

## **Disciplinary Actions Policy**

### **TIRUPATI REELS PRIVATE LIMITED**

### **DISCIPLINARY ACTIONS POLICY**

# Disciplinary Actions Policy

## 1. Purpose

- 1.1. The policy aims to establish a positive conduct and take corrective actions against the employees for violation of the Company's Code of Conduct, Whistle Blower policy, Policy for Prevention of Sexual Harassment (PoSH) or any other policies of the Company.
- 1.2. The guidelines of this policy are designed to provide guidance to an employee and the management to act in a consistent manner when an employee fails to comply with the codes and policies laid down by the Company or an employee's conduct and workplace behaviour fails to meet expectations.
- 1.3. This policy does not contain an all-inclusive list of misconducts and appropriate assignment of disciplinary action since circumstances and incidents will vary on a case-to-case basis.
- 1.4. Our approach to the resulting disciplinary action is consistent and fair based on the nature, severity and frequency of the violation / misconduct.
- 1.5. This policy is framed to uplift and promote action that will help employee to bring about improvement.
- 1.6. The disciplinary action can range from a verbal or written warning to demotion, suspension or even Exit from the Company.

## 2. Scope & Applicability

- 2.1. All employees on the rolls of Tirupati Reels Private Limited or any of its subsidiaries, contractual employees or third-party employees, fixed term contract employees, Retainers.
- 2.2. Exclusions – Independent and Executive Directors.

## 3. Illustrative List of Violation of the Code or Misconduct

Corrective action may be taken if the Employee display any of the below prohibited actions. This below list shows examples of what constitutes misconduct and is not exhaustive.

- 3.1 Minor Misconduct: This applies where it is alleged that there is some fault or blame on the part of the employee concerned. Misconduct can include, but will not be limited to,
  - i. indulging in verbal abuse,
  - ii. failure to effectively monitor the actions of people managed by the Employee.
  - iii. persistent poor timekeeping, insubordination
  - iv. habitual absence without leaves
  - v. disruptive behaviour
  - vi. failure to participate in required training or compliance process
- 3.2 Serious Misconduct: – Serious misconduct includes, but is not limited to, below incidents or actions:
  - i. Violate the Company Code of Conduct, Company policies and procedures, or applicable laws or direct others to do the same
  - ii. Failure to report any known violation
  - iii. Failure to cooperate in a Company investigation or audit.
  - iv. Retaliate against someone for reporting a concern or participating in an investigation.
  - v. Leak information learned during an ongoing investigation
  - vi. Wilful insubordination of Employee's manager or senior over a reasonable task related to work
  - vii. Going on an illegal strike, or abetting, inciting, or instigating or acting in furtherance thereof
  - viii. Wilful slowing down in work performance or wilful negligence at work
  - ix. Indecent behaviour, theft, and damage to Company's assets
  - x. Compliance and Integrity violations
  - xi. Sexual harassment including unwelcome sexual determined behaviour (direct or implied) – Physical contact and advances, demand or request for sexual favour, sexually coloured remarks, showing pornography, and any other unwelcome physical, verbal, or nonverbal conduct of sexual nature.

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## 4. Guidelines

- 4.1. Acts of misconduct or inappropriate behaviour as described in clause 3, shall entitle the Company to initiate disciplinary proceedings and can lead to disciplinary action which may also lead to exit of the employee from the Company .
- 4.2. All cases of serious misconduct would be forwarded to the Whistle Officer for necessary investigations.
- 4.3. All cases related to sexual harassment at work will be forwarded to the applicable Internal Committee (IC).
- 4.4. All matters, not amounting to serious Misconduct, will be referred to BU Head and Legal.
- 4.5. In the event, that an employee is party to multiple violations of the Code and policies, the management reserves the right to review all or some of it through a single procedure or more.
- 4.6 A copy of any such incident shall be forwarded to the Whistle Officer for their records.
- 4.7 The BU Head shall be responsible to provide the Whistle Officer prompt updates and conclusions of the matter for record.

