

EMPLOYEE HANDBOOK

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The **PINC** Edge
Research, Relationships, Resilience.

Welcome to **PINC** !

We are very happy to welcome you aboard and thank you for joining us!

PINC is committed to its approach of Innovation, Integrity and Insight. We are sure you as a part of the PINC family will strengthen our power to provide this more effectively.

We assure you that excellence in the work place will result in a rewarding career for you, and will find satisfaction and take pride in your work here.

This Employee Handbook is presented as a matter of information and has been prepared to inform you about the Company's philosophy, employment practices, policies, the benefits provided to you as a valued employee, as well as the conduct expected from you. While this handbook is not intended to be a book of rules and regulations, it does include some important guidelines about which you should know.

The **PINC** Edge
Innovation, Integrity, Insights.

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ABOUT THE COMPANY

Bright Thinking® for a Progressive Future

Pioneer Investcorp Ltd. (PINC) is an integrated mid-market focused financial services company. For the last three decades we have been serving the needs of corporates, institutional & government clients and family offices with professional advice, integrity and speed.

We offer a wide range of customised services, including investment banking, private equity advisory, debt syndication, M&A advisory and institutional securities trading. Our foray into risk and insurance advisory services demonstrates our ability to leverage our relationships and domain knowledge to cross-sell products and offer value-added services to clients.

VISION & PHILOSOPHY

Our Business Philosophy

- To conduct ourselves with integrity, transparency and highest ethical standards.
- To act as a dedicated and trusted financial advisor to our clients for their strategic business needs by providing domain expertise and access to strong relationships.
- To build enduring, mutually beneficial and successful relationships with clients by conducting our business with integrity and having a 'client first' approach.

Our Vision

To be the most preferred financial services firm trusted by customers for providing customised and structured solutions with innovation and integrity.

Our Mission

To achieve the highest level of client satisfaction by creating value for clients through a professional approach and ethical dealings.

We Believe In



Client Satisfaction We believe that satisfied clients enable our success. So, we place client satisfaction at the top of everything we do.



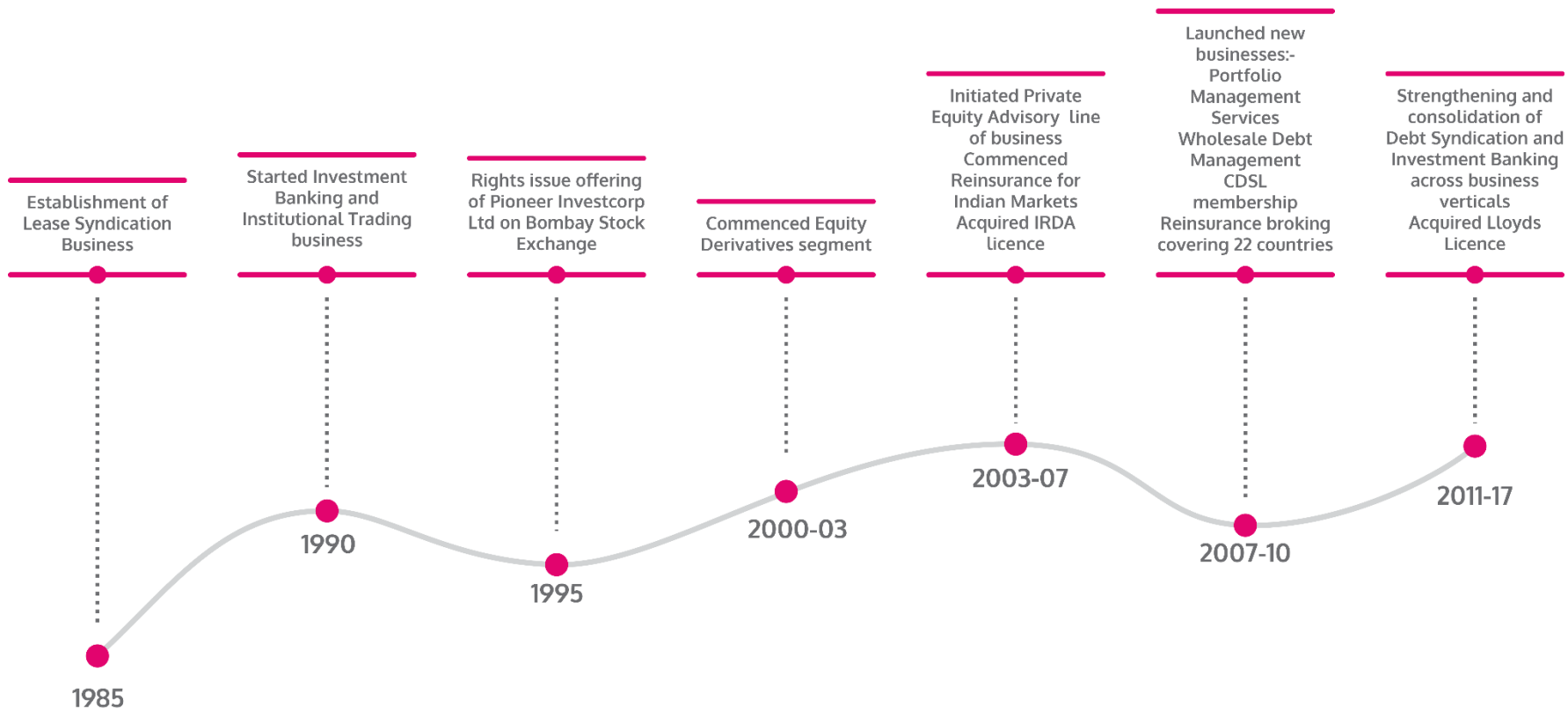
Integrity We believe integrity is the keystone of all business relationships. Hence, we remain truthful, transparent and forthright in our dealings with stakeholders



Innovation We believe we must provide our clients with innovative solutions. Therefore, we use our skills, experience and problem-solving capabilities to provide creative yet practical and cost-effective solutions.

