

Human Resource – Standard Operating Procedure/ Business Conduct Guidelines



This document is aimed to formulate the HR Policies and Processes set for the company and it's people. This document will be treated as an HR Manual, HR SOP and a Business Conduct Guideline for the company.

Mani Casadona Building
Office No. 5ES5, 5th Floor,
East Tower, New Town,
Kolkata - 700156

+91 33 40051635

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Orion & Founder Directors



Employees	Designation	Modify	View	Document Classification
Mr. Sanjeev Kothari	Founder Director	√	√	Confidential
Mr. Manish Agarwal	Founder Director	√	√	Confidential
Mr. Arijit Majumder	GM - HR	√	√	Confidential
Rest Employees	-	×	√	General



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Human Resource Manual



Mission
To ensure empowerment and sustainable livelihood through holistic skilling, guidance and counseling; to cater to corporates through end to end recruitment and staffing solutions.

Vision
To be the most preferred and sought after provider of training and development services for business, soft skills & placement.

Core values
Believe in building trust & meeting commitments.

Quality policy
We are committed to satisfy our students, by providing relevant training and education to empower their future and be self-reliant in their respective vocation.

We are also committed to review and update ourselves continually to achieve our quality objectives and fulfill all relevant statutory and regulatory requirements.

Human Resource Policy-

Quality Statement :

With the mission to ensure an employee friendly, motivated and safe workplace environment for all the employees of the organization.

What is an HR policy?

A well-structured HR Policy allows employees to understand the rules of working for the organization. It acts as a guide or a framework to govern employee relations. HR Policies and Procedures help managers and employees understand the expectations of the organization and prevent misunderstandings while working together in the same premises.

Need for HR policy:

- Gives a clear understanding of company expectations
- Sets proper communication amongst employees
- Clears queries about benefits and policies
- Builds up trust
- Helps foresee growth in one’s career

TALENT ACQUISITION

Talent Acquisition or Recruitment is the department responsible to hire manpower required for various departments of the company basis the need and requirement to executive specific company assigned job/s.

Types of Hiring basis job role :

Broadly Hiring is of two types – Bulk and Lateral

*Bulk is the hiring of **Entry Level profiles** like Trainers, executives till Team Leader profiles.*

*While Lateral is the hiring of **experienced profiles** from Assistant Manager till Vice President.*

Types of Hiring basis Employment Status :

Broadly this is of two types – New Job and Replacement Job.

When a position is created to hire manpower and previously no one was employed in that role or function is defined as New Position.

When there was a previous incumbent who has either resigned, absconded or got transferred to a different location/department then the hiring is considered as Backfill or Replacement Hiring.

Hiring Process :

- 1) *Business team is required to fill up the Job Request Form or JRF and take approval of the LOB Head. For hiring employees for new positions, LOB Head's approval is required. For replacement positions the business team is required to share a fresh requisition with the LOB Head's approval. However, before onboarding, HR team is required to share the joining details with the Founder Directors for approval.*
- 2) *Post LOB Head's approval the JRF is shared with the Talent Acquisition Team for Hiring, this should accompany the Job Description, approved salary range and TAT of position closure.*
- 3) *Hiring team will start sourcing the candidates as per the JRF and JD.*
- 4) *Sourcing Channels – Direct Walkin, Portals, Employee Referrals, Transfers, Advertisements and Consultancies.*
- 5) *Direct Walkin – Candidates who get to know about the opportunity through Word of Mouth or Force Applications. This is most cost effective method of hiring.*
- 6) *Portals – There are paid and unpaid portals who support job posting or browsing resumes of candidates. It is essential for the recruitment team to venture new opportunities and register with most number of unpaid portals like Linked In, Indeed, Quicker, OLX etc to assist sourcing.*
- 7) *Employee Referrals – When employees refer their known candidates for the same company then, the mode is called Employee Referral Sourcing mode. Recruitment team is required to drive this. (Please follow Appendix number 1 for more details and policy pertaining to Employee Referral)*
- 8) *Transfers or Redeployment – During internal transfers one employee is discharged of all his/her responsibilities from a LOB or State or Center and is made to join another LOB or State or Center within the same group. (Please refer to Appendix 2 for more information)*
- 9) *Advertisements – This is an expensive tool where TA team is required to post ads in New Papers, Pamphlets, Electronic Media etc.*

- 10) *Consultancies – Manpower vendors who get contractually bound with the company to deliver manpower for hiring as per requirement.*
- 11) *Following are the Interview Rounds.*

S#	Position	Round 1	Mode of Interview	Round 2	Mode of Interview	Round 3	Mode of Interview	Round 4	Mode of Interview
1	Executives to TL (Kolkata Based)	TA Executive	Face to Face	Vertical Head	Face to Face	LOB Head	Face to Face	Optional	Optional
2	Executives to TL (Outstation)	TA Executive	Online	Vertical Head	Online	LOB Head	Face to Face/Online	Optional	Optional
3	Assistant Manager to Sr. Manager (Kolkata Based)	TA Executive	Face to Face	Vertical Head	Face to Face	LOB Head	Face to Face	Optional	Optional
4	Assistant Manager to Sr. Manager (Outstation)	TA Executive	Online	Vertical Head	Online	LOB Head	Face to Face	Optional	Optional
5	Zonal/Regional Manager to GM	GM HR	Face to Face/Online	Vertical Head	Face to Face/Online	LOB Head	Face to Face	Founder Director	Face to Face
6	AVP and Above	GM HR	Face to Face/Online	Vertical Head	Face to Face/Online	LOB Head	Face to Face	Founder Director	Face to Face

- 12) *TA team will share selection confirmation over mail or will intimate the candidate on spot about the selection and take a joining confirmation over e-mail.*
- 13) *TA team is required to call the candidate min 2 days before joining and collect all the required documents. The documents are checked and to be verified by TA Team and then shared with HR Team.*
- 14) *In case the candidate is hired by the State TA Coordinator then, for Ajeevika LOB there will be an additional interview round taken by the TA Manager at Kolkata, post his/her selection the candidate will be considered fit for joining. For the rest of the LOB selection by State Level TA team is final.*
- 15) *These Outstation candidates are also required to share their joining documents with TA Team at Kolkata who will check and verify before sharing the same finally with HR before the candidate joins for Ajeevika. While for the rest of the LOBs the joining data will be shared by the LOB HR SPOC with Corporate HR Team directly.*
- 16) *TA team needs to track each joining and accordingly close requisition. For Rejoining cases of Assistant Manager and above, approval from either of the Co-Founders is mandatory.*

Pre-Joining Induction Process

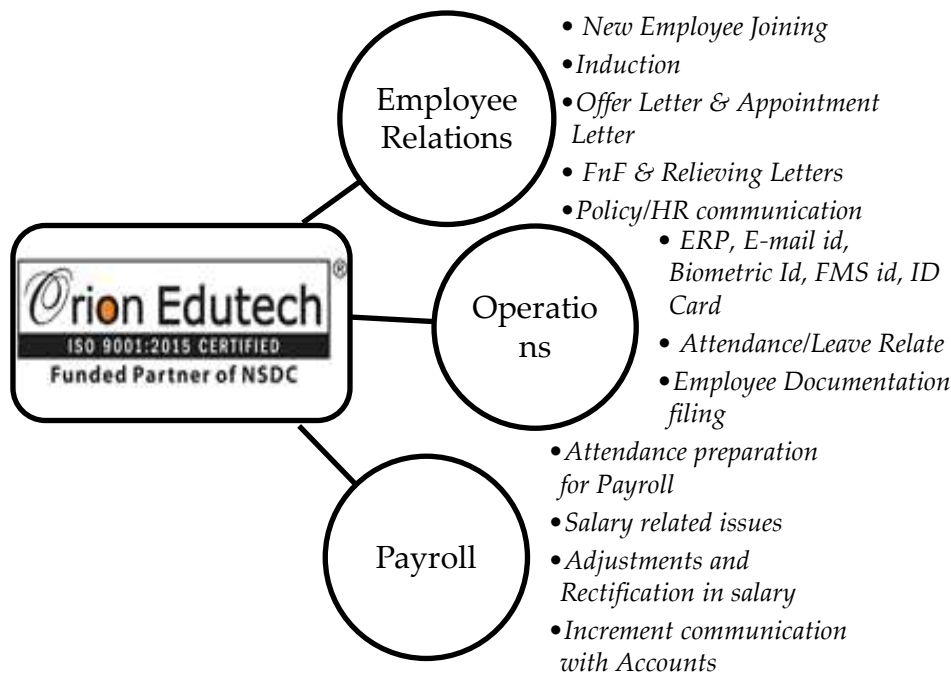
- 1) *Induction will be conducted before an employee joins the company i.e. on the Date of Joining the new joiner will first attend induction and then complete his/her joining formalities.*
- 2) *Once the documents are collected by the TA Team and shared with Corporate HR Team, the Corporate HR Team is required to scrutinize the documents and for any doubts they are required to inform the TA Team and will not process joining, unless doubt is cleared.*
- 3) *Post receiving all required documents and clearing all doubts, the Corporate HR Team will assign Induction date and will share a Welcome Mail with the candidate which contains Induction date and SPOC details and Offer Letter soft copy during non-lockdown period or provision email Offer Letter to be shared along with Welcome Mail if office is closed due to lockdown.*
- 4) *Induction is to be organized on Monday, Wednesday and Friday barring National Holidays, irrespective of geographies. During the event of any Holidays, induction can be arranged on Tuesdays and Thursdays as well.*
- 5) *Corporate HR Team will share Induction details with HR Shared Services Team for onboarding min 48hrs in advance.*
- 6) *HRSS Team will create Employee ids, e-mail ids, Induction ids, FMS Ids and ID Cards. Automated email will be populated to the candidates with the Induction Link.*
- 7) *As per the schedule, the candidate needs to login to the link shared for Induction and appear for the induction. The concerned LOB induction SPOC is also notified about the induction and to ensure that the induction is attended by the candidate also if any first level trouble shooting is required, the SPOC will help the candidate or may inform the HRSS team to support.*
- 8) *The induction is an online process through FMS tool, where the LOB Induction presentation and Induction videos are uploaded. Candidate is required to go through the induction slides and videos to be eligible for the assessment. Candidate gets a full day to attend induction whenever he/she wants however, must complete by the time allotted.*

- 9) Candidate is required to secure min 40% marks in induction assessment to qualify for joining the company.
- 10) In case if the candidate fails to achieve 40% then joining is not ensured. And re-induction is scheduled followed by a reassessment.
- 11) If the candidate secures 40% min in reassessment, then joining is ensured on the same day or if fails retest, then it is the LOB Head's call whether to consider the joining or not.
- 12) If candidate fails to attend induction or complete induction within the stipulated time provided for Induction, then joining is not ensured on the same day and re-induction is arranged on the next business day.
- 13) If the candidate fails to attend re-induction on the same day within stipulated time, then candidature is cancelled. Intimation is shared with the LOB SPOC.
- 14) Post successful completion of induction, HRSS Team allots the induction scores and accordingly, Induction certificates are generated and shared with the candidate, automatically from the portal.

Human Resource

Human Resources is primarily divided into Employee Relations, Operations, Talent Acquisition & Payroll. While Talent Acquisition has been covered already, below are the details of the rest.

