



Preface

Welcome to Bunts Tools Pvt. Ltd, home to the finest and most precise tools going into the largest variety of products in the world!!!

Bunts Tools Pvt. Ltd was founded by our Founding Father, Mr. Prabhakar K. Shetty, in the year 1984; and since then there has been no looking back. Bunts Tools Pvt. Ltd today has emerged as a leader in the field of precision tools because of its world class manufacturing practices and strong quality management system.

We have been catering to Indian and Global OEMs and the prime driver for our success is our policy of "No Deviation" from the ethical practices set down right from our inception. Our dedication to fulfillment of client requirements and the quality of our products reflects in the many awards, achievements and recognitions – the many feathers in our cap!

Our Vision

Bunts Tools Private Limited aims to be a world class organization & a most preferred supplier for precision machined components for the domestic & International engineering and related industry. We aim to achieve this by delighting all our stakeholders and establishing a comfortable and conducive environment for learning.

Our Mission

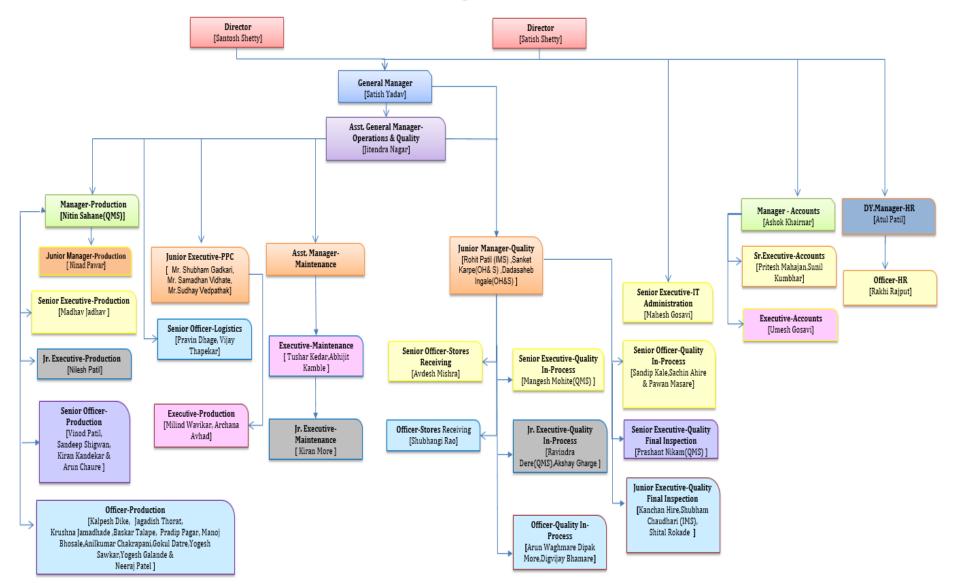
To be a Business partner:

- Who is committed to comply by needs and expectations on **QUALITY**.
- Who can provide **COST** effective solutions thru innovations and continual improvements.
- Who is determined to achieve **GROWTH** by adopting good manufacturing practices.
- Who strongly believe in operating on the fundamentals of ETHICAL business.



Annexure A





Contents of the Human Resource Manual



Code of Conduct



We, at Bunts Tools Pvt. Ltd are committed to bring together all our stakeholders for a fruitful and prosperous future through our business activities. To achieve this, it is essential that we all together follow a code of conduct which reflects our philosophy, values and ethics through our behavior.

Below is the code of conduct which we expect every person associated with Bunts Tools Pvt. Ltd to follow irrespective of position or designation. 1. We at Bunts Tools Pvt. Ltd are committed to provide equal opportunities to all our stakeholders irrespective of national origin, military status, caste, religion, marital status, gender, gender expression, sexual orientation, age, nationality, ethnic origin, disability or any other category protected by applicable law.

These activities include, but are not limited to, hiring and firing of staff, selection of volunteers and vendors, and provision of services. We are committed to providing an inclusive and welcoming environment for all members of our staff, clients, volunteers, subcontractors, vendors, and clients.

We are also committed to be an equal opportunity employer. We will not discriminate and will take affirmative action's to ensure against discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, color, gender, national origin, age, religion, creed, disability, veteran's status, sexual orientation, gender identity or gender expression.

2. We are committed to recruit, train, develop and promote our employees based solely on their performance, merits, competence and potential.

3. We are committed to promoting policies which are fair, transparent and which promote equality and diversity in our organization.

