



# ORGANIZATIONAL POLICIES OF HR VIDYALAYA CORPORATE SERVICES LLP

## **Policy 1: Equal Employment Opportunity Policy**

HR Vidyalaya Corporate Services LLP, is sincerely committed to equal opportunity employment. Job aspirants and Employees of this company will be evaluated without discrimination to,

- (1) Age
- (2) Gender
- (3) Colour
- (4) Caste
- (5) Creed
- (6) Localisation
- (7) Nationality
- (8) Physical or Mental challenges, etc

All employees of our Company (during their entire life cycle in this company) will be facilitated, protected with provisions of applicable Central or State Government legislations, eg. Equal Remuneration Chapter of Code on Wages, 2019, Transgender Persons (Protection of Rights), Act and Rules, Rights of Persons with Disabilities Act, 2016, etc). Adherence to the current and provisions amended from time to time will be COMPLIED.

## **Policy 2: Prohibition of Discrimination, Harassment and Victimization Policy**

HR Vidyalaya Corporate Services LLP, is committed to maintaining a workplace free from any forms of unlawful discrimination, victimization and harassment.

Any discrimination or victimization or harassment based on:

- (1) Age
- (2) Gender
- (3) Colour
- (4) Caste
- (5) Creed
- (6) Localisation
- (7) Nationality
- (8) Physical or Mental challenges, etc

Will be treated as **MISCONDUCT** and appropriate action will be initiated. As a Policy HR Vidyalaya Corporate Services LLP is determined to react and respond appropriately to any such complaints or report of discrimination, victimization or harassment.

**"Discrimination"** includes any and all conduct, that:

- A Person is treated less favourably, due to some reason
- A Person is suffering with a Disadvantage compared to others

**"Harassment"** includes any and all conduct, that:

- Creates a hostile or intimidating or humiliating work environment
- Substantially interferes with the ability of others to perform their work
- Denies employment opportunity to others

**"Victimization"** includes any and all conduct, that:

- A person who was treated less favourably as he/she has taken up a complaint or intending to complain about a discrimination or harassment in the workplace

This policy applies to all employees including temporary, independent contractors, vendors, consultants, visitors, non-employee work contacts and customers.

## **Policy 3: Anti-Sexual Harassment Policy, adhering to the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013**

This policy aims to:

- ❖ **Prohibit, prevent or deter the commission of acts of sexual harassment at workplace**
- ❖ **To provide the procedure for the redressal of the complaints pertaining to sexual harassment.**
- ❖ **To have a friendly work environment.**

HR Vidyalaya Corporate Services LLP, is committed to provide a safe and conducive work environment to its employees and expects them to combine “Expertise with responsibility”. Towards this it is essential that each employee deals with their colleagues and third parties with full fairness and respect and realizes that his/her behavior will be attributed to the company and can affect its inward and outward reputation.

Every “**Woman at the workplace**” has the right to be protected against sexual harassment, regardless of whether the accused considers his or her own behavior to be normal or acceptable and of whether the harassed person has the opportunity to avoid the harassment. HR Vidyalaya Corporate Services LLP is committed to providing a work environment free of sexual harassment. Sexual harassment is a form of workplace harassment of a sexual nature that affects the dignity of men and women at work. Where sexual harassment occurs to a HR Vidyalaya Corporate Services LLP employee as a result of an act by a third party or outsider while on official duty, we HR Vidyalaya Corporate Services LLP, will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

### **What is Sexual Harassment?**

- ❖ Sexual Harassment includes such unwelcome sexually determined behavior, as physical contacts and advances, sexually coloured remarks, showing pornography and sexual demands whether by words, gestures or actions. Such conduct can be humiliating and may constitute a health and safety problem.

- ❖ Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories - *quid pro quo* and *creation of a hostile working environment*
  - Under the **quid pro quo** (this for that) form harassment, a person or authority, usually the superior of the victim, demands sexual favour for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.
  - A **hostile work environment** arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on personal dignity. For example, an employee tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers.
- ❖ **In case if the Aggrieved Woman feels Sexual Harassment, she can immediately (or) later complain to, either of the following:**
  - **Internal Committee of the Establishment (Currently not obligated to constitute such committee in HR Vidyalaya Corporate Services LLP)**
  - **Local Committee of the Area**
  - **Local Police Station**
  - **Women & Child Development Department, or**
  - **Email the complaint to <http://www.shebox.nic.in/>**
- ❖ **Role of the Employee who is being harassed**
  - Tell the accused that his / her behavior is unwelcome and ask him/her to stop
  - Keep a record of incidents (dates, times, locations, possible witness, what happened, etc.). It is not mandatory to have a record of events to file a complaint, but a record can strengthen the case and help remember the details over time, in case the complaint is not filed immediately
  - File a complaint as soon as possible. If, the harassment continues, even after asking the accused to stop his / her behavior report the abuse