Areas of Specialization: Who to approach for what?



Process of issuance of Offer Letter (OL) & Appointment Letter (AL):

- Once the new joining documents are verified and uploaded in the excel sheet, HR will start using the same to prepare Offer Letter and Appointment Letter.
- The documents must reach HR min 2days before joining.

- *OL and AL needs to be prepared in the same day.*
- *Offer Letter or OL needs to be shared before Pre-joining Induction through e-mail.*
- *Appointment Letter or AL needs to have the Induction Scores written before sharing with the employee.*
- *Incase if the candidate is joining in an outstation location then, hard copy OL and AL is required to be shared with the concerned state HR or Regional Office.*
- *For HO based employees the acknowledgement of OL and AL is required to be shared on the same day of the Induction and for Outstationed candidates within 5 Business days the same should reach HR Team so that salary of the employee can be considered from the Date of Induction. If the TAT is deviated then the day HR Team receives the signed documents that day would be considered as Salary start date.*
- *During pandemic lockdown phase Offer and Appointment Letter e-mail acknowledgement can be considered fit for salary start however, hard copy signatures should reach HR Team within 5 business days of sharing these documents.*

Documents for Offer letter:

An employee has to submit the following documents at the time of joining to procure the offer letter:

- 1) *Resume with signature*
- 2) *Passport Sized Photograph*
- 3) *Post Card sized Photograph of Self (if within ESIC bracket)*
- 4) *Post Card sized Photograph of family (if within ESIC bracket)*
- 5) *Last Academic Qualification.*
- 6) *Technical Qualification Documents (If any)*
- 7) *Adhar Card (both sides)*
- 8) *PAN Card*
- 9) *Current address proof*
- 10) *Bank Account details (Cancel Cheque or Passbook)*
- 11) *Marriage Registration Certificate. (Mandatory for married female candidates if she uses husband's surname but Id proves are in maiden name).*
- 12) *Experience Details -*
 - a) *Appointment letter or experience certificate of pervious organizations*
 - b) *Last 3 Months pay slip or Bank Statement*
 - c) *Release letter or resignation acceptance email or letter Resume, if candidate is unable to provide this then a signed self declaration from the candidate is required stating that he has left the previous organization and that he is not engaged in any other organization which may lead to Dual Employment.*
- 13) *E.S.I.C & E.P.F. Form and Joining Format excel*

Anapana :

Anapana is a breathing exercise which relaxes an individual during stress and strain and also increases concentration at work. It is thus, expected that all employees start their day with this exercise for 10mins and can even do the same at home before sleeping. This is a mandatory exercise for all employees and before induction session or in any official event.

Tithing Policy :

General

Employees are expected to follow the noble task of Tithing every month. Following are the people who are eligible to get the Tithing.

- 1) Parents
- 2) Financially challenged Family members
- 3) Financially challenged Friends
- 4) NGOs

Min 10% of the monthly Net Salary needs to be paid as Tithing to one or more of the above mentioned people, every month. Employee may share the bank statement which shows the transfer of funds to above mentioned people, with Accounts team and till the 30th of September 2018 company will reimburse 20% of the 10% net salary of the employee paid as Tithing.

Travel Policy :

The mode of transportation & the cost of transportation have to be updated regularly on the FMS System: www.orionedutech.co.in/fms/login – Please refer to Appendix 4 for more information

The above mentioned url is to be used to upload Travelling Allowances (TA), Daily Allowances (DA), Lodging expenses and FMS expenses. The TA, DA and lodging expenses are to be put in the TA tab while the Other Expenses are required to be put in the FMS portal. Following is the process :

- 1) All Travelling Allowances (TA), Daily Allowances (DA) and Lodging expenses now are required to be uploaded in the TA/DA tool and not the old FMS tool anymore.
- 2) Once the expenses are uploaded the same is sent to the “Checker” and post the checker’s consent, the expense moves to the immediate approver.
- 3) Once the Final Approver approves the expenses, then it is directly sent to Accounts Team for payout, no need to upload the same in FMS tab anymore.
- 4) When employees are on tour they will be eligible for to & fro expenses from guest house to office and can be claimed these under TA. This is effective 1st September 2018.
- 5) However, if employee is travelling from local house to office then he/she will not be eligible for any TA.
- 6) Irrespective of the duration of stay, i.e. 20days, 30days etc, if the concerned location is the base location of the employee then he/she will not be eligible for any TA for travel from guest house to office or vice versa. This is effective 1st September 2018.

When an user logs in to the portal the ‘Home’ page will have an option to download the process and dos and don’ts of the process of uploading in the tool.

Mediclaim:

- On completion of the probation period of 3 months non-ESIC employees are entitled for Mediclaim with a coverage of Rs. 2 Lakhs from IFFCO-TOKIO General Insurance Co. Ltd.
- Employees who are within the ESIC salary bucket however, their reporting states do not have ESIC facility, then those employees are also entitled for Mediclaim facility post they complete Probation period, similar facility will be provided to all employees who have joined Orion Educational Society.
- Employees within ESIC bucket can also register themselves, spouse and kids under mediclaim post completing probation period, if they agree to pay Rs2200 per individual per annum, deducted in equal 12 installments from the employee’s salary.
- To get the benefit for parents, the employee will have to pay an amount of INR 600/- per month for each individual.

Maternity coverage:

The employee or his spouse gets a coverage of Rs. 40,000 for caesarean and Rs. 20,000 for normal delivery.

Group Insurance:

Group Accidental Insurance is also entitled to every employees of the organization from the 1st date of His/Her Joining.

Leave Policy : (Please refer to Appendix 5 for better clarification)

New Leave Policy				
Sl #	Leaves	Orion Leave Count	Calculated Basis	Remarks
1	Priviledge Leave	14	Calendar Year	Eligibility : All payroll employees who have completed 1yr of continuous service. Accumulation : Total 24 leaves can be accumulated in 2yrs, beyond 24 all extra leaves will expire on 31st Dec. Encashment : PLs can only be encashed during FnF or can be adjusted from Notice Period. Clubbing : Can be clubbed with CL and Comp Offs but cannot preceed SL but can succeed SL.
2	Casual Leave	10	Calendar Year	Eligibility : All payroll employees are eligible from Day 1 of service Accumulation : Leaves will expire on 31st Dec if not availed. Encashment : Cannot be adjusted from Notice Period or Encashed. Clubbing : Can be clubbed wiith PL but not SL or Comp Off.
3	Sick Leave	7	Calendar Year	Eligibility : All payroll employees are eligible from Day 1 of service, needs to show valid medical documents if the leave exceeds 2 continuous days. Accumulation : Leaves will expire on 31st Dec if not availed. Encashment : Cannot be adjusted from Notice Period or Encashed. Clubbing : SL cannot preceed CL or Comp Off and cannot succeed a PL or CL or Comp Off.
4	Holidays	14	Calendar Year	Depends on State of Operation
5	Maternity Leave	180	Situational	Max 8 weeks of Pre-Natal and 18 weeks of Post Natal
6	Breavement Leave	13	Situational	Only during the death of Biological Parents
7	Marriage Leave	7	Situational	Allowed for Self Marriage 1st marriage only
8	Paternity Leave	1	Situational	Allowed upto 2 kids only
9	Emergency Leave	15	Situational	In the event of any accident at work place during office hours or extended work premises (eg guest house etc) or during any travel due to official work or during coming to office or returning from office

Separation Policy:

Separation is broadly classified into 2 sub-categories.

Voluntary Separation and Involuntary Separation.

Voluntary Separation : Includes Resignation and Absconding Mode.

Resignation : When an employee decides to resign from his/her current role, has to share a mail with the upline and seek approval stating the reason for the decision and the Last Working Date. As per policy following are the Notice periods from 1st of Nov 2017. Employees joined before 1st of Nov 2017 has a standard notice period of 15days.

Executive to Team Lead – 30days

Assistant Manager to Regional Manager – 60days

Assistant General Manager and Above – 90days

Notice period is not dependent on Confirmation status of the employee i.e. for both Confirmed and Non-Confirmed employees will follow the above rule.

If employee is not adhering to the same then FnF will be hold as per policy. If employee wants to buy off the notice period then he/she has to send a request mail to HR and HR will forward the same to Director HR. If

General

the Director HR allows the buy off then the Notice Period amount will be deducted from total FnF value or the employee will pay the difference value to get the FnF completed and get a relieving letter. As per the new leave policy, the Notice Period days can be adjusted from the available Privilege Leave balance, but approval process remains same. Also this employee will be considered as Non-Rehirable as well as will be considered as Negative profile for Back Ground Verification.

Absconding : When an employee decides not to attend office without any prior intimation or putting a valid resignation. Business team needs to track the employee and try to get him back to office. Also business team is required to intimate HR about the absence of the employee on the 3rd day of continuous absence. HR is required to send an Absconding Warning e-mail on the 4th Business day from the 1st day of Absence requesting the employee to join back within the 10th business day of Absence, if employee responds and decides to join back, then it is okay or else employee may decide to send resignation letter. If there is no response received, then on the 7th Business day, from 1st day of Absence, then HR needs to top up on the 1st AOD Warning email and send the 2nd AOD Warning email, requesting to join back within the 10th Business day, if response received then HR needs to act accordingly, however, if no response received, then on the 10th Business day, HR needs to top up on the 2nd AOD Warning mail, declaring the employee as Absconding on Duty. Please note in all these AOD emails, HR has to mention the implications of AOD. HR is required to block all ids (E-mail, FMS, ERP/biometric etc) and consider the person as Absconding on Duty (AOD) and remove him/her from the active list of employees.

Such an employee will not be eligible for Full & Final Settlements, Relieving letter and will be considered as Non-Rehirable as well and will be considered as Negative profile for Back Ground Verification.

Involuntary Separation : Includes Asked to Leave and Termination.

Asked to Leave : This has been broadly classified into 3 scenario based situation.

Due to Performance/Disciplinary Issues : When an employee is not performing over a period of 60days and is more than 90days old in the system, the management can decide on releasing the employee from the company. Also when an employee is involved in any disciplinary issue and post following the Disciplinary grid, Level 3 is issued, i.e. Separation will be initiated. In this situation employee's notice period to be waived off, he/she will be eligible for only the worked day's salary and leave encashment (if any), relieving letter will be issued. Rehire status would be negative but Back Ground Verification would be Positive.

Retrenchment Policy : When an employee commits any sever disciplinary issue like Sexual Harassment, Sever Damage to company property or any other instance which is detrimental to the business or is evidently found to be involved in an Anti-National or Criminal Activity, that employee can be considered for Termination. Before the same is done the business leader must share an official e-mail detailing the issues and show causing the employee and requesting to respond within 24 to 48hrs, barring the holidays and offs. Post the employee replies the same needs to be shared with HR. HR will form a neutral committee which should include the concerned LOB head, HOD - HR and Business HR Head for review. If the committee finds the reply to be genuine and the employee is released from all charges then, the employment to be reinstated, however, if the committee finds the employee to be a convict, then he/she will be separated with immediate effect. No FnF will be processed however relieving letter to be provided mentioning the reason for Termination. Re-hire check will be Negative and Background Verification status will be negative as well. The investigation needs to be over within 72hrs except for Holidays and Offs. Till such time employee will be on Suspension of Duty status i.e. he/she will be suspended to attend office. Such absence will be treated as Leave without pay if leave balance is not present/exhausted. HR will file the incident in details for legal reasons.