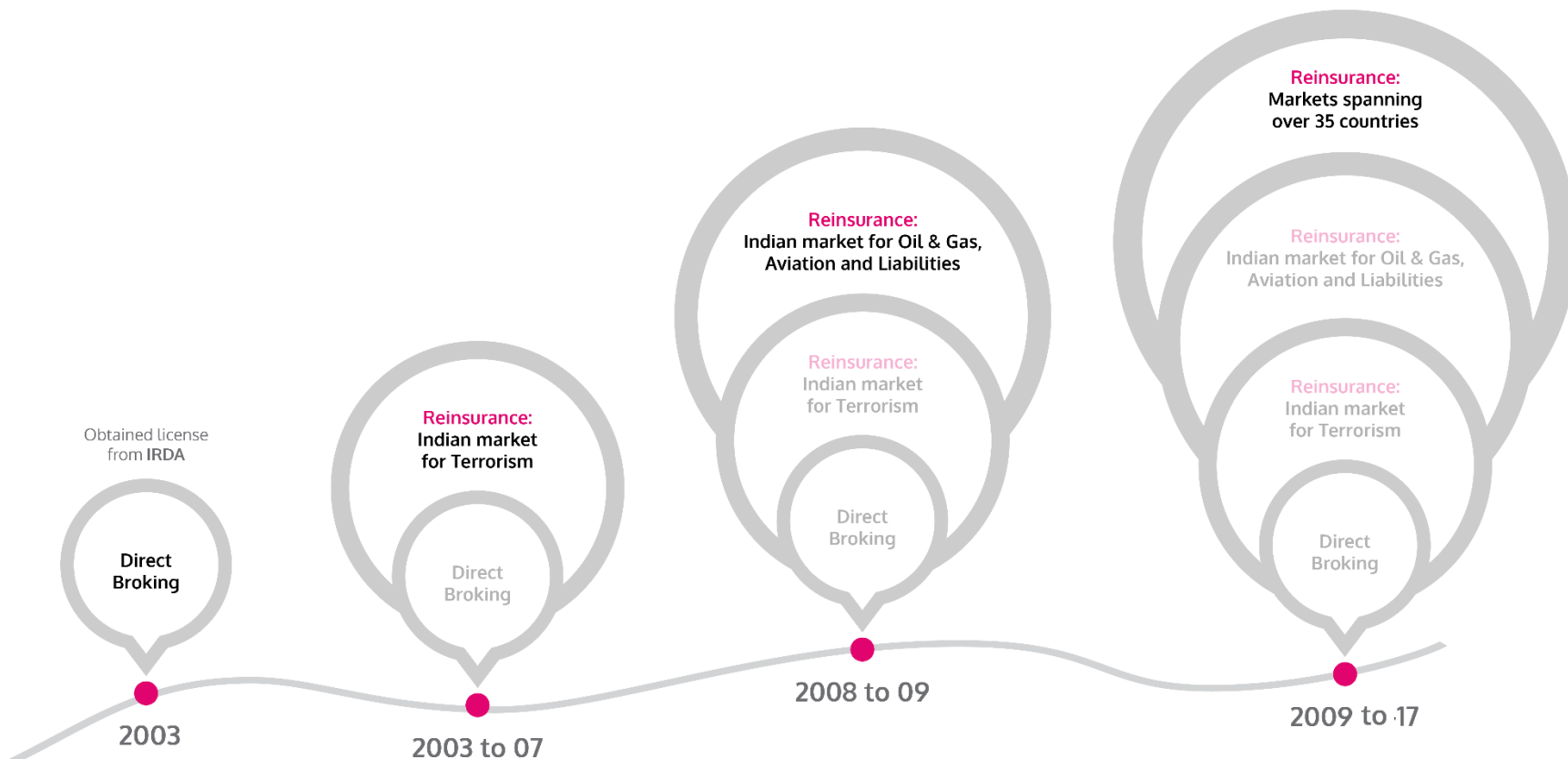
GROUP HISTORY

Our Journey so far...



PINC INSURE

The Company prides itself in pioneering innovative solutions in insurance and reinsurance, suited to adapt to the needs of individual clients / markets.





MESSAGE FROM THE MANAGING DIRECTOR

*“Success is no accident.
It is hard work, perseverance, learning studying,
sacrifice and most of all, love of what you are doing”
- Pelé*

At Pioneer our people are our greatest asset. In other words, we are a people's organisation. Because happy employees make happy clients. Every single policy here is formulated to keep you at ease, ensuring you give your best every single day.

When you give your best, you tend to motivate not just your team but everybody around you thus, fostering positivity and happiness in the organisation, leading to smooth functioning of the system.

Wishing you great success!

A handwritten signature in black ink, appearing to read 'Gaurang Gandhi', with a date '24' written below it.

Gaurang Gandhi
Managing Director

OUR GROUP LEADERSHIP TEAM



Hemang Gandhi, *Director*

Location: Mumbai

E-mail: hemangg@pinc.co.in



Sushant Kumar, *Director & CEO*

Location: Mumbai

E-mail: sushant.kumar@pinc.co.in



Ketan Gandhi, *Director*

Location: Mumbai

E-mail: ketang@pinc.co.in



Sandeep Shenoy, *Executive Director - Equities*

Location: Mumbai

E-mail: sandeep.shenoy@pinc.co.in



Jeevan Adya, *Director*

Location: Bangalore

E-mail: jeevanadya@pinc.co.in

OUR GROUP LEADERSHIP TEAM



Sathish Mathur, *CEO & Principal Officer*

Location: Mumbai

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Sanjay Kabra, *CFO & Compliance Officer*

Location: Mumbai

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K. Gopinath, *Head - Energy & Aviation*

Location: Mumbai

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Rahul Chauhan, *Head - Direct Insurance*

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PR Dalal, *Head - Claims*

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Akshay Kamath, *SVP - Reinsurance*

Location: Gift City

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Shreyas Ganatra, *Head - Infra & Projects*

Location: Mumbai

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Dipen Gandhi, *VP - Reinsurance*

Location: Gift City

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CODE OF CONDUCT

Responsibility of an employee

- ❖ Maintain discipline and decorum in the office and or if representing the company on Business visits / Client visits.
- ❖ Maintain a healthy and happy environment at work.
- ❖ Extend support & respect your colleagues / subordinates /acquaintances at work.
- ❖ Stay Green. Save paper. Print only if required, print front and back, reduce the font if possible.
- ❖ Help us Recycle paper! Please put unwanted paper in recycle bins, instead of trashing it.
- ❖ Use filtered water and not bottled.
- ❖ Maintain cleanliness in and around office.