❖ **Disciplinary Action:**

Where the allegations against the accused is established, the Management shall take appropriate action

❖ **Confidentiality:**

All information received during the entire process starting with filing of the complaint shall be kept confidential. Any person (including complainant, witnesses, accused or the HR members) who breaches confidentiality shall be subject to disciplinary action.

❖ **Protection Against Retaliation:**

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the HR shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the HR immediately. Disciplinary action will be taken against any such complaints which are found genuine.

❖ **Complaints made with a malicious intent:**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, all employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

## **Policy 4: Anti-Corruption Policy**

The nature of our business often requires that we, HR Vidyalaya Corporate Services LLP, interact with officials of various governments. Company policy and applicable laws establish certain limits on those interactions.

**The Company is committed to doing business with integrity.**

As an Organizational Policy, HR Vidyalaya Corporate Services LLP shall NOT directly meet any Government authorities, on their own or on behalf of its Clients. The interaction shall be limited to collection or submission of documents/records only. No employees of HR Vidyalaya Corporate Services LLP shall interact with the Government authorities or any other officials connected therein for any purpose connected with the services of its Clients.

HR Vidyalaya Corporate Services LLP shall only facilitate the Client or Client Representative in supporting the documents / records / registers for the purpose of meeting or interacting with the Government Authorities. Employees of HR Vidyalaya Corporate Services LLP may in such circumstances, accompany the Client or Client Representative to Government Offices but completely refrain from interacting with the Government Authorities.

The Anti-Corruption policy of HR Vidyalaya Corporate Services LLP is to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act ("UKBA"), and the local laws in every country in which we do business. These laws prohibit bribery of foreign government officials (broadly defined later in this policy), and with regard to the FCPA in particular, mandate that companies establish and maintain accurate books and records and sufficient internal controls. The UKBA also prohibits private sector (commercial) bribery.

A violation of anti-corruption laws can lead to severe civil and criminal penalties and is cause for disciplinary action (up to and including termination of employment); therefore, it is vital that all persons connected with HR Vidyalaya Corporate Services LLP not only understand and appreciate the importance of these policies and procedures, but comply with them in your daily work.

This policy applies to all employees of the HR Vidyalaya Corporate Services LLP, including Designated Partners. In addition, the Company will require third parties who represent the Company (such as agents, consultants, and contractors) to conduct themselves in a manner consistent with this policy.

**All employees and third parties should remain vigilant in watching for, avoiding, and reporting to the Management Representatives of HR Vidyalaya Corporate Services LLP, any questionable transactions that may violate this policy.**

Although this policy focuses primarily on compliance with the FCPA and UKBA, it is necessary to remain equally attentive to compliance with all applicable corruption laws, including the Central, State and local laws of India.

The FCPA, UKBA, and local corruption laws will be referred to collectively as “Applicable Corruption Laws” in this policy.

For the purposes of this policy, the term “government official” is broadly defined to include:

- Any officer or employee of any government entity, department or agency
- Any employee of a state or government-owned business, school, hospital or other entity
- Any political party or official thereof
- Any candidate for political office
- A public international organization or any department or agency
- Any person acting in an official capacity on behalf of a government entity

### **Prohibition on Bribery**

Applicable Corruption Laws prohibit companies and their employees and representatives from (directly or indirectly) giving, promising, offering or authorizing payment of anything of value to any government official in order to obtain or keep business or to secure some other improper advantage. In essence, these laws prohibit the giving of anything of value to influence a government official’s actions.

The prohibition on bribery applies to the giving of anything of value, not only money.

This includes but is not limited to providing business opportunities, favorable contracts, stock options, gifts and entertainment.

The UKBA also specifically prohibits the offering or acceptance of corrupt payments and other advantages between private (non-government) persons and entities. Such conduct constitutes commercial bribery and is also prohibited by our Company.