Ramp Down : When the company faces a business challenge like, contract not renewed by the Govt/client, ramp down due to business insufficiency or centers getting closed etc, then the company may decide to optimize the manpower. On such occasion, HR team or high officials of the Business team needs to first try

to redeploy the employee in another business line where the competency of the employee is matching. If redeployment is not possible then the following to be done :

- 1) *Employee to be verbally intimated about the current business requirement and even after trying for redeployment, company is unable to retain the employee.*
- 2) *Employee is required to resign from the current capacity. In this situation effective 17th April 2023,*
 - a) *If employee is more than equal to 1yr old in the system then, business team may provide 30days Notice Period to the employee or may provide 30days full salary as compensation. In the previous case, employees works for 30days and earns the salary as usual and gets time to look for a job, but in the second instance, employee is removed instantly and the full salary he receives can be utilized as a compensation to find a job. FnF process remains same.*
 - b) *If employee is less than an year old in the system, then either 15days notice or 15days full salary needs to be provided. FnF Process will remain same.*
- 3) *Employee will be eligible for salary of working days, compensation (as per eligibility mentioned above), TA/DA (pending if any), PL encashment (if any), Gratuity (if eligible), Release Letter, Background Verification will be positive and Employee can be rehired.*

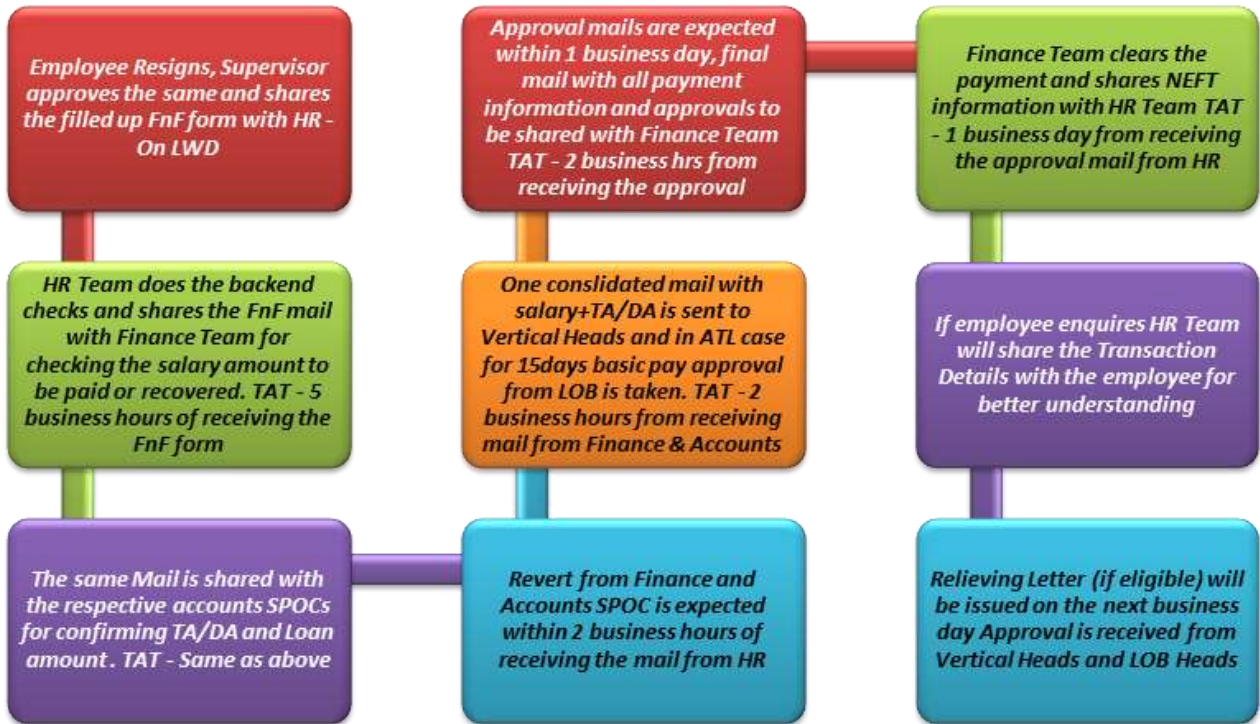
Full and Final Settlement:

- *The employee who resigns or gets terminated needs to fill up the form of F & F on the last working day.*
- *HR is required to share the same with the FnF details mentioned in a mail to the LOB Head for approval.*
- *Post approval the same is shared with Accounts team for release. From the time HR receives approval and the intimation is shared with Accounts team, the time should not exceed 48hrs (excepting Holidays and Offs).*
- *Employee is required to submit his/her id card or any other office items in position before filling up FnF. If the same is not shared then deduction of money to be done from FnF.*
- *For Golden Attendance members, no PL encashment will be done during FnF.*

Payment or Compensation Policy for Retrenchment : (effective May 2023)

The company can involuntarily discontinue any employee's service by providing 15 days of notice or 15days salary in lieu of it, if the concerned is less than an year old in the system. If the employee is atleast an year old in the system, then company shall issue 30days notice or 30days salary, provided the reason for separation is not due to Disciplinary Issues or repeated incorrigible non-performance or Anti-National/Criminal activities.

FnF Process Flow : Effective 1st Mar 2019



Rehiring process effective from 15-Mar-19 : Employees who have left the organization and are willing to re-join, can only be considered for re-hiring, if they have completed min 2yrs from the Last Working Date of the previous stint at Orion. Exception if any to be approved by Founder Directors only. However, employee eligible for rehire must follow the following criteria : FnF status of previous stint should be closed, if there are any pendencies from the previous FnF then the same needs to be cleared before re-joining, Absconding employees are not eligible for re-hire, employees Terminated or Asked to Leave due to disciplinary issues or performance related issues or POSH will not be considered eligible for re-hire. With effect from 1st April 2023, any rejoining at any capacity of/above Assistant Manager needs approval of either of the Founder Directors.

Salary Help Desk :

With the vision to handle salary issues efficiently, HR is pleased to introduce, Salary Help Desk concept from March 2018. From this month all Salary Related issues are require to be reported from 5th till 8th of the month at Salary.Helpdesk@Orionedutech.com e-mail id. This id will be operational from 5th till 8th EOD every month, that means no one can either mail in or mail out from this id post 8th or before 5th of the month . Following is the process.

- 1) Mostly Salary Slips and Salary gets disbursed by 5th of every month. Employee is required to check the salary and get back to HR incase of any discrepancy at the above mentioned id within the specified timeline.
- 2) No individual mails to be shared to any HR id as HR will not be able to track and respond to these cases.
- 3) Any new issue getting shared after 8th will not be considered.
- 4) In case if any issue which got reported within the specified timeline in the specified e-mail address, is not resolved within 8th then, HR will continue to resolve the same and updates will be shared from individual ids, but no new issues can be reported in response to the resolution to individual HR id.

General

Employment Confirmation: (Effective 1st April 2023)

When an employee joins Orion Edutech Pvt Ltd or its associates, he/she is eligible for 3 months of probation irrespective of designation and demography and this is subject to performance within these 3 months.

- 1) *Employment Confirmation cycle will be 1st to 31st of the month.*
- 2) *Post completion of 3 months HR will share the list with the respective LOB Heads for confirmation.*
- 3) *Respective LOB Heads will consult the employee's immediate supervisor and basis performance the employee will be confirmed.*
- 4) *Supervisor may decide to Hold confirmation twice i.e. for 30days twice maximum. On the 3rd instance the employee either needs to be confirmed or Asked to Leave. HR will share mails with the employees on their Official/Personal e-mail ids marking the concerned LOB Head, and reporting supervisor by the last day of the said month.*

Code of Ethics:**Sexual Harassment**

We, at Orion Edutech, are committed to promoting a working environment that emphasizes equality of opportunity and freedom from fear of harassment for all its members, and are particularly keen on empowering our women colleagues to create an atmosphere where all can work with dignity. It ensures that we have a workplace free of sexual harassment.

Objective

Our policy on gender equality strictly prohibits all members from engaging in unwelcome sexual conduct or sexual overtures - visual, verbal, or physical. All our employees must refrain from being indulged in such offense towards members, customers, vendors or anyone else.

In Scope

The policy covers all regular employees, probationers, contract employees and all staff of Orion Edutech.

Detailed process when a complaint is received

When a complaint is received, the following steps are followed:

- **Step 1:** Complaint is reported to the LOB Head
- **Step 2:** LOB Head obtains and records full, step-by-step account of the incident/s
- **Step 3:** Ascertain the complainant's preferred outcome, e.g. an apology, the behavior to cease, a change in working arrangements
- **Step 4:** Agrees on the next step: informal resolution or formal investigation
- **Step 5:** Keeps a confidential record of all details of this discussion and subsequent steps in the process.
- **Step 6:** Presents the detailed report to the sexual harassment committee
- **Step 7:** The committee analyses the facts and takes appropriate actions based on the evidence, i.e. informal resolution or formal investigation

The Prevention of Sexual Harassment Committee (POSH) consists of the following members:

- Mrs. Mehak Saraf - Presiding Officer
- Mr. Subhradip Purkayastha (Advocate) - Member
- Mr. Sanjeev Kothari - Member from NGO
- Mrs. Puja Banerjee - Member
- Mr. Arijit Majumder - Member

Resolution Process (Process flow)

Based on the intensity of the act, Resolution process may be determined

- *Informal Resolution*
- *Formal Resolution*

Informal Resolution

Where a complainant has chosen informal resolution, following are the steps that the reporting authority abides by:

- *Informs the alleged harasser of the complaint and provide an opportunity to respond*
- *Ensures both parties understand their rights and responsibilities under the organization's policy*
- *If possible, mediates an outcome that is satisfactory for the complainant*
- *Ensures that confidentiality is maintained*
- *Follows up to ensure the behavior does not re-occur.*

Formal Resolution

If a formal investigation is requested by the complainant, or if an informal resolution fails, the sexually harassed victim escalates the matter to the Director of the organization, the processes are:

- *Interviews all directly concerned, separately*
- *Interview witnesses, separately*
- *Keeps records of the interviews and investigation*
- *Ensures confidentiality*
- *In such a case, determines appropriate action, which may include a change of duties for the harasser, change to working arrangements or, where the incidents were frequent and/or severe, dismissal*
- *Checks to ensure the action meets the needs of the complainant and the organization.*

Grievance Redressal Policy:**Objective**

The primary objective of grievance redressal policy is to ensure healthy employer - employee relationship. This would ensure improved productivity and efficiency in the organization and also result in strengthening team spirit among all members to perform and achieve the goal of the organization

Applicability

The policy covers all regular employees, probationers, contract employees and all staff of Orion Edutech

Grievance Redressal Procedure**(Process Flow)**

Step 1: Aggrieved employee submits grievance to reporting head

Step 2: Reporting head to resolve the issue in two working days

Step 3: If not solved by reporting manager, forwarded to location HR who should resolve the issue within 3 working days from receipt of the grievance