4. As a part of Bunts Tools Pvt. Ltd, we all are expected to maintain highest standards of behavior and conduct with not only each other but with all our stake holders.

5. Our leadership is responsible to build and sustain an environment conducive to an individual's dignity, creativity and privacy.

6. Our leadership and every single team member of Bunts Tools Pvt. Ltd agree not to tolerate any form of harassment, whether sexual, physical, verbal or psychological. We agree to report any such untoward incident whether with self or others immediately and commit to serve justice through fair disciplinary procedures which necessarily include the employees' right to be heard.

7. We firmly believe in an individual's Right to Dignity. Use of abusive language including shouting, use of swears words or any offensive language is strictly prohibited. Disciplinary action will be promptly taken immediately in such cases.

8. Every team member has a right to privacy and we will not interfere in their behavior outside the work environment unless it affects the organization or its work culture in any manner. In addition, if their personal behavior has an impact on the culture, discipline or overall environment of the organization, we reserve the right to take appropriate decisions related to the same.

9. We are strictly against child Labour and forced Labour and hold humanity at a very important position in our values.

10. Our employees and people representing us including any intermediaries or agents will not accept or offer any illegal or improper payments/gifts resulting in undue favors for the business or for them. Any such incident shall be treated seriously as a breach of code and shall invite disciplinary action.

11. Accepting an employment or position of responsibility or conducting a business out of employment with our company, with or

without remuneration and that which may or may not interfere with the employees' concentration and ability to work effectively at BUNTS TOOLS PVT. LTD shall be treated as a conflict of interest. Our employees are expected to disclose any information relevant to this as per the 'Conflict of Interest' clause of the code.

12. Our employees are committed to protect the integrity of information (financial and non-financial), knowledge, reports, records and any other intellectual property of the company knowingly or unknowingly. Employees are expected to follow highest level of integrity while disclosing any information to the company. Further guidelines are mentioned in the Confidentiality and Workplace Ethics Policy.

13. Our employees and directors are obligated to seek authorization before disclosing company related information in accordance with the company's communication policy. This is inclusive of any media of disclosure not limited to verbal, email, internet etc.

14. We are committed to safeguard any data provided to us by our employees in accordance with the company policies.

15. Our employees are obligated to safeguard the confidentiality of all third-party intellectual property and data. Our employees shall not misuse any such intellectual property and data that is in their possession. Employees shall not share it with anyone unless required to by the company's policies.

16. Our Directors and employees are obligated to disclose any loss, theft or destruction of any property – intellectual or physical; immediately whether it belongs to the company or any third party connected to the company.

17. Our employees will use any tangible and intangible assets of the company given to them to facilitate their work carefully. They are committed to use these assets with utmost responsibility and for the facilitation of their work.

18. We are committed to the safety of our employees and thus discourage use of mobile phones in the operational areas. This is for the safety of the employees and to avoid any untoward incident near the machines. However, the employees may use their mobile phones in case of emergencies in the changing rooms.

19. We are committed to comply with all applicable anti – money laundering, anti – fraud and anti – corruption laws and we shall set up mechanisms to prevent and deal with such incidences appropriately.

20. Our Directors and employees are committed to be ethical and thus not practice any form of insider trading or unethically provide assistance to friends, family or other associates to do so.

21. Use of any drugs or other prohibited substances like alcohol, tobacco etc. is strictly prohibited and such use will not be tolerated. 22. We strongly advocate any use of social media used by our employees in connection with Bunts Tools Pvt. Ltd or otherwise be done with a sense of utmost responsibility. We expect our staff to examine any information being posted by themselves to the social media and make sure any of their information shared is not harmful to them or BUNTS TOOLS PVT. LTD solutions in any possible way.

23. We are committed to make effective efforts towards our responsibility to the environment. We expect our staff to use water and electricity optimally. Every member of the staff should

remember and follow to switch off lights, fans, electrical equipment etc. when not in need; and should commit to conservation of water in whichever way possible.

24. We also are committed to disposal of trash in an ecological way. Every employee shall dispose trash only in the designated trash bins/collection areas. All the team members shall be committed to cleanliness and shall ensure that their peers follow these rules.

25. Employees must not organize celebrations or other events in BTPL premises without the express permission of Department Head, Plant Head & HR Manager. This applies no matter where or when the function, party or event is held.

26. As BTPL treats its employees as family, and support in the event of medical emergency, it prohibits the collection of cash among employees for the benefit of an individual employee. An employee may not use his/her official position/ status to endorse any such collection of funds.