PINC is your family too, so lets work together to make it the best place to work!

“you don’t build a business,
you build people.
And then people build the business.”
- Zig Ziglar

HR Policies

Fact : ‘You are the People’

ATTENDANCE & LEAVE POLICY



Objective

- ❖ To streamline and regulate the attendance of all the employees in the company.
- ❖ To bring absolute discipline at work.

Scope

This is applicable to all employees of the organization.

Working days & hours

- ❖ The working days for Office staff is 5 days, i.e. Monday to Friday with Saturday & Sunday being weekly off.
- ❖ The office timing would be from specified by your reporting manager or HR on your joining day.
- ❖ The leave quota of an employee comprises of 30 days of standard leave starting from April to March.

Process

Every Employee irrespective of level is expected to record their attendance at the biometric machine, first in and last out.

Late Arrival

- ❖ Employees are given 10 minutes every day as grace minutes. Employees reporting for duty after the 10 minutes of grace period will be considered "**Late**". So if an employee's office timing is 09.30 am, and the employee punches attendance for a day at 09.41am, he/she is 11 **minutes late**.
- ❖ Such 3 late marks would be considered as half day.
- ❖ These half days will be subtracted from the leave quota. If during the year, the leave quota is exhausted, the employee then will have to go on leave without pay, in case if any.

Half Day

- ❖ Attending office from 9.30/10 am to 2pm; or 2pm to 6pm will be considered as half day.

Leave

- ❖ It is expected that the employee takes prior approval from their respective HOD/Reporting Manager for the leave to be taken, submit the leave application form / email for sorts of leaves to the HR Department.
- ❖ In case of a sudden leave, employee should intimate respective HOD/Reporting Manager & HR department on the day of resuming work. Informing subordinate or colleague cannot be treated as intimating HODs.
- ❖ The HR Department shall treat it as 'on leave' from duty unless authorized leave application is obtained within given time frame.
- ❖ No Sandwich days. i.e. if someone takes leave on Friday and Monday, its considered as 2 days leave (not 4 days).

Leave Application Form

- ❖ The Leave Application form is available online. Please ask HR to share the link with you. Submission & approvals of Leaves to happen online through the HRMS software (**Annexure D**).
- ❖ All employees are expected to take prior approval on **Leave Application Form** before proceeding on Leave. They should notify their Managers for taking any leave and apply for the leave being availed at least 2 weeks in advance.
- ❖ In case of unplanned leaves (Casual/Sick Leave); inform your manager well in advance before the business day starts. This should be followed by completing the Leave Application Form immediately on resuming duties.
- ❖ Based on the Organization's business needs, the employee's Manager may/may not adjust the employee's proposed leave schedule. The Manager may request that the leave be taken at a different time so that proper business operations are not hindered.
- ❖ Requests for extension of leave due to unforeseen circumstances should be conveyed to the Manager promptly and approval obtained.
- ❖ The approved Leave Application Form must be sent across to Human Resources. If for any reason prior approval could not be taken; the process must be followed immediately on resuming duties.
- ❖ Please note that Adherence to Leave Policy is the responsibility of both the employee and the immediate Manager.

Holiday List

The annual calendar department holiday list will be shared by the HR over email on your joining us.

SUMMARY

- ❖ Office timing: 9:30am to 6:00pm
- ❖ Grace period: 9:30am to 9:40am
- ❖ Leave quota for every employee is of 30 days for the period of April to March.
- ❖ 3 late marks would be considered as half day off (the same will be deducted from the 30 days leave quota)
- ❖ Only email intimation will be accepted.
- ❖ No SMS/ Whatsapp intimation regarding leave/late coming/meeting will be entertained.
- ❖ No complacency from employees expected.

ENFORCEMENT

The policy is in force.

MATERNITY BENEFITS



Maternity Benefits Act 1961

Objective

Maternity Benefit (Amendment) Act, 2017 Is Effective From 1 April 2017. An Act to regulate the employment of women in certain establishments for certain periods before and after child-birth and to provide for maternity benefit and certain other benefits.

Eligibility

As per the Act, to be eligible for maternity benefit, a woman must have been working as an employee in an establishment for a period of at least 80 days in the past 12 months; preceding the date of her expected delivery.

Application

The Maternity Benefit (Amendment) Act regulates paid maternity leave entitlement and other related benefits for women employed as below:

❖ Paid Maternity Leave

The MB Amendment Act has increased the duration of paid maternity leave available for women employees from the existing 12 weeks to 26 weeks. Under the MB Amendment Act, this benefit could be availed by women for a period extending up to 8 weeks before the expected delivery date and remaining 18 weeks can be availed post childbirth. For women who are expecting after having 2 children, the duration of paid maternity leave shall be 12 weeks (i.e. 6 weeks pre and 6 weeks post expected date of delivery).

❖ Maternity leave for adoptive and commissioning mothers

The Maternity Benefit Amendment Act extends certain benefits to adoptive mothers as well and provides that every woman who adopts a child shall be entitled to 12 weeks of maternity leave, from the date of adoption.

❖ Work from Home option

The Maternity Benefit Amendment Act has also introduced an enabling provision relating to "work from home" for women, which may be exercised after the expiry of the 26 weeks' leave period. Depending upon the nature of work, women employees may be able to avail this benefit on terms that are mutually agreed with the employer.

❖ Leave for miscarriage

In case of miscarriage or medical termination of pregnancy, a woman shall, on production of such proof as may be prescribed, be entitled to leave with wages at the rate of maternity benefit, for a period of six weeks immediately following the day of her miscarriage or, as the case may be, her medical termination of pregnancy.

❖ Leave for illness arising out of pregnancy

A woman suffering from illness arising out of pregnancy, delivery, premature birth of child, miscarriage, medical termination of pregnancy or tubectomy operation shall, on production of such proof as may be prescribed, be entitled, in addition to the period of absence allowed to her or, as the case may be, to be on leave with wages at the rate of maternity benefit for a maximum period of one month.

❖ Dismissal during absence of pregnancy

When a woman absents herself from work in accordance with the provisions of this Act, it shall be unlawful for her employer to discharge or dismiss her during or on account of such absence or to give notice of discharge or dismissal on such a day that the notice will expire during such absence, or to vary to her disadvantage any of the conditions of her service.