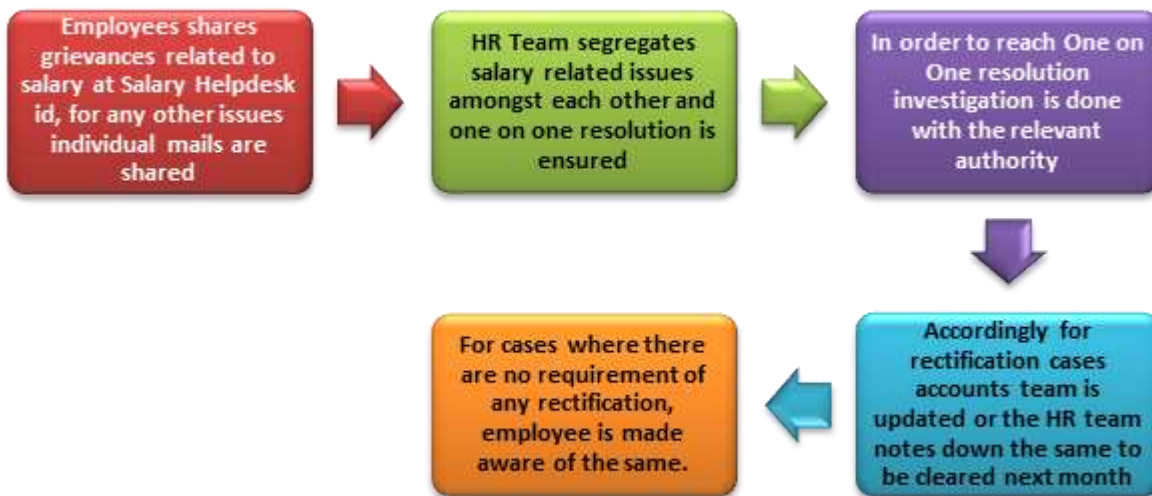
Step 4: If location HR cannot resolve then forwarded to Director HR & Operations

Step 5: If the aggrieved employee is not satisfied, he/she can appeal to the director. The decision of the Director is final

General

An aggrieved employee submits his/her grievance to his immediate reporting head. The reporting head resolves it within 2 working days of receipt of the grievance and reverts to the employee. In case it is not solved, it is forwarded to the respective location HR who tries to redress the grievance at his/her level within 3 working days from receipt of the grievance. In case the grievance is not resolved, HR forwards it to Director-HR & Operations who accordingly gives his recommendation and comments within three days. If the employee is not satisfied with the decision he/ she has the option for an appeal to the Director. The decision of the Director is the final.

Process TAT : Max 5 business days from receiving the Issue/Grievance.



Drugs and Alcohol:

Orion Edutech Private Limited strictly prohibits the use of drugs and/or alcohol in the workplace and in the official accommodation provided. All our members and employers must be in a clear and conscious state of mind during work hours.

Privacy of Records:

We provide utmost importance to the maintenance of privacy of personal information of every employee of Orion. We have well defined policies that protect such information from other employees and members. Nobody is allowed to access our employee database without prior permission from the authorities.

Confidentiality:

Our employees are required to maintain the confidentiality of any information and processes of the organization. They must not reveal any piece of information about their organization to any external party without permission from the management. Violation of confidentiality of the organization is subject to taking strict action against the employee and that can be termination also.

Note: Strict offence as sexual harassment, illegal measures taken, theft, physical violence, tampering organizational confidentiality and so on are liable for stringent action against the individual and also termination of the individual depending upon the level of offence.

Do's:

- Be punctual.

General

HUMAN RESOURCE MANUAL

- Put biometric (Onsite Employee) and ERP attendance (Those who are travelling) without deviation.
- Dangle employee Identity card during working hours/ in the work premises.
- Switch off your computer before you leave for the day.
- Basic cleanliness of your workstation.
- Wear decent clothes as per Dress Code Policy.
- Be clean shaven for Male.
- Care for the company's assets.

Don'ts:

- Do not use abusive language in the office premises.
- Do not eat non-veg in the office premises & do not roam about in the office premises.
- Do not indulge in physical harassment of any employee.
- Do not indulge in violence or theft.
- Do not smoke in the office premises.

What's App:

A group "Team Orion" is created in what'sapp, where every member on approval of the Reporting Boss can add Him/Her. Only official sms will be accepted during office hours (9 a.m.-7 p.m.), else for any non-official sms (such as – Birthday, Anniversary Wishes) should be shared before 9 a.m./after 7 p.m.

Violating the rules will lead to Penalty.

Note: All clauses are subject to amendments and alterations with the discretion of the directors.

Shift Timings:

Following are the usual shifts that the company follows however, depending on the need of the employee, there are certain exceptions as well.

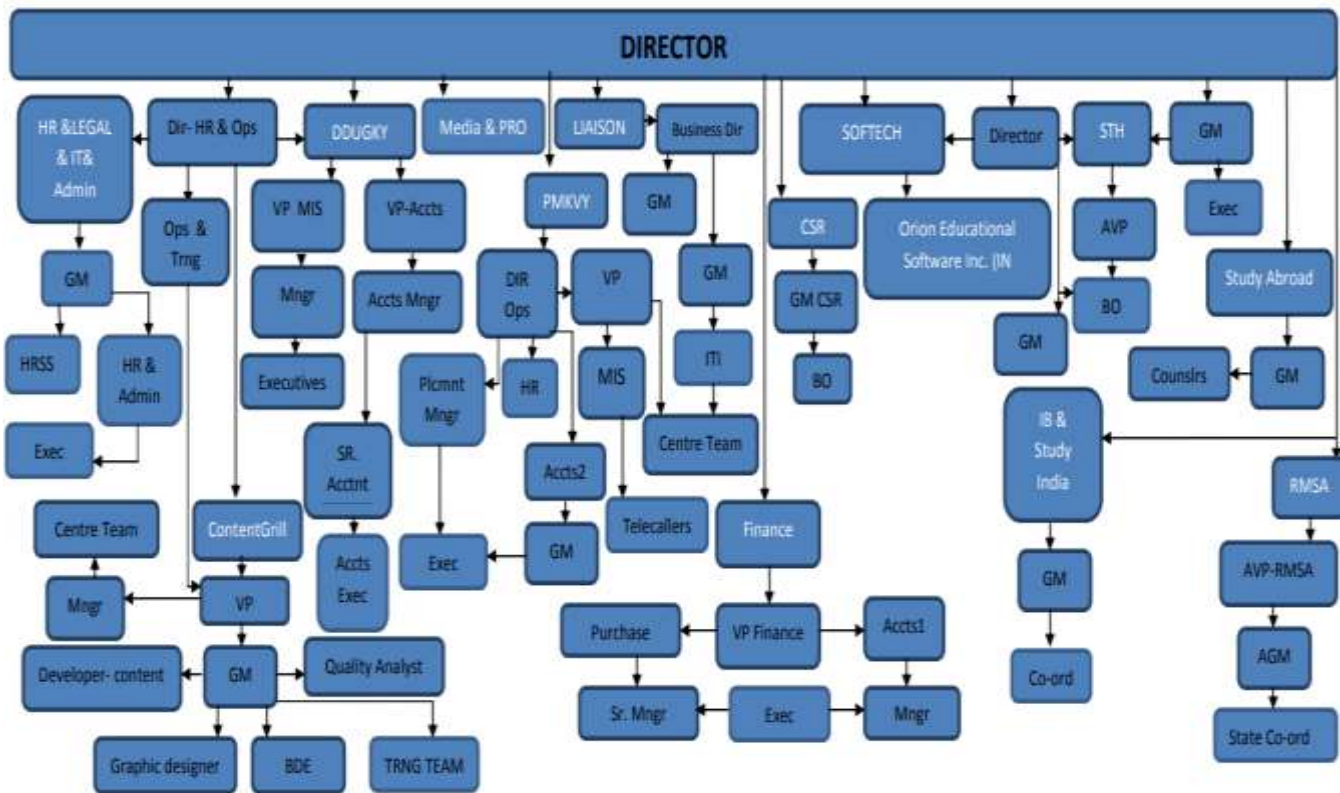
- 1) 9:00am to 5:00pm/6:00pm
- 2) 9:30am to 5:30pm/6:30pm
- 3) 10:00am to 6:00pm/7:00pm
- 4) 10:30am to 6:30pm/7:30pm

Please note all employees who are based out of Head Office and Regional Office follows 8hrs shift with no Grace Period for login and enjoys 2nd and 4th Saturdays as Week Off along with all Sundays. Also from 1st Jan 2021 all working Saturdays for HO/RO bound employees will be Work from Home with 100% salary. These employees are required to mark ERP attendance on the WFH days.

Rest of the employees are required to do a 9hrs shift with 15mins grace during both login and logout. They are entitled for only 1 Week Off in the week which is LOB specific.

This is effective from 26th January 2019.

1. ORGANISATIONAL MATRIX



Appendix – 1

Employee Referral Policy :

Sl #	Parameters	Policy
1	Definition	When existing employees source candidates from their known or relations for a said profile, it is called Employee Referral (ER).
2	Payout	Payout depends on the approval received from the Director HR and the Founder Directors for a said period.
3	Payout	ER payout amount is Rs1000 per candidate. The referee is required to be active for min 60days. Payout will be done post completion of 60days.
4	Policy	ER Payout cycle is 21st of the previous month to 20th of the current month. All referrals completing 60days within this time period will be eligible for payout that month.
5	Eligibility	The referred employee should not be a Direct Reportee or a Line or an Upline supervisor of the referee.
6	Eligibility	Referred candidate should join with or after the referred employee.
7	Eligibility	Referee has to mail the candidature before the employee gets selected in any of the selection rounds.
8	Eligibility	Both employees (referee & referral) should be active during payout.
9	Eligibility	HR and TA employees are barred from this policy.
10	Ownership	The employee referral is an ownership of the Talent Acquisition team. Maintaining the database, ensuring timely payout and sending the data to Accounts teams for payout will be ensured by the TA team.