27. Unreasonable behavior: - Although an employee's conduct may not violate the code of conduct or BTPL Policies, if a reasonable person would conclude that the employee's workplace conduct is inconsistent with BTPL values or any conduct standard established in this policy, then the employee may be subject to disciplinary action for the Lapse in Professionalism if warranted under the totality of the circumstances. 25. In case a concern is to be raised with reference to a breach of this code, employees can follow the below process to get a redressal –

1. Speak to your immediate reporting manager/supervisor or the HR department of the organization.

2. Speak to the directors of the company.

3. Any other communication channel set down in the whistle-blower policy of the organization.

4. If you feel that you or someone you know has been harassed or subjected to retaliation for raising a concern or reporting a case, we encourage you to promptly talk to the HR department or to the Directors.

The above code of conduct is comprehensive and may be added upon from time to time to suit the dynamic nature of the business environment. The code of conduct should be adhered upon and shall not be compromised under any circumstance.

Self - Declaration

Name of Employee:	Employee Id:
Department:	Designation:

I hereby declare that I have read and understood the code of conduct and Confidentiality and Workplace Ethics Policy laid down by my organization which is Bunts Tools Pvt. Ltd. I hereby promise to follow the code of conduct and shall by no means compromise the code under any circumstance. I also promise to abide by the Confidentiality and Workplace ethics policy and recognize that the breach of both these policies is a serious offence which might result in termination or more.

As a member of the team I stand by my team and shall help my fellow team members to uphold the sanctity of this code and create awareness of the same in my team.

Signature: _____

Date: _____

Place: _____

Confidentiality and Workplace Ethics Policy

Objective:

This policy is prepared with the purpose to elaborate the guidelines for confidentiality and workplace ethics in line with the code of conduct of the organization.

Scope:

This policy is applicable to all employees of Bunts Tools Pvt. Ltd.

The confidentiality guidelines shall be applicable to each employee even after termination of services.

Preamble:

1. The Employee has been employed by the Company to perform various services for the Company.

2. The Company has in its possession certain Confidential Information that the Company has disclosed to the Employee, or that the Employee was exposed to during the Employee's employment with the Company.

3. The Company is also committed to ensure that ethics is the fundamental principle for functioning of the organization.

Policy elements:

Confidential and proprietary information is secret, valuable, expensive and/or easily replicated. Common examples of confidential information are:

- Unpublished financial information
- Data of Customers/Partners/Vendors
- Patents, formulas or new technologies
- Customer lists (existing and prospective)
- Data entrusted to our company by external parties
- Pricing/marketing and other undisclosed strategies
- Documents and processes explicitly marked as confidential
- Unpublished goals, forecasts and initiatives marked as confidential

- Technical information and specifications, manufacturing techniques, systems, processes, methods of production, designs, circuit diagrams, blueprints, electronic artwork, samples,
- Marketing and business information
- Employees may have various levels of authorized access to confidential information.
- Employees commit not to involve in unethical practices like favoritism, gifts from suppliers, overlooking quality & delivery requirements set for suppliers for monetary benefits.
- Employees commit to inform the management if any of his/ her colleagues are indulging in the same.

What employees shouldn't do:

- 1. Use confidential information for any personal benefit or profit.
- 2. Disclose confidential information to anyone outside of our company.
- 3. Replicate confidential documents and files and store them on insecure devices.
- 4. Indulge in Unethical practices as outlined in the policy.

Upon termination of employment with the company, employees are obliged to return any confidential files and delete them from their personal devices.

Disciplinary Consequences:

Employees who are found to have deviated from the Confidentiality & Workplace ethics policy will face disciplinary and, possibly, legal action.

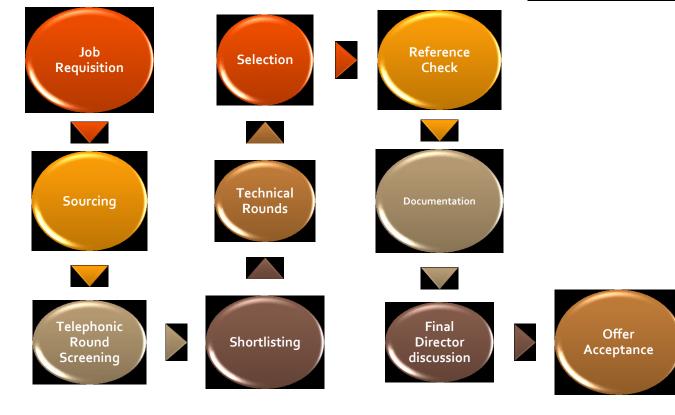
Every breach of this policy shall be investigated. Any employee who has willfully or regularly breached our confidentiality guidelines for personal profit or otherwise shall be immediately terminated and further legal actions shall be pursued against them. Any unintentional breach of the policy shall be punished too based on the frequency and seriousness of the breach. Termination of employees shall be immediate in case of disregard to this policy even unintentionally.