ENFORCEMENT

The maternity benefits policy is in force.

PATERNITY BENEFITS

“Child care is the joint responsibility of both parents”. At PINC, a man is entitled for 10 days of paid paternity leave.

ENFORCEMENT

The Paternity benefits policy is effective September 01, 2018.



SUMMARY

- ❖ Duration of paid maternity leave under normal conditions shall be 26 weeks, as per the revised act, 2017.
- ❖ Duration of paid paternity leave, at PINC, shall be 10 days.

ATTIRE POLICY



Be authentic in what you wear

Objective

To establish broad guidelines and prescribe the dress code while at work, for all employees of the company.

Purpose

- ❖ All employees are properly attired to reflect the high standards of professionalism and customer orientation that the company is committed to pursue.
- ❖ Dress for the personnel in the organization is to be maintained appropriately to reflect the corporate image of the company

Criteria

MONDAY - THURSDAY

- ❖ Dress Type for Male Employees : Full-sleeve Formal Shirts, Trousers, Formal Leather shoes
 - ❖ Dress Type for Female Employees : Indian: Sarees / Salwar kameez; Western: Formal Shirts, Trousers, formal Skirts & dresses upto or below the knee
- Blazer is **COMPULSORY** for all Client Meetings - applicable to all departments (Insurance, Reinsurance, IB, Debt & Equity)

FRIDAY

Informal/Business Casuals for Male & Female Employees

- ❖ Dress Type for Male Employees: Jeans, Collared T-shirts / Casual Shirts
- No ripped Jeans / No Slippers / No Shorts / No gym clothes or sweatpants / Leave your T-shirts with offensive words or sayings in your closet
- ❖ Dress Type for Female Employees: Tops, Jeans, Casual Shirts, Sarees, Salwar kameez, Casual Dresses upto or below the knee
- No ripped Jeans / No short dresses / No Slippers or flip flops / No Shorts / No Crop Tops / No Spaghetti Tops or Singlet / No low-cut blouses / No gym clothes or sweatpants
- IMPORTANT:** If however meetings are scheduled with clients or other business representatives, then formal business attire is compulsory

Business Travel Attire Policy

In a world where first impressions and appearance are everything, adhering to the employee dress code is very important.

Business formal attire, i.e. suits/blazers are mandatory when travelling for Business meetings/conferences, including on Fridays - for both International and domestic travel.

Pins & badges during travel on suit lapels when directed is mandatory.

Guidelines

A Smart Formal dress code is mandatory for the following:

- ❖ Conferences & Seminars where the employee is a representative of the Company
- ❖ Client meetings / visits
- ❖ Internal meetings / trainings

POLICY VIOLATION

- ❖ When an employee disregards the dress code, Supervisors or HR may ask employees to return home to change
- ❖ Or the employee needs to give a justified reason for violation; and the same would be kept on record by H.R. department for future reference
- ❖ Repetition of non-adherence of policy will attract disciplinary action against the employee viz. marking absent for the day.

ENFORCEMENT

The policy is in force.

SUMMARY

- ❖ Monday - Thursday is Business Formals
- ❖ Fridays is Business Casuals, unless someone has a Client meeting / presentation
- ❖ Blazer Compulsory for all Client Meetings - applicable to Insurance, Reinsurance & IB specifically
- ❖ Business formals are essential on all domestic/international travel – meetings & conferences.

ANTI-SEXUAL HARASSMENT POLICY



Objective

PINC is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The objective of this policy is to provide protection against sexual harassment of women/men at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

At PINC, we have zero tolerance for any form of sexual harassment in the workplace. We treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

Definitions

❖ Sexual Harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It can happen both in direct and / or indirect manner. It could be asking something in exchange (Quid Pro Quo) and / or difficult, intimidating and offensive work environment (Hostile Work Environment) that interferes with the work and performance at work. It could be either before and / or after the incident of sexual harassment.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal, through text or email or any form of communication.

Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- ❖ Unwelcome physical contact / inappropriate touching including pushing, grabbing, jostling, and / or attempts to do so
- ❖ Physical violence, including sexual assault
- ❖ The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- ❖ Comments on a worker's appearance, age, private life, etc.
- ❖ Sexual comments, stories and jokes
- ❖ Sexual advances
- ❖ Repeated and unwanted social invitations for dates or physical intimacy
- ❖ Insults based on the sex of the worker
- ❖ Condescending or paternalistic remarks

Non-verbal conduct

- ❖ Display of sexually explicit or suggestive material
- ❖ Sending sexually explicit messages (by phone or by email)
- ❖ Sexually-suggestive gestures, staring, following the person, stalking
- ❖ Whistling
- ❖ Leering
- ❖ This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

❖ Aggrieved person

Any person (employed, associated and visiting the **Company**) who complained of sexual harassment.

❖ Respondent

Any person (employed, associated and visiting the **Company**) against whom aggrieved person complained. 18

❖ Workplace

Includes all offices and branches in the **Company**, all instances reported within the **Company** and in any place visited by the employee arising out of or during the course of the employment including transportation provided by the **Company** for undertaking such journey (if any). It also includes any instance that takes place on or during business trips.

Scope

The policy will extend to all the employees of the Company, permanent and contractual. The policy also extends to those who are not employees of the Company, such as customers, visitors, etc., but are subjected to sexual harassment at the premises of the Company.

Internal Complaints Committee

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least two members will be of the same gender as that of the complainant: (Current nominated members of the committees are given in Annexure A)

- ❖ A woman employee employed at a senior level amongst the employees (**Presiding Officer**)
- ❖ Employee at the level of Managerial level or above from Personnel/HR & Administration Department (**Member**)
- ❖ Divisional Head (**Member**)
- ❖ Member from an NGO or Lawyer (**Member**)

The **committee is responsible for:**

- ❖ Receiving complaints of sexual harassment at the workplace
- ❖ Initiating and conducting inquiry as per the established procedure
- ❖ Submitting findings and recommendations of inquiries
- ❖ Coordinating with the employer in implementing appropriate action
- ❖ Maintaining strict confidentiality throughout the process

PROCEDURE

Filing of Complaint

If any associate believes that he/she has been subjected to sexual harassment, such person may file a complaint with any member of the committee or send an email to icc@pinc.co.in

The committee member on receiving the complaint will intimate the other members of the team, and would arrange for a meeting within one week of receipt of the complaint. Complaints must be brought within 3 months of the incident of Sexual Harassment.