Payout Process :

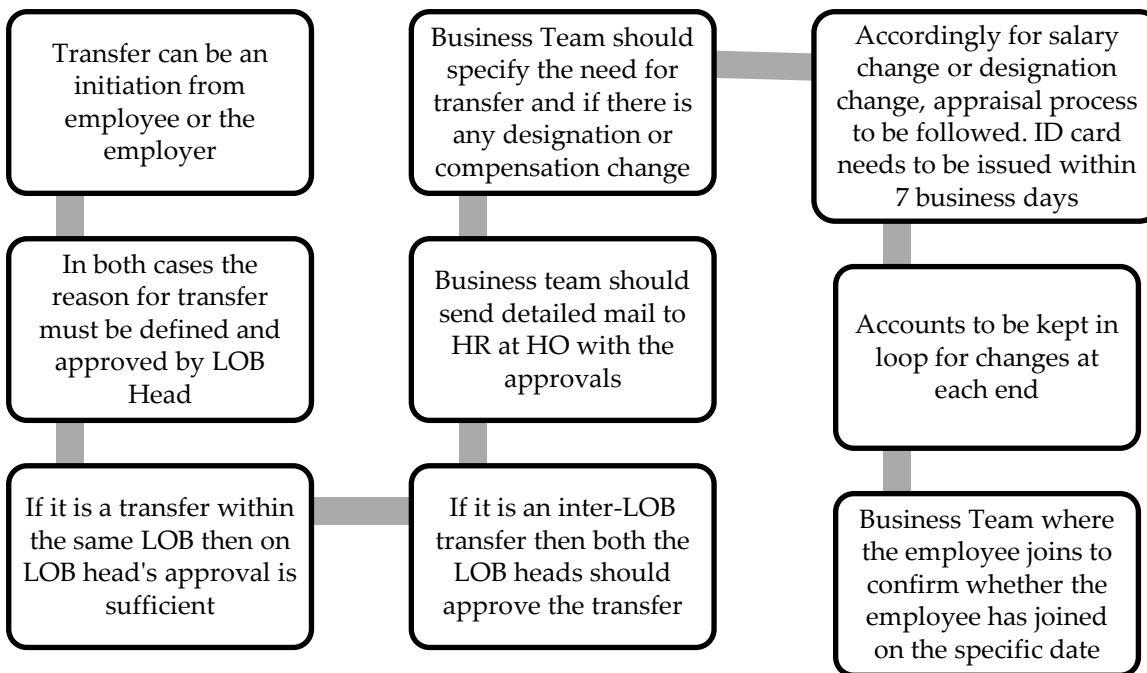
Talent Acquisition team is responsible to prepare the payout database and ensure timely payout with help of accounts team.

Appendix - 2

Transfer or Redeployment Policy

Process : TAT 1 business day (from receiving requisition mail from business team to HR sharing the transfer mail).

Internal Transfer Policy (within same company):



Company to Company Redeployment Policy :

Effective 1st Nov 2022, any Transfer in or Transfer Out from Orion Educational Society, employee needs to resign and then rejoin the new company. FnF process will be followed and Tenurity will not be continued. For any Transfer In or Transfer Out from OEPL, OCA, Softech & Contentgrill and Sashi to any of the companies except Society, employee will resign and join the new company, however, Tenurity will be continued and FnF process will not be applicable.

Appendix – 3

Disciplinary Action Grid :

This is a corrective measure where the employee is expected to be compliant to the Business Conduct Guidelines (BCG). HR is the only authorized party to determine and executive the relevant course of action.

HUMAN RESOURCE MANUAL

Business team is supposed to raise an Incident Report or Business case detailing the incident to HR with prior approval from LOB Head.

HR will suggest course of action as per the DAP grid mentioned below, Director HR is authorized to sanction or change the action by considering an exception depending on nature of business and business requirement.

The data will be maintained by HR for future communication.

Sl	Severity	Instances	Action	Eligibility	Severity & Implication
1	Critical to Quality	Using Profanity or Uncouth (Slang or foul language) in workplace through verbal or written means -	1st Instance - Verbal Documented Warning Letter	Any Tenure	is a documented warning
			2nd Instance - Level 1	Any Tenure	6 months validity, no promotion & no increment
			3rd Instance - Level 2	Any Tenure	1yr validity, no promotion & no increment
			4th Instance - Level 3	Any Tenure	Termination
2		Wrong Attendance Marking (Marking Attendance from Home or any other place away from work location, exception during planned official travel)	1st Instance - Level 1 & Double Pay deduction	Any Tenure	6 months validity, no promotion & no increment
			2nd Instance - Level 2 & 4days Pay deduction	Any Tenure	1yr validity, no promotion & no increment
			3rd Instance - Level 3	Any Tenure	Termination
3		Belittling & Harrassment	1st Instance - Verbal Documented Warning Letter	Any Tenure	is a documented warning
			2nd Instance - Level 1	Any Tenure	6 months validity, no promotion & no increment
			3rd Instance - Level 2	Any Tenure	1yr validity, no promotion & no increment
	4th Instance - Level 3		Any Tenure	Termination	
4	Critical to Business	Theft or bribe	1st Instance - Level 3 & FIR to be lodged if the value is more than 20K	Any Tenure	Termination
5		Anti Management Propaganda in employees	1st Instance - Level 1	Any Tenure	6 months validity, no promotion & no increment
			2nd Instance - Level 2	Any Tenure	1yr validity, no promotion & no increment
			3rd Instance - Level 3	Any Tenure	Termination
6	Not following any Client Mandate	1st Instance - Level 1	Any Tenure	6 months validity, no promotion & no increment	
		2nd Instance - Level 2	Any Tenure	1yr validity, no promotion & no increment	
		3rd Instance - Level 3	Any Tenure	Termination	
7	Anti Management Propaganda to clients	1st Instance - Level 3	Any Tenure	Termination	
8	Critical to Business	Not following any HR Policy	1st Instance - Verbal Documented Warning Letter	Any Tenure	is a documented warning
			1st Instance - Level 1	Any Tenure	6 months validity, no promotion & no increment
			2nd Instance - Level 2	Any Tenure	1yr validity, no promotion & no increment
			3rd Instance - Level 3	Any Tenure	Termination
9	Dual Employment	1st Instance - Level 3 & Salary for the number of the days worked to be recovered from the employee.	Any Tenure	Termination	
10	Damaging Office Property	1st Instance - Level 3 & FIR to be lodged if the value is more than 20K	Any Tenure	Termination	

Process TAT – *If the candidate is in Kolkata then the case is closed within 2 business days. If the candidate is based out of Kolkata then the case is closed in 3 business days. For Termination/ATL/POSH cases the same is closed within 7 business days.*



Appendix – 4

Travel Policy

Travel Policy Eligibility:

Domestic Travel Policy						
Sl. No.	Level	Mode	D.A. (Including Fooding)	Hotel Tariff	Transport Mode	Mobile Limits
1	G - Global	Both Side Airfare (If Journey is more than 12hrs) or else 3 tire AC (See Point # 9)	600	Max 1600	Taxi/Auto	200
2	Z - Zonal	Both Side Airfare (If Journey is more than 18hrs) or else 3 tire AC (See Point # 10)	500	Max 1400	Auto/Bus/Train/Taxi	200
3	R - Regional	Both Side 3Tier AC or one sided Airfare (See Point # 11)	400	Max 1000	Sharing Auto/Bus/Train/Shared App Cabs	200
4	A - Area	Sleeper Class	300	Max 900	Sharing Auto/Bus/Train/Shared App Cabs	200
5	L - Local	Sleeper Class	300	Max 800	Sharing Auto/Bus/Train	200

Legends :

G stands for Global Roles i.e. AVP and above.

Z stands for Zonal Roles i.e. Zonal Managers, AGM and GM.

R stands for Regional Roles i.e. Sr. Managers and Regional Managers.

A stands for Area Roles i.e. Managers, Assistant Managers and Team Leaders.

L Stands for Local Roles i.e. Executives and Mobilizers.

Policy Clarification :

- 1 Leave during tour is not permissible.
- 2 All tours must be approved from reporting authority prior to travel.
- 3 The amounts given above are guidelines and not an entitlement.
- 4 DA is not available if returning to base place on the same day.
- 5 Payments for tour expenses including Hotel will be settled directly by the employee.
- 6 Bills need to be provided. Where bill is not available, self-declaration need to be submitted.
- 7 In case any expenses is sponsored by the vendors/Business Partner shall not be allowed as claim.
- 8 Outstation Travel Expenses Statement must be submitted to the reporting authority for approval, immediately upon return from tour, If the TA bill is not submitted within 15 days of returning from Journey then company will not be liable to reimburse the same and the T.A. advance taken would be deducted from the salary.
- 9 Both Air fare is available if the journey is more than 12 hours by train and fare should be within permissible limit.
- 10 Both Air fare is available if the journey is more than 18 hours by train and fare should be within permissible limit. For Female employees, the same is applicable if the journey is more than 16 hours by train and the cost of flight is within 9000INR for both side (to and fro).
- 11 3T AC - one sided Air Fare within permissible limit (no sleeper class).
- 12 Travelling with bike will be reimbursed @ Rs. 2.70 per Kilometer and for AGM and above Self owned car travelling will be reimbursed @Rs7.80 per Kilometer.
- ** Mobile limit is guidelines not an entitlement, the supporting must be given at the time of claim.
- 13 Under A & L category if any female employee is required to travel for more than 12hrs or there is an overnight travel then 3 Tier AC Rail Ticket can be sanctioned by the LOB Head.

Appendix – 5

Leave counts & Logics for application – (Effective 1st Oct 2019)

New Leave Policy				
Sl #	Leaves	Orion Leave Count	Calculated Basis	Remarks
1	Priviledge Leave	14	Calendar Year	Eligibility : All payroll employees who have completed 1yr of continuous service. Accumulation : Total 24 leaves can be accumulated in 2yrs, beyond 24 all extra leaves will expire on 31st Dec. Encashment : PLs can only be encashed during FnF or can be adjusted from Notice Period. Clubbing : Can be clubbed with CL and Comp Offs but cannot preceed SL but can succeed SL.
2	Casual Leave	10	Calendar Year	Eligibility : All payroll employees are eligible from Day 1 of service Accumulation : Leaves will expire on 31st Dec if not availed. Encashment : Cannot be adjusted from Notice Period or Encashed. Clubbing : Can be clubbed wiith PL but not SL or Comp Off.
3	Sick Leave	7	Calendar Year	Eligibility : All payroll employees are eligible from Day 1 of service, needs to show valid medical documents if the leave exceeds 2 continuous days. Accumulation : Leaves will expire on 31st Dec if not availed. Encashment : Cannot be adjusted from Notice Period or Encashed. Clubbing : SL cannot preceed CL or Comp Off and cannot succeed a PL or CL or Comp Off.
4	Holidays	14	Calendar Year	Depends on State of Operation
5	Maternity Leave	180	Situational	Max 8 weeks of Pre-Natal and 18 weeks of Post Natal
6	Breavement Leave	13	Situational	Only during the death of Biological Parents
7	Marriage Leave	7	Situational	Allowed for Self Marriage 1st marriage only
8	Paternity Leave	1	Situational	Allowed upto 2 kids only
9	Emergency Leave	15	Situational	In the event of any accident at work place during office hours or extended work premises (eg guest house etc) or during any travel due to official work or during coming to office or returning from office

Deviations :

- 1) Account's Team will be the sole custodian of the Leave Balances until it is clubbed in the New ERP system.
- 2) On account of more than 2days of late each day will be considered as a full day leave and deduction will happen first from Casual Leave and then from Privilege Leave.
- 3) Employees are eligible for CL and SL from the day 1 of employment however, PL eligibility starts after completion of 1yr.
- 4) During the event when an employee takes leave without informing the supervisor or when the supervisor has rejected the leave but the employee still goes ahead with the leave, then he will be marked absent for that day and also 2days payout will be deducted.

Maternity Leave :

Effective 1st April 2018, Maternity leave is provided basis Maternity Act 1961 and Amendment of Maternity Act 2017. Total 26 weeks of leave is provided as per the policy to an expecting employee. As per policy she is eligible for maximum 8 weeks of Pre-natal leave and rest 18 weeks of Post-natal leave.

The concerned supervisor is required to take the Expected Date of Delivery (EDD) as mentioned by the doctor in the prescription. Employee can avail Pre-natal leave of max 8 weeks before the EDD and then the rest 18 weeks post delivery.