### **Facilitating Payments**

Facilitating (or expediting) payments also are prohibited under this policy. Facilitating payments are small payments paid to government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers such as visas, providing police protection, providing telephone, power or water service or loading or unloading of cargo.

Although there is a narrow exception for facilitating payments under the FCPA, such payments are prohibited under the UKBA and the laws of many other countries.

Therefore, in order to ensure compliance with all Applicable Corruption Laws, HR Vidyalyaya Corporate Services LLP prohibits facilitating payments altogether.

### **Permitted Payments**

Although this policy is intended to provide guidance, anti-corruption matters are not always clear and must often be addressed on a case-by-case basis. In all situations where there is a question, employees should consult the Designated Partners prior to taking action.

### **Services**

The Company may pay for legitimate services provided by a government entity or government official, such as paying a Statutory Fee.

### **Gifts, Meals, and Entertainment**

Under certain circumstances, it may be permissible to provide modest gifts or a meal or other entertainment to a government official as a social amenity. When deciding whether

a gift is appropriate, employees also must take into account any past, pending or future business or administrative matters that are within the recipient's realm of influence. The timing and context surrounding such gift or entertainment must be weighed in order to assess whether any particular gift or entertainment could be perceived to be a bribe.

Generally, gifts, meals and entertainment are permissible, provided that:

- Hospitality offered on behalf of the Company must be directly related to Company business, i.e., the marketing or sale of its services.
- Hospitality in all cases must be reasonable in amount, must be offered in good faith only in connection with the promotion, demonstration or explanation of Company services or the execution or performance of a contract with a government or agency thereof, and must be lawful under applicable local law.
- There is no expectation that the gift, meal or entertainment is given in exchange for any return favor or business advantage from the government official (quid pro quo);
- The gift, meal or entertainment is infrequent, reasonable, and proportionate in amount under the circumstances; and
- The gift, meal or entertainment is lawful under Applicable Corruption Laws.
- Unless otherwise approved by the General Counsel in writing, expenses for hospitality meals should not exceed the following U.S. dollar amount per person:
  - Breakfast: \$50.00   Lunch: \$200.00   Dinner: \$200.00
- Refreshments unaccompanied by a meal should not exceed \$50.00 per person.
- Cash gifts to government officials are not permitted under any circumstances. Per diem payments to government officials are also prohibited.
- Promotional items of nominal value such as coffee mugs, calendars, or similar items, or items displaying the Company logo that are distributed for advertising or commemorative purposes, or gifts of nominal value on customary holidays are permitted. "Nominal value" is \$100.00 or less.
- In all cases that entertainment, gifts or travel expenses are approved, the expenses must be supported by receipts and accurately recorded in the Company's books.

### **Personal Safety Payments**

Personal safety payments are permissible under this policy. A personal safety payment is a payment to avoid imminent physical harm. Personal safety payments do not include payments made in response to commercial duress, or in response to threats to commercial, financial or other interests. If confronted with a situation in which you believe that there is an imminent threat to your health or safety, you must use your best judgment in determining whether to make a personal safety payment.

### **Donations / Political Donations**

HR Vidyalyaya Corporate Services LLP prohibits Donations to any persons or organizations or groups of individuals or Political Parties, for any purpose.

### **Third Parties**

Applicable Corruption Laws prohibit corrupt payments made directly by Company employees or indirectly through a third party such as a consultant acting for or on behalf of the Company.

Under the FCPA, it is unlawful to make a payment of anything of value to any person, knowing that all or any portion of the payment will be offered, given or promised to a government official or any other person for a corrupt purpose. The term "knowing" includes conscious disregard, deliberate ignorance, and willful blindness. In other words, the Company and individual employees may violate the FCPA if we have "reason to know" or "should have known" that a third party will bribe a government official.

Accordingly, the most important step the Company can take to protect itself from liability for improper payments made by third parties is to choose its business partners carefully.

The Company will conduct appropriate due diligence and will exercise care in selecting such third parties by employing only reputable entities and will pay only reasonable compensation for the services provided.

The Company will require third parties who represent the Company to conduct themselves in a manner consistent with this policy. Such third parties will periodically be required to provide the Company with a certification of compliance with all applicable laws, including any Applicable Corruption Laws.

In addition, agreements with certain third parties must contain representations and warranties regarding the third party's agreement to comply with Applicable Corruption Laws.