The complainant must submit the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of witnesses, if any. The complaint shall be signed by the Complainant.

If the complaint does not rise to the level of sexual harassment, the Committee may determine to dismiss the complaint without further investigation after consultation with the Legal team.

Process of Enquiry

- ❖ The Committee will ask the complainant to prepare a detailed statement of incidents/allegations. The statement of allegations will be shared with the accused.
- ❖ The accused will be asked to prepare a response to the statement of allegations and submit to the committee within the given time.
- ❖ The statements and other evidences obtained in the inquiry will be considered confidential.
- ❖ The Committee will organize verbal hearings with the complainant and the accused, and other witnesses if any. The committee will ensure that sufficient care is taken to avoid any retaliation against the witnesses.
- ❖ During the inquiry process, the complainant and the accused would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
- ❖ The Committee will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint. Both parties will be given reasonable opportunity to be heard along with the witnesses and to produce any other relevant documents. Upon completion of the investigation, both parties will be informed of the results of the investigation.

The committee will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the committee will also have the discretion to make appropriate interim recommendations in relation to an accused person including suspension, transfer, leave, change or work location etc.

The committee will investigate and prepare an enquiry report with recommendations within 4 weeks.

Decision and Action

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that harassment has occurred; prompt, remedial action will be taken. The committee will evaluate the final findings and details thereof with the appropriate functional head or HR and agree on the applicable disciplinary action. This may include some or all of the following:

- ❖ Restore any lost terms, conditions or benefits of employment to the complainant.
- ❖ Discipline the accused. This discipline can include demotion, suspension, and termination.

The disciplinary action be will be carried out by the concerned HR department. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

ENFORCEMENT

The policy is in force.

SUMMARY

- ❖ The complainant can address the issue to any member of ICC team / HR, and he/she can send an email to icc@pinc.co.in
- ❖ Complaints must be brought within 3 months of the incident of Sexual Harassment.

ANNEXURE - A

Composition of Internal Complaints Committee

S. No.	Name	Designation	Member
1.	Anna Paul	Sr. Manager	Presiding Officer
2.	Sanjay Kabra	CFO & Compliance Officer	Member
3.	Pooja Khandelwal	Manager – HR	Member
4.	NGO member / Lawyer	Will be declared soon	Member

IT POLICIES



Internet Policy - Objective

The Internet policy outlines the guidelines for using our company’s internet connection, network and equipment. We should avoid inappropriate methods and ways which are illegal and creates risks for our company’s legality and reputation.

Scope

This employee internet usage policy applies to all our employees, contractors, volunteers and partners who access our network and computers.

appropriate employee internet usage	inappropriate employee internet usage
<p>Employees are advised to use our company’s internet connection for the following reasons:</p> <ul style="list-style-type: none"> ❖ To complete their job duties. ❖ To seek out information that they can use to improve their work. <p>We expect our employees to exercise good judgement and remain productive at work while using the internet.</p> <p>Any use of our network and connection must follow our confidentiality and data protection policy.</p> <p>Employees should:</p> <ul style="list-style-type: none"> ❖ Keep their passwords secret at all times. ❖ Log into their corporate accounts only from safe devices. ❖ Use strong passwords to log into work-related websites and services. 	<p>Our employees mustn't use our network to:</p> <ul style="list-style-type: none"> ❖ 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 our network and computers. ❖ Perform unauthorized or illegal actions, like hacking, fraud, buying/selling illegal goods and more.

We also advise our employees to be careful when downloading and opening/executing files and software. If they're unsure if a file is safe, they should ask [*their supervisor/ IT manager/ etc.*]

The IT Team shall install the anti-virus and disk encryption software on our company computers. Employees may not deactivate or configure settings and firewalls without managerial approval.

We won't assume any responsibility if employee devices are infected by malicious software, or if their personal data are compromised as a result of inappropriate employee use.

Company-issued Assets

- ❖ We expect our employees to respect and protect our company's equipment. "Company equipment" in this computer usage policy for employees includes company-issued phones, laptops, tablets and any other electronic equipment that belongs to the company.
- ❖ We advise our employees to lock their devices in their desks when they're not using them. Our employees are responsible for their equipment whenever they take it out of their offices.
- ❖ The hardware/equipments belong to the company and must be treated well.
- ❖ They should be submitted to IT for servicing minimum of two times in a year.
- ❖ Twice yearly servicing of laptops is mandatory. A schedule is followed for when your laptops are due.

Emails

Our employees can use their [corporate email accounts](#) for work-related purposes only. Employees shouldn't use their corporate email to:

- ❖ Register to 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.

Our company has the right to monitor corporate emails. We also have the right to monitor websites employees visit on our computers.

Software

To enhance your performance, PINC is now well-equipped with softwares like SAIBA, SARB and other internal softwares built to assist business. Employees are expected to use these softwares on a day to basis for a smooth functioning of the business.

Anytime, a new HRMS software is being introduced for the smooth functioning of the entire organization. It is created to make policies and procedures readily available for employees such as easy access to salary slips, leave status, reimbursements and so on.

Employees are expected to embrace new technologies and move ahead with the times. PINC has an endeavor to make technology part of all the business processes. In this regard, absolute compliance by all employees is mandatory.

Disciplinary Action

IMPORTANT

- ❖ A lot of excess data is stored in employee's inboxes/drives. E.g. there is about 20-25GB found in individual inboxes/drives. This is slowing down the servers and increasing the cost as well.
- ❖ Duplication of saved data has been found on the server. The employee must review the data they are saving/storing.

Employees who don't conform to this policy will face disciplinary action. Serious violations will be cause for termination of employment, or legal action when appropriate. Examples of serious violations are:

- ❖ Using our internet connection to steal or engage in other illegal activities.
- ❖ Causing our computers to be infected by viruses, or other malicious software.
- ❖ Sending offensive or inappropriate emails to our customers, colleagues or partners.

ENFORCEMENT

The policy is effective September 01, 2018.