Scenario #1:

Employee submits EDD and goes for Pre-natal leave i.e. 8 weeks before EDD however, delivery happens before EDD, then supervisor is required to calculate the leave taken till delivery if the same is less than 8 weeks then the balance days to be added to the Post-Natal leave count.

Scenario #2:

Employee submits EDD and goes for Pre-natal leave i.e. 8 weeks before EDD however, delivery happens after EDD, then supervisor is required to calculate 8 weeks from the date of delivery and the extra leave days to be substituted from the available leave balance or to be considered as LWP. While Post-Natal phase remains unchanged.

Scenario #3 :

Employee during the phase of pregnancy, is advised by the doctor to take leave from work or she herself is not well to attend office and requests for Maternity Leave. This is not possible. Instead in the above scenario the management will provide Leave to be employee from the leave balance acquired by the employee and the rest will be considered as LWP.

Scenario #4 :

Employee wants to bifurcate the Pre-natal leave of 8 weeks into installments, however, the same is not allowed. Maternity Leave cannot be interrupted in between at any cost.

Employee would need to submit documents pertaining to the leave, to the immediate supervisor and the supervisor is required to share mail with HR requesting for the Maternity Leave. When the employee actually goes on leave then the supervisor needs to take approval of the LOB Head and share the actual leave start date with HR. Even post child birth the supervisor need to intimate HR the actual delivery date so that the post natal leave calculations can be done. Employee will be eligible for full salary during the Maternity Leave period (effective from 1st Sep 2019). Increment and Promotion eligibility will remain as is. From the announcement of pregnancy i.e. employee declaring herself as pregnant by providing medical proof, the management would not allow her to get involved in “hazardous job” i.e. job which involves extensive travelling, or physical labor or use of reagents that are detrimental to the health.

The above mentioned leave is applicable for Adoption (below 3 months) and Surrogacy (when the baby is handed over) as well however, only 12 weeks is provided and not 26 weeks. For Miscarriage or Medical Termination of Pregnancy the employee is eligible for 6 weeks of Maternity Leave. During Tubectomy operation the employee is eligible for 2 weeks of Maternity Leave.

Maternity Leave is eligible for min 2 live births or 2 live children only, beyond this 12weeks Maternity Leave is applicable with max 42days prenatal and 42days post natal leave.

Paternity Leave :

The employee is eligible for 1 day Paternity Leave till 2 live births or 2 live children only. The leave can be availed within the first 15 days on child birth. Employee will be eligible for full day's payment. Supervisor is required to check the documents before sanctioning the same and should intimate HR accordingly. HR will inform Accounts accordingly during the concerned month's payroll.

Note : In case if employee doesn't complete one calendar year tenure i.e. 1st January to 31st December in the company and decides to leave the company or the company decides to part away with the employee involuntarily, then employee is not eligible for full CL/SL/PL. Eligibility of all the above will be calculated on prorate basis (till the month employee has worked) and if any extra leaves have been availed by the company then the same will be deducted from FrF.

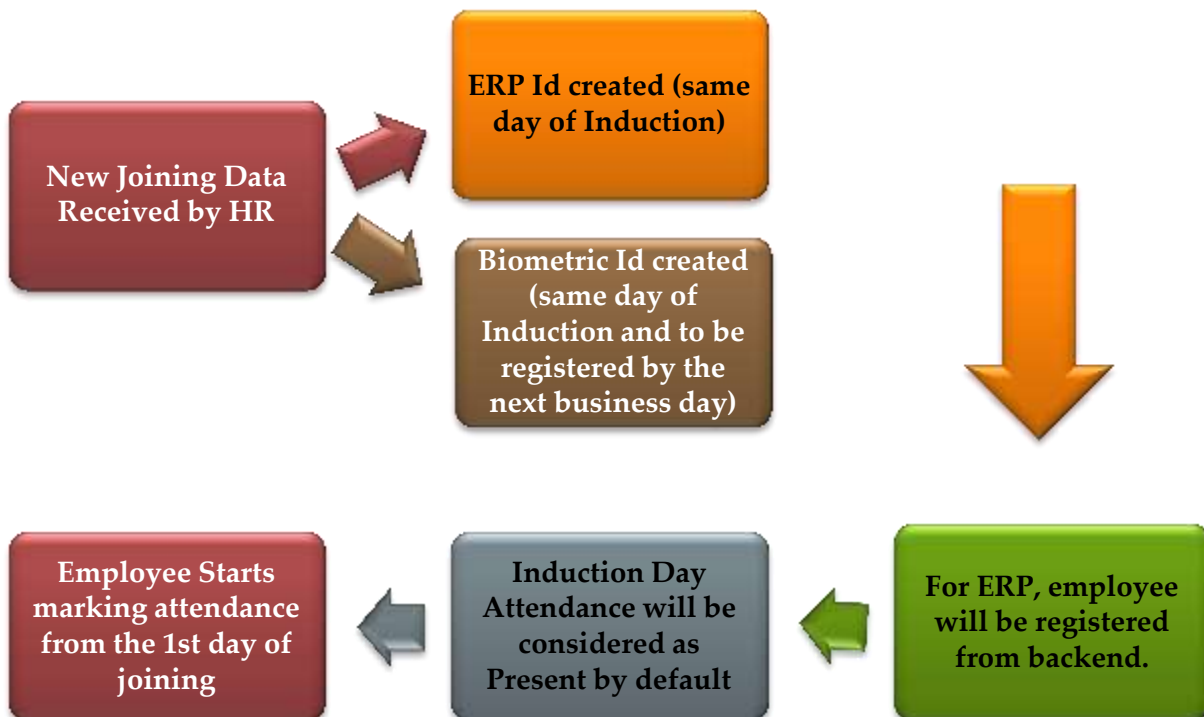
If employee joins after 1st of Jan then leave eligibility will be on prorate basis. Same if one year completion of the employee happens after 1st Jan then PL eligibility will also be ensured on prorate basis.

Appendix – 6

A) Modes of Attendance Updation :

- 1) Enterprise Resource Planning – ERP
- 2) Biometric

Process Flow :



Attendance Marking Logic :

Login for less than 4hrs on a given day will be Treated as Absent.

Login for 4 to 6hrs on a given day will be Treated as Half Day.

Login for more than 6hrs on a given day will be Treated as Full Day.

If login was done but not logged out or vice versa then employee will be marked Absent.

Every 3rd instance of late coming/early leaving will be marked as Absent hence, will be treated as LWP or deduction of leave from leave bucket.

Every 2nd & 4th Saturday will be treated as Off for HO and RO employees. Rest all Saturdays will be WFH. On these days attendance at 9am is mandatory on ERP, any login after 9:00:59am will be considered as late and any logged out before 5pm will be considered as Early leaving.

General

1) Enterprise Resource Planning :-

Sl #	Parameter	Process	TAT
1	Registration	a) Talent Acquisition team is required to share the new joining data with HR prior to the employee's joining date and HR ERP Admin personnel in turn will create the ERP registration for the employee	Before DOJ
2		b) HR will share a mail with the employee along with the links and the usability of the tool.	On DOJ
3		b) Employee's supervisor needs to be registered first so the employee can be tagged.	Before Employee Joins organization
4	Recording Attendance	a) Employee is supposed to login using his employee id as his username and password everyday except for Public Holidays, Leaves and Week Off days.	Every Working Day
5		b) The employee needs to login his/her attendance and logout to ensure the attendance is recorded. If either login or logout is missing then the same is a non-compliance and will be have an implication in the payroll.	Every Working Day
6		c) Employee has the privilege to view his/her recorded attendance for a selected time period.	-

2) Biometric Attendance :-

Sl #	Parameter	Process	TAT
1	Registration	a) Talent Acquisition is required to share the joining data with HR team and HR Biometric Admin personnel is required to create Biometric id at the backend.	Before Joining
2		b) Biometric id needs to be shared with IT team in order to make the employee physically register his/her finger impression in the device.	On the Joining Date
3		c) As a process employee would need to register several fingers to ensure there are buffers available in case if the registered finger is injured or is not in a position to record attendance.	On the Joining Date
5	Recording Attendance	a) Employee is required to record his/her attendance before they enter the office premises or production unit of the company.	Every Working Day
6		b) Employee would carry out the similar activity post shift and when ready to leave office to record full day's attendance.	Every Working Day

B) Exceptions and Implications :

Sl #	Exception Parameter	Exception
1	Adherence to login as per the specified shift.	15mins is considered as a buffer time to record attendance without any impact on attendance only for Centre Employees.

2	Adherence to logout as per the specified shift.	15mins is considered as a buffer time to record attendance without any impact on attendance only for Centre Employees.
3	Employee Forgetting to either Login or Logout	a) There are no exceptions in this case available, employee will have to be responsible for marking his attendance irrespective of ERP or biometric. b) HR Team will process salary the way it is reflecting in the portal dump reports.
4	Employee neither logged in nor logged out (technical reasons, travelling, personal reasons etc)	a) In no situation effective May 2018, employee can have any blank attendance. In case of no network situation employee has to request his supervisor to login or logout on his behalf. b) For Biometric users only if they are sent outside office for some official work then only LOB Head can approve exception and HR will consider for payroll.
5	Attendance before ERP/Biometric id got created however, employee has joined.	a) ERP id needs to be created before the employee joins the organization hence, no question of any delayed attendance. b) Biometric Id needs to be configured by IT team on the same day of employee's joining thus, the delay will be adjusted for the 1st day only.
6	Extra Working Day Attendance Marking.	a) For both ERP and Biometric users extra working needs to be approved by the reporting supervisor before the day extra working was done and to be shared with HR. b) Such mails must reach HR latest by the date specified by HR before payroll. (Please refer to Annexure – 9)

C) Payroll Period :

- 1) Payroll period is from 27th of the last month to the 26th of the current month, however, the payout is based on 1st to 31st of the month.
- 2) HR will be responsible to prepare and share attendance with Accounts team by the last day of the month.
- 3) Salary will be credited on the 5th day of the month. If 5th is a Holiday then as per decision of the management either the payout can happen before or after the said date.

Shift Change Policy :

- 1) *Any shift change request should have an approval from LOB Head with a justification for change. Such request mails need to be sent to HR by the 3rd of the current month to incorporate in the same month or else the same will be effective from next month.*

Appendix – 7

Work From Home Policy

Eligibility:

This is for all payroll confirmed employees only, where employee stays at home and works for the company. Effective from 1st Jan 2021, the only exception conceived for HO/RO bound employees on every working Saturdays WFH is mandatory with 100% salary and all eligible employees are required to mark ERP attendance.

