workplace at which the incident of sexual harassment took place.
- i) Cause to initiate action, under the Indian Penal Code, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.
- j) Offer counselling sessions to anyone affected by incident of sexual harassment.
- k) Do all other things it may consider fit for successful implementation of this Policy.

#### 21. AMENDMENTS

Organization reserves the right to amend the Policy from time to time to follow any laws / rules / regulations that come into effect from time to time, related to sexual harassment at workplace. This Policy shall be reviewed bi-annually or as and when key issues get raised to incorporate amendments.

This Policy does not intend to create any contractual obligation for or with the Organization, and in case of dispute with the Law and the Policy, the Law shall prevail.

# Annexure 1 Members of the Internal Committee

Sl.no	Title	Name	Contact details	Contact no
1	Presiding Officer	Triveni Hiremath	triveni.hiremath@quation.in	8884408212
2	Member	Deepak Raj	deepak.raj@quation.in	9900001627
3	Member	Roopa S	roopa.s@quation.in	9880004693
4	Member	Deepthi Vuppala	deepthi.vuppala@quation.in	9686692065
5	Member	Subramaniam Mani	subramaniam.mani@quation.in	9739387799

If you are unable to make a complaint in writing for any reason, you may contact any of the members of the IC (details of whom are provided above) and they shall render assistance to you in making the complaint in writing.

You may file a complaint in person during office hours at the Human Resource Department or send the same to IC electronically at <a href="mailto:posh@quation.in">posh@quation.in</a>.