SUMMARY

- ❖ Timely submission of company equipment to IT for back up and servicing
- ❖ Utmost care to be taken of data confidentiality
- ❖ If found, that data has been deleted, legal action will be taken.

CONFIDENTIALITY & DATA PROTECTION



Objective

Our **Company Data Protection Policy** refers to our commitment to treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality.

With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

Date Storage

Please note, there is a maximum of 15GB storage space available on world client account for each employee. The storage space should be used diligently. For instance, repetition of files, emails should be avoided.

Scope

This policy refers to all parties (employees, job candidates, customers, 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, 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.

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

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 or communicate statements on how we handle data
- ❖ Establish data protection practices (document shredding, secure locks, data encryption, frequent backups, access authorization etc.)

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.

DATA BACK-UP POLICY

It is expected of all Laptop users, to handover their laptop to the IT team, for the timely back-up of data. There is a log that will be maintained with IT as well as HR. The same log report will be submitted to their respective HODs. Any one found, not following the process, disciplinary action will be taken. Also, the IT team will not be responsible if any data is lost / becomes corrupt in due course of time.

REIMBURSEMENT POLICY

Objective

The reimbursements should be claimed by the employees on a regular basis, if any. For claiming the same, forms for Domestic Travel, Local Conveyance, Mobile / telephone and Business Meeting / Business Expense are available on the HRMS. They need to be filled in and submitted online as directed.

Important Instructions: (Refer Annexure B)

- ❖ For Business travel, **the expense claims need to be raised within 10 days of completion of travel**
- ❖ Reimbursement Claims should be only in the Employee Reimbursement Format
- ❖ The formats are formula fed for ease of use
- ❖ The first sheet named 'Main Sheet' is the cover page, which needs to be used for all reimbursement claims.
- ❖ The Annexure B contains specific reimbursement formats like: (request HR, formats are available on email)

Annexure B1: Domestic Travel Reimbursement (Details of Travel and Lodging Expenses)

Annexure B2: Boarding / Other Expenses Reimbursement (Details of Boarding and Other Expenses)

Annexure B3: Local Conveyance Reimbursement (Details of Conveyance Expenses)

Annexure B4: Business Meeting / Business Promotion Reimbursement

For instance:

(a) For Domestic Travel reimbursement, provide specific details in Annexure B1 and fill up the Main Sheet mentioning - employee details, approver's details, necessary approvals (signatures) & the grand total. Attach supportings and submit.

(b) For Mobile Bills reimbursement, fill up the Main Sheet mentioning - employee details, approver's details, necessary approvals (signatures) & the grand total. Attach supportings and submit.

(c) For (standalone) Local Conveyance reimbursement at base location, provide specific details in Annexure B3 and fill up the Main Sheet mentioning - employee details, approver's details, necessary approvals (signatures) & the grand total. Attach supportings and submit.

(d) For (standalone) Business Meeting / Business Promotion reimbursement, provide specific details in Annexure B4 and fill up the Main Sheet mentioning - employee details, approver's details, necessary approvals (signatures) & the grand total. Attach supportings and submit.

*** The Accounts team will not reimburse any expenses for claims prepared on any other formats / petty cash vouchers**

Mobile Reimbursement Policy

As per the revised Mobile Bill Reimbursement Policy, there is a limit set for the reimbursement of your mobile bill with respect to your grade and department. Official/personal calls have to be self certified. All deviations due to business exigencies are to be approved by the business head.

Submission of reimbursement: On a monthly basis, your mobile bill will be reimbursed by the company only up to the limit that is set. In case your bill exceeds the limit, you would receive an email from the finance team to bear the balance expense by yourself. For that you can go to your respective service provider store / or pay online / or through cheque / etc., before the due date to avoid disconnection of your services. Please note the company will not be liable for the same.

The last day for submission of mobile reimbursement to HR is the 7th of every month. Post 7th, reimbursements will not be accepted.

New Connection: One can opt for a new no. from the company, or get their personal no. transferred to the corporate account for CUG (Closed User Group) benefits on tariffs.

Once, the employee leaves, he/she needs to handover the sim card to the HR. In case, the employee wants to continue using the no., they need to collect an NOC from the HR to get the no. transferred into the individual account (not company name). Till the no. does not get transferred to the individual account, the full & final settlement of the particular employee would be kept on hold.

For further, details, please contact HR.

Data card Policy

All the Sales / Marketing employees will be handed over a corporate data card / device along with their laptop on their joining. The data card is a wireless internet connection, which the employees can use on the go whilst travelling for meetings, or at clients location. These devices are issued for the smooth functioning of business and the for the comfort of the employee at the same time.

It is the responsibility of the employee to take utmost care of the device as its being provided by the company. Any data card / device reported to be lost / broken, as a policy the employee will have to bear the cost of the new device. The monthly bill of the device is borne by the company.

**** Reimbursements older than two months will not be reimbursed***

Travel Reimbursement Policy

Domestic Business Travel - Overview

- ❖ The objective is to ensure that employees are able to perform their business tasks in an effective and efficient manner.
- ❖ Policy is extended to the employees of the Company, who travel for Business / Client meetings.

Travel Plan and Approval

- ❖ Employees should plan their business travel well in advance, so as to economise and save on costs.
- ❖ Employees are requested to avoid frequent cancellations.
- ❖ All travel requires prior approval by the designated approving authority (illustrated in the table below). The approval should cover purpose of travel, travel mode, duration and hotel stay, if any.

Level	Role at PINC	Approving Authority
Level 1	Business function Heads at HO / Region Heads / Location Heads	Business Head
Level 2	Roles at HO / Branch Mgr / Sr. Branch Mgr / Territory Mgr / Area mgr	Senior Roles at HO / Region Heads / Location Heads
Level 3	Jr. RM / RM / Sr. RM / other roles at Branch level	Region Heads / Location Heads

Mode of Travel

Road Travel - Corporate Ola/Uber

All the sales & marketing employees, for their business travel / client meetings, are registered to avail the facility of Corporate Ola/Uber benefit. Grade-wise the employees corporate account will be pre-loaded with a monthly balance which can be used for their domestic travel, i.e. for outside Mumbai as well e.g. Ola Rental / Ola Outstation for Mumbai to Pune, Delhi to Chandigarh, and so on. For further assistance, please contact HR / Travel Desk.