Note:

1. *All confirmed employees in Payroll are considered in scope of this policy.*
2. *Applicable for a condition where the employee is medically unfit to attend office supported by a document from a recognized medical practitioner. This cannot exceed 30days.*
3. *In a situation when there is a sad demise of a family member like Biological parents, spouse, siblings, children and own grand-parents. Post joining they will have to provide Death Certificate of the concerned family member so to rightfully substantiate the authenticity of the claim. This cannot exceed 15days.*
4. *In a situation when there is an bed-bound illness of Biological parents, spouse, siblings, children and own grand-parents. Post joining they need to produce a medical document from a recognized medical practitioner substantiating the authenticity of the claim. This cannot exceed 15days.*
5. *In a situation when spouse is on an official trip and there are sick parents at home or kids below the age of 10yrs to be taken care of. In this situation the employee post joining needs to submit to and fro travel tickets of the spouse along with medical documents of ailing parents from a recognized medical practitioner or the birth certificate of the kids. This cannot exceed 30days.*
6. *In a situation where the spouse has been transferred to an outstation location and the employee is required to accompany him/her to that location for a period not exceeding 30days. In this situation the employee needs to provide the spouse's transfer intimation from his/her office.*
7. *In a situation where the kids are facing board exams. The employee is required to submit the Admit Card of the kid appearing from the board exam. This can be availed max for 15days and no extensions are allowed.*

In no other circumstances this policy to be used.

Implication :

Default payment during WFH is 75% of the total monthly salary unless other-wise approved by the LOB Head.

Application Process :

General

Concerned employee along with the mentioned documents stated above needs get approval from the concerned LOB Head, in case of LOB Heads, the approval needs to be procured from the respective Founder Directors. Once approvals are received, the request needs to be shared with HR for payroll purpose. In case if there is an extension required again the employee needs to procure approval of LOB Head and share the approval with HR. But extensions cannot exceed 60days in any situation.

Appendix – 8

Dress Code Policy

Men :

Monday to Thursday – Western Formal Attire (Corporate Alliance would need to wear Tie as well)

Every Friday – Business Casuals (Does not include Round neck and V-neck T-shirts and Torn Jeans) excluding Centre Employees.

Every Saturday - Business Casuals (Does not include Round neck T-shirts and Torn Jeans) for Centre Employees only.

Women :

Monday to Thursday – Indian or Western Formal Attire

Every Friday – Business Casuals (Does not include Round neck T-shirts, Cold Shoulders, Off Shoulders, Capri and Torn Jeans) excluding Centre Employees.

Every Saturday - Business Casuals (Does not include Round neck T-shirts, Cold Shoulders, Off Shoulders, Capri and Torn Jeans) for Centre Employees only.

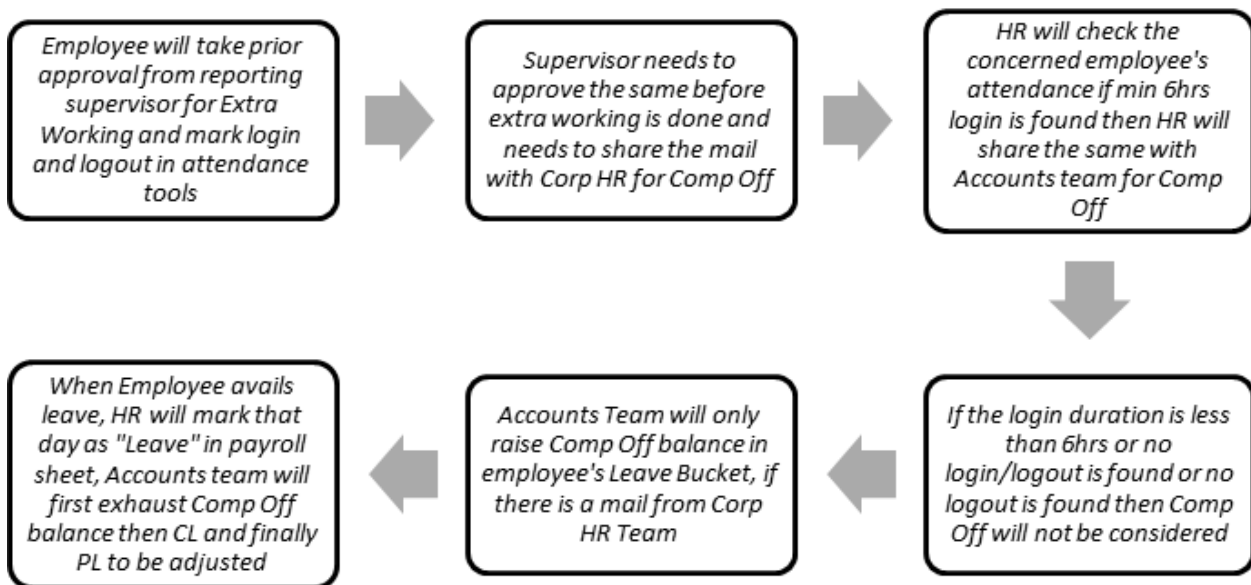
Grooming Standards:

- 1) *Clean Shave for Men.*
- 2) *Ankle Length Trousers/Salwars/Jeans/Skirts (as applicable)*
- 3) *Closed Footware for Men on all days.*
- 4) *Light Make-up for women.*
- 5) *Clean and Ironed clothes.*
- 6) *Usage of Perfumes, deodorants etc for personal hygiene.*
- 7) *Piercings – Only Ear allowed for Men and Women, Nose allowed only for Women, else visibly nowhere piercings are allowed.*
- 8) *Hair Cut and Color – Classic Professional for all.*

Appendix – 9

Extra Working or Holiday Working Policy

Any Employee working on a Weekly Off or Declared Holiday due to the business need is eligible for a Complementary Off which needs to be exhausted within the Quarter. For an example if it is the July, August & September (JAS) Quarter then the Comp Off eligibility starts from 27th of June to 26th of September i.e. if any employee does an extra working within this period then he/she would need to avail the off by 26th of September and not 30th September. **Process :** As per Extra Working Policy, employees need to stay logged in for min 6hrs to be eligible to claim a Comp Off. This is effective 18th March 2019.



Appendix – 10

Retirement Policy and Benefits

The retirement age at Orion Edutech Pvt Ltd is 60yrs (effective 1st Jan 2021) and any employee working in payroll of the company upon attaining the age of 60yrs would be automatically retiring from the company. Following are the provisions under this policy :

- 1) *Upon attaining the age of 60yrs the employee in payroll will be retired from the services of the company, HR will only consider date of birth mentioned in Adhar Card, Voter Id Card, Pan Card, Driving License and Passport. No other documents will be considered valid.*
- 2) *Employee retiring from the job will be eligible for the working day's salary of the current month, Gratuity if the period of work in the company is more than equal to 4yrs and 240days and money for Earn Leave Balance only. In this case Gratuity to be paid is for 5yrs. Few Examples : If the period of work is 5yrs & 6 months then payment for 6yrs to be ensured however, if the same is less than 6months then 5yrs payment to be ensured. In case of death or superannuation, employee is eligible for Gratuity till the period worked and to be paid in FnF. In these cases, 4yrs and 240days rule will not be applicable.*
- 3) *HR Compliance team will process Provident Fund and Pension Fund claims, by sharing Form 19, Form 10C and Form 10D with the employee and upon receiving the filled up forms from the employee.*
- 4) *In the event of the employee's death during the process of claims, the nominee will be eligible for the pension. Following kiths and kins are eligible for pension in this situation : Widow/Widower, son below the age of 18yrs and unmarried/divorced/widow dependent daughter.*
- 5) *If the management wants, the retired employee can be hired as a Service Provider under Service Agreement and will be eligible for 10% TDS deduction if PAN Card is provided or else 20% TDS deduction. Such an employee will not be eligible for any PF and ESIC facility and Casual/Earned Leaves.*
- 6) *Such an employee will be eligible for Retainer ship, Mediclaim facility, GPA facility and 14days leave as per State Holiday List and needs to declare that the employee is willing to join as a Service Provider and the management has not forced the employee to join.*
- 7) *Retiring employee will be eligible for an experience certificate issued by HR.*
- 8) *Company can retain an employee under Service Agreement till the age of 65yrs only. Beyond 65yrs if the employee is extremely required by the company, can work on Vendorship Contract basis.*

Appendix – 11

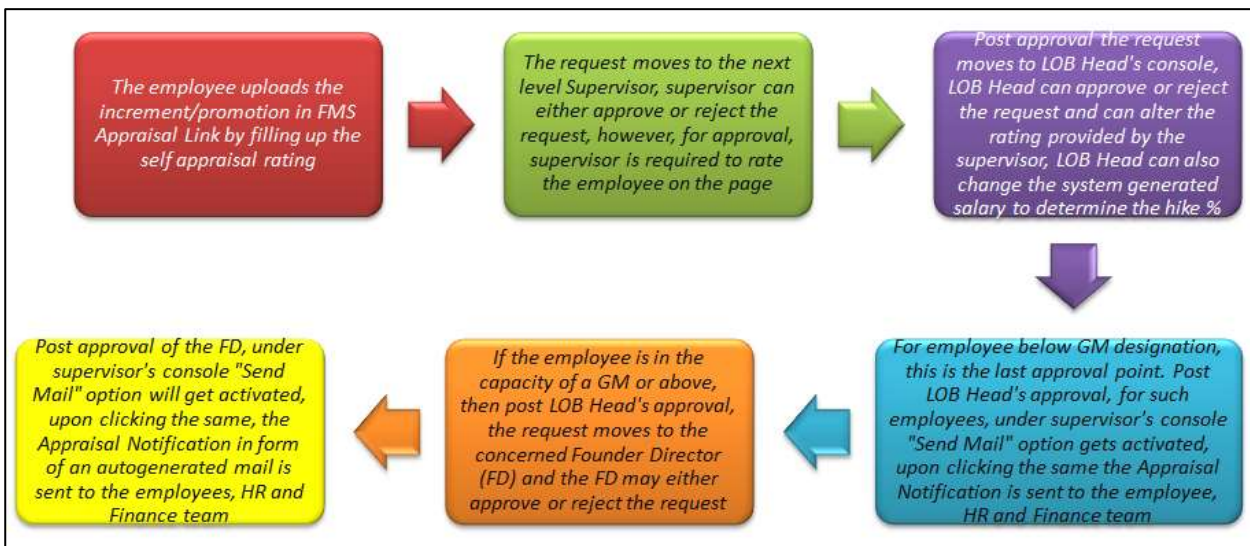
Increment & Promotion Process (effective 15th Feb 2022)

Increment and Promotion are critical motivational tools for all employees which are purely based on performance and business viability. As per the company norms, every employee can be considered eligible for an increment or promotion after they complete 1yr of un-interrupted service in the company. Promotions are based on business requirements and are typically for Payroll Employees only, thus, it is not a mandate for the company to promote any employee after 1yr or at any point of time if there is no requirement.

Types of Promotion : Promotions are of 2 types specifically –

- a) **Vertical Elevation** – This is the most regular form of promotion where there is a band elevation for eg. Assistant Manager becoming a Manager etc.
- b) **Lateral Promotion** – This is a promotion where the employee stays in the same band but moves to a different department or role for eg. Trainer becomes a Placement Executive, Centre Manager becomes an APM etc.

Process and Exceptions are mentioned below :



Exceptions :

- 1) Employees under DAP grid 1 or 2 are not eligible for any promotion or increment till the period of the DAP grid.
- 2) If any employee is required to be promoted or compensation revised in less than 1yr time then approval is required from Founder Directors which the LOB Heads are required to take before uploading the same in FMS tool.

Please note effective 1st Jan 2021, all promotions both Vertical and Lateral, along with designation, notice period will also change which corresponds to the elevated band.