## 5. Disciplinary Committee:

A Disciplinary Committee (DC) shall consist of following persons:

1. Chief operating officer
2. DGM-HR & Admin IR
3. Company Secretary & Compliance Officer (CS & CO)
4. DGM-Accounts & Treasury
5. Any other functional head - Purchase

DC shall be constituted for deciding DA to be taken on Human Resource matters.

. Functions of the DC are as follows:

- i. To review all complaints and their investigation reports, as the case may be, for initiating disciplinary proceedings received by it.
- ii. Prescribe the process to ascertain facts on case to case basis
- iii. To issue show cause notice based on the facts.
- iv. To seek and take possession of all assets and documents in possession of the Employee for conducting investigation.
- v. Appoint requisite third party consultants as may be required by the DC.
- vi. To call for personal appearance of the requisite employees and to record their oral submissions.
- vii. Ensure maintenance of necessary records of all the cases received and processed.
- viii. Deal with any other matters that may be required.

### 1. Severity Categorization

Minor Severity Incidents - An incident shall be categorized as 'Minor Severity' if it is ascertained that it has occurred unintentionally and that such incident(s) was unusual and outside the scope of normal business practices and that it has not resulted in a cognizable and negative impact.

Medium Severity Incidents - An incident shall be categorized as 'Medium Severity' if it is ascertained that it has occurred consciously and that such incident(s) has resulted in a cognizable and negative impact. Unintentional incidents based on severity and impact may be categorised as MSI based

The CMD/Executive Director shall be the final authority to ascertain the severity of an incident and his decision shall be final and binding.

Major Severity Incidents: An incident shall be categorized as 'Major Severity' if it is ascertained that it has occurred consciously/repeated in spite of previous communication, and beyond the reasonably accepted scope of business practice, thus resulting in a significant negative impact.

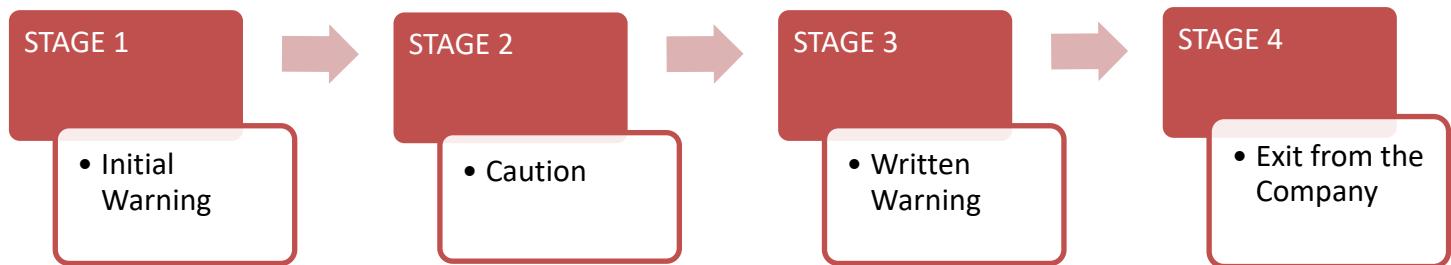
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## 2. Nature of Disciplinary Actions and its impact

Severity Category	Disciplinary Action	Promotion / Growth	Annual Salary / Increment	Bonus / Variable Payout	Full & Final procedure
Minor	Verbal Warning	No Impact	No Impact	No Impact	No Impact
	Caution	BU / Function Head discretion + HR review	BU / Function Head discretion + HR review	BU / Function Head discretion + HR review	BU / Function Head discretion + HR review
Medium	Warning	Not Eligible	Not Eligible	Not Eligible	No Impact
Major	Exit from the Company	Not Eligible	Not Eligible	Not Eligible	HR Review

## 3. Procedure

Pursuant to the decision of DC, as the case may be, below procedure shall be followed for the implementation of Disciplinary Action.