Any travel beyond the limit, needs to be borne by the employee for that time, and later claim for reimbursement, with the necessary supporting and approvals. Refer Annexure B for reimbursement form.

Mode	Air	Rail	Road
Class	Economy	AC 2 Tier / AC Chair Car	AC Coach / Cab

Air / Rail Travel - Travel Bookings & Cancellations

- ❖ Air travel bookings must be done through travel desk at Mumbai. Choice of airline / booking of the airline will lie with the travel desk only. The bookings shall be done on the basis of the lowest fare available at that point of time.
- ❖ If any bookings are carried out by the employee, it is the responsibility of the employee to cancel travel reservations. The cancellation should be timely and due to a valid business / personal reason.
- ❖ Any charges arising from the failure to cancel reservations are the employee's responsibility in absence of a valid business reason.

Local Conveyance Expenses

- ❖ As much as possible use Auto, Metered Taxi, Prepaid Taxi, Radio Taxi, Call Taxi or equivalent transport for local conveyance.
- ❖ Hiring of cars in general is more expensive than cabs (Taxi) and therefore must be avoided where cabs are readily available.

Lodging / Boarding Expenses

- ❖ Hotel bookings need to be done through the travel desk. Refer Annexure C - Foreign Budget.
- ❖ Bills should be settled by the employee at the time of check-out. Expenses should be later claimed.
- ❖ It is the employees' responsibility to cancel guaranteed hotel reservations. Any room charges arising from the failure to cancel reservations are the employee's responsibility in absence of a valid business reason.
- ❖ Employees who make their own arrangement for stay shall be entitled to a flat reimbursement in lieu of hotel stay and out of pocket expenses. In such cases except for travel expenses, business meals (with clients / other employees), local conveyance and official telephone calls, no other reimbursement of any nature, including boarding, lodging, laundry and incidental expenses will be allowed.

Business Promotion

- ❖ Business entertainment expenditure if any, needs to be claimed separately.
- ❖ The highest ranking employee should pay for the meal charges involving more than one employee. The practice of a junior employee paying for the meal and a senior employee (present) approve the expenses will be disallowed.
- ❖ Prior approvals are a must. Details of the same need to be put forth on email.
- ❖ Last minute arrangements will not be entertained. If the email intimations / approvals are taken, business promotion expenses will not be reimbursed.

Employee Name	Client / Company Name	Date	Accompanied by	Budget

Travel Settlement

- ❖ Wherever possible, use credit cards to pay for expenses while on business travel
- ❖ Employees are required to settle all travel related claims (i.e. any expense incurred while on business travel – example conveyance, meeting expenses, incidentals, etc.) within 10 days of completion of business travel (i.e. submit bills within 10 days).
- ❖ Travel Expense Statement should be prepared in the prescribed formats (Employee Reimbursements Form)
- ❖ Travel expense statement should be supported by original bills like used ticket counterfoil, boarding passes, hotel bills, restaurant bills, cab bills, etc. to the expense statement in original.
- ❖ In case if transport/hotel is being shared with another employee, the claim should clearly specify the name and employee code of the person travelling/staying with.
- ❖ Even when no amounts are due to be claimed by the employee it is necessary for him / her to settle the travel
- ❖ Travel Expense Statement along with all supporting should be sent to the accounts department at H.O. (Mumbai)
- ❖ It is advisable to keep a copy of the statement and the supporting for records

Expenses, not permissible as per policy:

- ❖ Personal STD/ISD calls from hotel rooms.
- ❖ Liquor, cigarette and beverages.
- ❖ Use of amenities such as health club, gift shops, sauna, steam bath, etc.
- ❖ Mini bar items. Toiletries and other personal items.
- ❖ Membership fees to register for any reward programme.
- ❖ Service, installation and/or repairs cost of personal Mobile phones.
- ❖ Personal credit card annual fees and delinquency/ finance charges.
- ❖ Insurance deductibles for accidents involving personal cars while on company business.

Miscellaneous Expenses

- ❖ Saturday working : the employee needs to bear their food and refreshment expenses by themselves. The same will not be reimbursed. The policy is in force.

International Business Travel

There are certain limits and procedures to be followed for International Business Travel.

Please refer **Annexure C** (limits/forms/templates) for details.

Travel reports to be submitted within 10 days of coming back.

Settlement of Advances (International Business Travel)

All the relevant supportings / expense vouchers need to be submitted within 10 days of coming back, otherwise **advances will be settled from the salary of the following month**, for the respective employee.

Submission & Payments

The last submission date for reimbursements (local conveyance / motor car reimbursement / business promotion / business meetings) is 7th of every month. Post 7th, reimbursements will not be accepted.

Motor car reimbursement will be done by the **15th of every month**, and other reimbursements by the **20th of every month**.

SUMMARY

- ❖ All sorts of reimbursements are to be submitted to the HR only by the 7th of every month, with duly signed and approved by your supervisor / senior.
- ❖ Reimbursements will be cleared by the 15th & 20th of every month
- ❖ Reimbursements older than 2 months will not be reimbursed
- ❖ Prior approvals are essential for all business travel / business promotion
- ❖ Last minute arrangements / requests will not be entertained
- ❖ All the travel bookings to be carried out by the Travel Desk only
- ❖ Employee preference will not be entertained
- ❖ International Business Travel - Advances to be settled from the following month's salary if expense vouchers not submitted within 10 days of coming back.

IMPORTANT KNOW HOW

A. On-boarding

- ❖ HR will be handing certain set of Joining forms, which need to be filled and duly acknowledged by you.
- ❖ The basic documents required as per the checklist are: Aadhaar Card copies, PAN card copies, passport copy, photographs, educational qualification documents, previous organization latest three months salary slips, relieving letter, form 16 (if any), and an update copy of the employee's resume.
- ❖ The ID proof and address proof documents are required for company records (employee file) and for processing of New Corporate Bank account.
- ❖ For Provident Fund account: Personal details (excel sheet to be shared by HR), Aadhaar card copy, PAN card copy and a cancelled cheque (with your name on the cheque) is mandatory.
- ❖ All the documents submitted to HR, need to be self-attested.