### **Due Diligence; Mergers or Acquisitions**

The Company will not enter into any relationship with a third party who will have substantive interaction with government officials on behalf of the Company without an inquiry into the third party's background, qualifications and reputation. Any issues raised during this due diligence review must be addressed to the satisfaction of the Company prior to entering the relationship. The amount of time and effort required for due diligence will depend on the number and complexity of issues raised during the review process.

In the event of a merger or acquisition, sufficient due diligence must be performed to assure the Company of the acquisition target's compliance with applicable anti-corruption laws, including the FCPA and UKBA.

### **Recordkeeping and Reporting Requirements**

The FCPA imposes strict accounting requirements on the Company. In particular, the FCPA requires the keeping of accurate books and records that, in reasonable detail, reflect the transactions and asset dispositions of the Company, and the development and maintenance of a system of internal accounting controls including periodic audits. These requirements apply to all payments, not just sums that would be "material" in the traditional financial sense.

Receipts, whether in cash or cheques, will be deposited promptly in a bank account of the Company. Any employee who suspects the possibility that a bribe, kickback or over-

Invoice is associated with a particular receipt or that an understanding exists that all or a portion of a receipt will be rebated, refunded or otherwise paid in contravention of the laws of any jurisdiction, will immediately report that suspicion to the Designated Partners.

Personal funds must not be used to accomplish what is otherwise prohibited by this policy.

### **Training**

The Company will conduct periodic anti-corruption training for all and, where appropriate, employees, agents and business partners. Failure to participate in such training may be cause for disciplinary action, up to and including termination of employment or termination of a third party's contract.

### **Accountability: Roles and Responsibilities**

The roles and responsibilities with regard to the Company's anti-corruption compliance are as follows:

- The Designated Partners has ultimate responsibility for ensuring that the Company meets its obligations under Applicable Corruption Laws. They have the rights in:
  - Identifying and interpreting this policy, the FCPA and other anti-corruption laws, rules and standards
  - Drafting related policies and procedures
  - Advising Company personnel on any legal issues related to adherence to the Company's compliance program
  - Coordinating anti-corruption education and training

### **Reporting Violations**

Any Designated Partner or employee who suspects a violation of this policy must immediately report such suspected violation. The Designated Partners reserves RIGHTS to amend, include, and delete any or section of the above said policies. Further, in accordance to any impacting Legislations, new Policies will be added to this Organizational Policy.

## Policy 5: Data Protection Policy

We hereby commit to treat information of employees, clients, stakeholders, and interested parties with utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights. This policy refers to all parties (employees, job candidates, clients, suppliers etc.) who provide any amount of information to us.

### Policy elements

As part of our operations, we need to obtain and process information. This information includes any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, financial data etc. Our company collects this information in a transparent way and only with the full cooperation and knowledge of interested parties. Once this information is available to us, the following rules apply.

| <u>Our data will be</u>                                                                                                                                                                                                                                                                                        | <u>Our data will not be</u>                                                                                                                                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• Accurate and kept up-to-date</li><li>• Collected fairly and for lawful purposes only</li><li>• Processed by the company within its legal and moral boundaries</li><li>• Protected against any unauthorized or illegal access by internal or external parties</li></ul> | <ul style="list-style-type: none"><li>• Communicated informally</li><li>• Stored for more than a specified amount of time</li><li>• Transferred to organizations, states or countries that do not have adequate data protection policies</li><li>• Distributed to any party other than the ones agreed upon by the data's owner (exempting legitimate requests from law enforcement authorities)</li></ul> |

**In addition to ways of handling the data the company has direct obligations towards people to whom the data belongs. Specifically, we must:**

- Let people know which of their data is collected
- Inform people about how we'll process their data
- Inform people about who has access to their information
- Have provisions in cases of lost, corrupted or compromised data
- Allow people to request that we modify, erase, reduce or correct data contained in our databases

### **Actions**

To exercise data protection, we're committed to:

- Restrict and monitor access to sensitive data
- Develop transparent data collection procedures
- Train employees in online privacy and security measures
- Build secure networks to protect online data from cyber attacks
- Establish clear procedures for reporting privacy breaches or data misuse
- Include contract clauses | communicate statements on how we handle data
- Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

Our data protection provisions will appear on our website.

### **Disciplinary Consequences**

All principles described in this policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.

For **HR Vidyalaya Corporate Services LLP**

**(S Anandan)**

**(G Sasikala)**

**Designated Partners of HR Vidyalaya Corporate Services LLP**