### 8.1. Stage 1: Initial Warning

- i. Reporting Manager will issue a initial warning to the employee via email or giving detailed background note of the incident and show cause notice
- ii. The CHRO and Skip level manager must be a part of such email or notification
- iii. This record will be placed in the employee's personal file

### 8.2. Stage 2: Caution

- i. Repeated misconduct after verbal warning will result in a Caution
- ii. Reporting Manager in consultation with Business HR will initiate counselling and issue show cause notice to the employee with a document / note /email recording the incident
- iii. The CHRO and Skip level manager / Whistle Officer must be a part of such email or notification
- iv. This record will be shared with the employee and will be placed in their personal file
- v. Depending on the nature and seriousness of the misconduct, the employee could be issued a warning letter directly by skipping the initial warning stage

### 8.3. Stage 3: Warning

- i. Repeated or gross misconduct after Caution will result in a Warning
- ii. The BU Head / Function Head and CHRO will record the warning in the form of a warning letter (Annexure 1)
- iii. This Letter contains nature of the misconduct, nature of the corrective action expected, appropriate duration till when the warning will remain active, and likely consequences
- iv. This letter will be shared with the employee will be placed in their personal file
- v. Depending on the nature and seriousness of the misconduct, the employee could be issued a Warning directly by skipping the initial warning and show cause notice stages

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## 8.4. Stage 4: Exit from the Company

vi. Based on the decision of DC on the manner of exit of employee, CHRO will prepare appropriate communication which will be reviewed by the Legal team before being issued to the employee and placed in the personal file

8.5. Certain violations of the Code and Policies of the Company may require involvement of law of the land. In such cases, the Company will cooperate with the relevant authorities and provide them relevant information to the extent necessary.

## 9. Assigning the Appropriate Disciplinary Action

Employee / Manager receiving / raising the concern together with requisite details and evidence of the incident shall forward the complaints to Whistle Officer

Categorisation of the incident based on the conduct and referring the matter for investigation to ICC / HR / Respective BU Head / Whistle Blower Committee (WBC)

Investigation of the Complaint and report shared with Disciplinary Committee by ICC / HR / Respective BU Head / WBC

Disciplinary Committee reviews the investigation report of HR / WBC and recommends Disciplinary Action (DA). ICC to refer to DA policy for deciding the disciplinary action

HR initiated steps to implement action and issues the letter / mail / document to the employee

## 10. Appeals Procedure

vii. 10.1. The aggrieved employee may appeal to the CMD in writing / email within 5 days of the receipt of the result of the disciplinary action.

viii. 10.2. The decision of the CMD will be final and binding.

## 11. Disciplinary Records:

Record and files of all the employees against whom disciplinary action is taken should be made and preserved for a minimum period of 8 (Eight) years from the last date of their exit.

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### **Annexure 1 (on Company Letterhead)**

This is in reference to the investigation conducted by Tirupati Reels Private Limited (Company) wherein you were found to have violated the Company's Code of Conduct.

As per the investigation, you were found to have done \_\_\_\_\_.

The above act constitutes breach / negligence on your part in performing your duties. As per the Company's Disciplinary Action Policy, you are hereby issued this Caution Letter.

In the future you are requested to exercise caution while conducting yourself and business activities.

For & On behalf of

Tirupati Reels Private Limited

### **Annexure 2 (on Company Letterhead)**

This is in reference to the investigation conducted by Tirupati Reels Private Limited (Company) wherein you were found to have violated the Company's Code of Conduct.

As per the investigation, you were found to have done \_\_\_\_\_.

The above act constitutes breach / negligence on your part in performing your duties. As per the Company's Disciplinary Action Policy, you are hereby issued this Warning Letter.

This is the final warning being issued to you. Should you be found guilty of any misconduct in the future, a stricter action can be initiated against you.

For & On behalf of

Tirupati Reels Private Limited

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