For eg : If a Sr. Executive gets promoted to an Assistant Manager position, his previous 30days Notice Period will become 60days.

Appendix – 12

Unpaid Bench Policy

If a business unit is unable to sustain it financially or due to any other reasons there is a business instability for which the concerned unit is unable to bear the salary cost of the employees, but there is a clear understanding that the concerned unit will be back in business, then the LOB Head can seek support of HR to roll out Unpaid Bench policy in that particular LOB. But this cannot be imposed on employees but will happen with mutual consent for a period of max 6 months. Leaders are required to talk to the employees identified for unpaid bench and if employee agrees then a mail needs to be shared with the entire policy drafted and employee needs to share an acceptance on the same. The status of the employee in this mode of employment would be an Active employee in Hibernation. Following are salient features of the policy :

- 1) Minimum Regional Manager Level employee needs to execute this considering the sensitivity of the strategy.
- 2) One on One discussion needs to be done with the employee who has been identified for benching. All the below points to be explained properly during discussion.
- 3) The below format needs to be shared with the willing employees only marking, Vertical Head, LOB Head and HR (Arijit.majumder@orionedutech.com & admin@orionedutech.com).
- 4) The employee needs to accept this within 24hrs of sending the mail and the same needs to be forwarded to HR for further action. Employee will be marked LWP during payroll from the effective date mentioned in the mail.
- 5) During this period, employee is not required to mark his/her attendance or attend office or perform regular activities. Whenever, the company resumes it's operations, employee will be contacted to resume work.
- 6) This will ensure continuity of service and job security at Orion.
- 7) During this period, if employee wants to leave the organization, then he/she is required to discuss the same with the reporting supervisor and share a valid resignation e-mail with him/her. Post approval FnF Form to be filled up and shared with HR Team. Notice period waiver is completely the discretion of the concerned LOB Head.
- 8) However, if employee joins any other company without following the above mentioned process, then the same will be considered as Dual Employment and employee will be Terminated from job as per law.
- 9) If the company resumes operation and needs the employee's service however, employee is unwilling to join back though employee has not resigned before, then effective date of Unpaid Bench will be considered as the employee's Last Working Date and in this case the continuity of service will not be considered. Separation process will be followed by HR Team.
- 10) In the event when company is unable to resume its operations at the location or the business viability doesn't support the manpower requirement, company reserves the rights to lay off by providing 15days prior notice or 15days salary in lieu of it for employees below 1yr and for employees above 1yr, company will either provide 30days notice or 30days salary in lieu of it provided the reason for separation is not due to Disciplinary Issues or repeated incorrigible non-performance or Anti-National/Criminal activities. In this situation continuity of service will be considered and last working day will be considered as the day the separation information was conveyed.

HR team will consider an employee under unpaid bench only if there is a valid acceptance received from the employee's end. ERP password will be reset, official mail password will be reset as well and FMS id will be blocked.

APPENDIX - 13

GIFT Policy

This policy governs accepting and presenting gifts of any nature within the company or outside.

- 1) No employees are allowed to accept any gifts from any outside bodies, who are directly/indirectly involved with the business of the company, which may be in terms of money, valuable items like precious metals, precious stones, vehicles etc or in kind like travel packages, etc. These will be considered as bribing and extremely unprofessional in nature. Violation of this policy can lead to serious consequences like Termination of Service as well. If proven HR will have the full discretion to take action as per DAP grid.
- 2) Employees who have planned for a personal occasion like marriage, rice ceremony etc, and have unofficially invited company officials can accept any ethical gifts but gifts of any nature from any external party invited who has a direct/indirect involvement with Orion business, in such an occasion, is strictly prohibited. Violation if proven will lead to serious consequences.
- 3) Employees who are involved in client management/sales and there is a need to entertain the clients (prospective or current) for the prospect of the business, can for sure provide gifts to the concerned clients like – Hosting a Dinner/Cocktail party, Gifts like mementos etc. But in no situation, employees are allowed to gift money, precious metals, precious stones, vehicles or anything which is unethical like promoting prostitution or human trafficking etc. Violation will lead to Termination from service.
- 4) In case if the client has invited Orion employees in an unofficial personal party, then employees can gift ethical presents from personal expenses and the same cannot be reimbursed from the company.
- 5) Any gifts to superiors or juniors with the intention to manipulate any decision or favor which may impact the company/business, is not accepted at all. Violation will lead to serious consequences for both the employees involved.

APPENDIX - 14

COVID guidelines for Orion

Office Sanitization Process :

- 1) Every morning the entire office which includes any area where footfall has happened on the previous day and the machines used, needs to be sanitized through fumigation process.
- 2) Office Boys and Housekeeping staff are required to clean the frequently touched areas every 2hrs daily. These includes, desks, door knobs, door handles, stair case handle, AC remote, floor area, washroom etc.

General

- 3) Usage of disinfectants is a must while sweeping the floors and other areas, specially washroom floors.

Employee Hygiene Guidelines :

- 1) All employees are expected to wear mask when reporting to office daily. Any employee forgetting to wear mask will not be allowed to enter office. Thus, before entering office all employees irrespective of designations are required to report to the Front Office/Security desk first.
- 2) Security will have the Thermal gun which he will use to monitor body temperature of the employees while reporting to office. If the temperature is anything above 98.4 to 99 degrees then the employee will be asked to leave office immediately. Security needs to maintain a register and note down the details of the employee who is getting returned for which ever reason and inform concerned HRBP on daily basis.
- 3) If the employee has a stable body temperature for the next 3days, then he/she can resume work. This employee will be checked again at the security desk if no anomaly is detected then employee can resume work.
- 4) All these returned employees can resume work from home for the said period and will be paid basis WFH policy. Thus, it is extremely important for the HRBPs to keep a note of all these cases along with dates.
- 5) Security will spray the sanitizer on the hands of the employees while entering office and no employees will be allowed touch the same.
- 6) Employees are required to open their foot-wears in designated areas of the building at their own risk, this will reduce the chances of contamination. Cleaners and office boys will fumigate the shoes as well during the day if it is okay with the employees. LOB Heads are requested to suggest areas where the employees can safely keep their shoes.
- 7) Employees are required to bring food from home and office boys will no longer bring outside food for anyone, neither employees will be allowed to warm food using office microwaves.
- 8) Tea henceforth will not be served in china cups but paper disposable cups will be used, thus, these would need to be considered as recurring expense for the LOB. No office cutlery and crockery will be used except for visitors and clients.
- 9) Water bottles are required to be personalized and employees are required to take these back home daily. Refilling will be done as per current process.
- 10) Once an employee steps inside the office, they are not allowed to step outside for breaks or for any other unofficial reasons. If for any official reason for which an employee needs to leave office, then prior approval of the LOB Head needs to be there where a concerned HRBP to be kept in cc. Employee is required to sign the out register while leaving. The details to be shared with the HRBP on a daily basis, the concerned HR Team will check if for every corresponding exit there is an approval from the concerned LOB Head. For employees directly reporting to the Founder Directors, mail needs to be marked to the concerned Founder Director keeping HR in cc detailing the reason for exit.

- 11) Upon returning the above mentioned sanitization checks to be done once again. Office Boys, cleaners and admin are certain profiles who are mostly on a roaming duty hence, they are exempted from the above approval process but each return would follow the same sanitization process.
- 12) All office boys are required to wear gloves mandatorily along with mask. These gloves are required to be sanitized every hour and should be personalized and not on sharing basis.
- 13) All chairs will be tagged and no one is allowed to sit on anyone else's chair unless sanitized.
- 14) Sitting arrangements should be such that min 6ft distance is maintained between 2 employees accordingly certain desks will become redundant and will be marked with a red cross. No employee is allowed to sit on the red crossed desks. If this poses a seating deficiency for employees, the concerned LOB Head needs to decide to roster people to come to office i.e. 50% people will come on Monday, Wednesday and Friday and the rest on Tuesday, Thursday and Saturday. The alternate day for each group will be WFH but with no salary cut. For HO based employees if the Saturday is on 2nd and 4th week of the month, then it is the sole discretion of the LOB Head whether to call people to office on that day, but if allowed Comp Off policy will not be applicable but will be considered as a normal day.
- 15) If an employee shows up any symptoms of the contamination then immediately the employee needs to be sent home and will only be back post he shares fitness certificate from a recognized doctor, alternate medicine practitioners will not be considered eligible to certify fitness. If the employee is tested positive for COVID, then contact tracing needs to be done within office and all who came in contact with him should be sent on home quarantine. WFH can be initiated but no salary cut to be done.

APPENDIX - 15

Amendment in Notice Period Policy

This policy states that irrespective of Age On Network, any employee getting promoted laterally or vertically from the 1st of Jan 2021, will be eligible for the notice period allotted to that designation. Currently following are the Notice Periods allotted as per policy :

Executive to Team Leader – 30days

Assistant Manager to Regional Manager – 60days

Zonal Manager, Assistant General Manager and Above – 90days.

For eg :

Lateral Promotion (same band movement) : Mobilizer gets promoted to a Business Development Executive – Previous Notice Period was 15days, new notice period will be 30days. If pre-promotion notice period was 30days then no change in notice period will be done.

General

Vertical Promotion (band elevation) : Trainer gets promoted as an Assistant Manager Training – Previous Notice Period was 15days or 30days, new notice period will be 60days.

APPENDIX - 16

Amendment in Saturday Working Policy

All RO/HO based employees from 1st Jan 2021, will observe WFH on all working Saturdays, with full salary. 2nd & 4th Saturdays will remain as Week Offs as per current policy.

APPENDIX - 17

Whistle Blower Policy

Definition : The policy aims at empowering the employees to raise concerns happening in the system which may be detrimental for the company and it's image. This helps the company leadership to establish an “ear on the ground” and works towards resolving the concerns for a better employee experience as well as save the company's image. Concerns raised can be related to Operational, Financial, Client Issues, Supervisor Issues, Process related etc which later can directly or indirectly impact the company and tarnish the image of the company.

- 1) This empowerment is extended to all the employees of the company where he/she have the rights to raise concerns which may impact the company directly or indirectly. Employee needs to be specific about the issue, must be able to provide evidences supporting the concern.
- 2) If the employee wants, his/her identity will be classified by HR team.
- 3) Concerns related to the employee himself/herself like less salary, no promotion, or leaves not granted etc to be dealt as Grievance Redressal and will not be a part of Whistle Blower. Issues that are/will/may effect a mass, can be a part of Whistle Blower.

Such issues to be reported to myvoice@orionedutech.com which HR team will have an exclusive access and if solution is possible from HR end then solution will be provided or else Director-HR & Ops to be intimated for escalating the concern to a higher up level for resolution.

APPENDIX – 18**Provident Fund Policy**

Effective 1st Nov 2022, all employees irrespective of salary buckets will be subject to PF deduction as per EPFO guidelines. 12% employee share, 12% employer share and 1% admin charges will be applicable on Basic Salary and Dearness Allowance or any other fixed allowances. If employee wants to opt out of the PF facility then he/she is required to fill up a PF opt out declaration form and send HR while joining in or else by default PF facility will be extended by the company. The max employee contribution will be Rs1800 as per norms unless employee has opted for Voluntary PF of VPF facility.

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