❖ Remuneration Details

- i. We follow the Financial year, i.e. April-March.
- ii. Salary is credited on the last working day of the month, into the employee's Corporate Salary Bank Account (which is initiated by the HR at the time of joining).
- iii. For a new joinee, the first salary is handed over in cheque.

❖ Provident Fund

- i. All employees have the option to contribute towards provident fund as per the provisions under the Employees' Provident Fund Act 1952.
- ii. Once an employee chooses to contribute to the same, it would not be possible to opt out of it.
- iii. Employees who were earlier not a PF employee have the option to opt for PF any time during their service with the organisation.

❖ Group Insurance Policies

Following are the group insurance policies provided by PINC to its employees. The coverage/premium will be subject to criteria as per the applicability of the policy. Please note, the premium is borne by the employee. HR will share the details of the same over email.

- i. Group Mediclaim Policy
- ii. Group Term Life Policy
- iii. Group Personal Accident Policy

B. Letters

A company's internal communication is its correspondence between the business and its employees. Employee letters are integral in keeping all those within a company on the same page and on track to meeting their goals. It is used for communicating policies, procedures, disciplinary/code of conduct, Performance appraisal, promotion or demotion, termination letters, recommendation letters are examples of correspondence between employees and their employers.

❖ Probation/Confirmation Letter

A new employee is on a probation period of six months or more, till the employee is confirmed. The same is mentioned in the offer letter issued to the employee upon joining. During the probation period, the objective is to train the employee, check job performance and behaviour, provide time to adapt to new environment.

Before the probation period ends, company/HR/line manager decides whether to retain the person or not. A Confirmation letter is issued to the employee after the employee is successfully retained.

❖ Performance Appraisal Letter

An employee is eligible for performance appraisal only once the employee has completed one year in the particular role/department within the company. They are issued to notify to employees to praise their work performance during the period of one year. Such appraisal letters are given to employees to encourage them for their hard work and motivate them to perform even better for the upcoming year. Employee on a probation period is not eligible for performance appraisal.

❖ Non-Performance or Code of Conduct Warning Letter

An employee is issued a non-performance or code of conduct warning letter which outlines the ethical principles that govern decisions and behaviour at the company and or performance during the year. A timeline is given to improve upon and showcase improvement in performance/behaviour, which will be reviewed on the specific date.

❖ Termination Letter

An official written notification of being fired or laid off. Reasons for ending an employee's employment could include such things as business conditions, a company downsizing, or poor performance in job functions. After a written warning letter, if there is no improvement in the performance/behaviour of the employee, the letter of termination would be issued.

C. Upon Leaving Us

- ❖ Resignation letter in hard copy duly signed needs to be submitted to HR.
- ❖ The details of the notice period to be served, is mentioned on the employee's offer handed over at the time of joining.
- ❖ The full & final settlement takes a minimum of 30-45 days, after the month the employee has resigned.
- ❖ The following needs to be handed over on the last working day:
 - i. Laptop, laptop bag & charger if any
 - ii. Data card if any
 - iii. Corporate Sim card if any, or NOC for transfer
 - iv. All other official paperwork if any
- ❖ It is expected of the employee to not delete any official data/emails on their leaving us.
- ❖ Any data found missing or deleted from the system/outlook, the F&F settlement of the employee would be kept on hold.

Provident Fund

If the employee had opted for Provident fund during his/her tenure at PINC, they are eligible for two options, Withdrawal / Transfer of the PF funds. The employee should request HR to help with the forms at the time of retiral from PINC.

Gratuity

- ❖ All permanent employees who have completed 5 years of continuous service with the Company are entitled to Gratuity on termination, retirement, resignation or in case of death or disablement.
- ❖ Gratuity is calculated as follows: Last per month Basic salary x 15 x No. of years of service / 26 days.

For further details, please contact HR.

INVESTMENT PROOFS / SUPPORTINGS

Flexible Plan Allocation and Income Tax Planning for a Financial Year

- ❖ At the beginning of the financial year, when the employees need to do their tax planning for the Financial an IT declaration form for the FY is shared by HR, where the employee can declare their probable investments allocation that the plan to do for the year, in terms of saving their tax.
- ❖ Please note:
- ❖ Payroll and tax calculation would be done according to the written and signed declaration duly submitted by the employee in the month of April
- ❖ Please note that the declarations need to be made afresh. Previous year's flexible plan allocation and tax declaration will not be used for payroll and tax calculation.
- ❖ Incase one needs to change their salary structure, e.g. change the PF option* or opt for Car reimbursement / LTA / food card, can be revised only twice a year, i.e. April and October.
- ❖ Any other changes will not be accepted during the FY.
- ❖ December first week, the HR sends an email for submission of Investment proofs and supporting that the employee had declared in the month of April to save their tax on income.
- ❖ There is an undertaking form that needs to be submitted duly signed by the employee along with the documents, saying the documents are genuine, and it is the liability of the employee. The supporting submitted, should also be self-attested by the employee.
- ❖ Documents received first week of January, will not be accepted. Tax will be deducted accordingly, for Jan/Feb/Mar.
- ❖ Future investment proofs, should be submitted maximum by the 1st week of March. If investments are due end of March, an advance payment for the same can be done incase the employee wants to get the exemption within the same financial year, or else the employee can claim the benefit at the time of individual filing.
- ❖ Form-16 for the FY is issued by the 3rd and or by last week of May.

For any further queries, please contact HR.

UNDERTAKING

I, hereby, confirm that I have thoroughly read the employee handbook, and promise to follow the rules and regulations, procedures of the company. I agree not to reveal to any person, unless authorised in writing to do so by PINC, or as required by law, any confidential or proprietary information, or any other information belonging to PINC. I promise to contribute to maintain the decorum of the company within the office premises, as well outside whenever I represent the company.

(Full Name & Signature)

(Location)

(Department)

*Request you to please submit this Undertaking, duly acknowledged by you to the HR by the 15th of August, 2018. Strict action will be taken, if HR does not receive the undertaking in time.
For any further queries, please contact HR.*

ANNEXURES

- **Annexure A (ICC Team attached Pg. No. 22)**
- **Annexure B (Reimbursement forms) <http://pinnews.co.in/hr/>**
- **Annexure C (International Travel) <http://pinnews.co.in/hr/>**
- **Annexure D (Leave Application Form) <http://pinnews.co.in/hr/>**

Thank you