The policy shall be binding even after separation of employee.

Recruitment Policy

The objective of the policy is to ensure that the recruitment process at BTPL is consistent, fair and uniform irrespective of time, location and position. This policy provides a structure framework for recruitment and selection through competent sources. This policy also lays down the procedure for how recruitment and selection sha BTPL.





Trainee Period

We have a training period of minimum 12 months. We believe this period is better utilised to learn our processes & adapt organization culture. If the performance of the new recruit is satisfactory; the employment will be further considered for probation. The trainees shall be applicable for all statutory deductions like PF, ESIC and PT.

Probation

We have a probation period of minimum 6 months. We believe this period is better utilised to get to know each other decide whether we can work together. If the performance of the new recruit is satisfactory; the employment will be confirmed with a proper feedback session. The aforesaid deduction of PF, ESIC and PT shall also be applicable for probation period.

But if we find that there is a scope of improvement in your performance before you can be confirmed; we discuss with immediate supervisor and give an extension with defined key result areas for the employee. If these result areas are achieved then a confirmation of position is extended else, we are unable to continue the association.

Transfers

There might be good opportunities which we feel you are best to handle and thus we might have to move you to different locations or departments. At BTPL, movements mean progress and thus you should get excited for inter or intra departmental transfers. The transfer decisions will be taken based completely on the need for your skills at the different location or department.

Induction Policy

Objective:

To ensure that each new recruit is thoroughly aware of the organization's culture, products, procedures, policies, benefits, etc.

Scope:

The policy applies to all employees of Bunts Tools Pvt Ltd.

Responsibility & Accountability:

HR department and HOD's will be responsible & accountable for the overall system.

Procedure:

Fix Induction Schedule of the Month

- Induction is to be planned once every week.
- The Induction shall be carried out for employees joining after the previous induction till day of induction.
- The employees joining after this day shall be included in the next schedule.

Involvement

- Each department should be involved in the Induction process.
- A departmental presentation is to be submitted to HR which needs to be updated from time to time with any advancements or changes in the respective department.
- The responsibility of the up-gradation of presentation lies with each department head and the coordination of the same shall be done by the HR department.

Process

- HR should introduce new recruit/s to department colleagues, HODs, etc. Simultaneously shop floors, pantry, lunch area, restroom etc. should be shown to them. Also Inform new recruit's regarding lunch time, tea and snacks time.
- Update new recruit with contact details of most required departments and services.
- Respective department head or representative shall present their departmental presentation to the new joiners and solve queries if any.
- At the end of each presentation, the representative or the department head shall sign the induction form to record that the respective department has played its part in the induction.
- A feedback form is to be filled by all new joiners which will help us understand the effectiveness of the Induction Program.

Leave Policy

Objective:

The objective of this policy is to explain the leave entitlement and procedure for availing leaves.

Scope:

This policy is applicable to all units and employees of the company. The responsibility and accountability of implementation of this policy lies with HR department.

- 1. The year to be considered for the purpose of leave policy will be from 1st January to 31st December Calendar year.
- 2. All Confirmed employees (on successful completion of probation period) will be eligible for 15 privilege leaves in a calendar year after completion of a total 240 working days. Any leave taken before completion of probation period will be treated as a Leave without Pay.
- 3. Employees may also avail total of 10 leaves (5 Casual + 5 Sick) for managing their medical/other exigencies.
- 4. Employees will be eligible for availing the Casual/Sick leaves after completion of their probation period. These leaves will be credited to the employee on pro rata basis.
- 5. All leaves will be credited to each employee on pro rata basis i.e, total leaves divided by 12 months. No leaves shall be carried forward to the next year.
- 6. We recommend our team members use these leaves within the year(maximum one-week privilege leave at a time). No leaves shall be carried forward and if unconsumed at the end of the year shall been en-cashed.
- Privilege Leave not availed will be en-cashed once a year in December salary paid in upcoming month of January. Please note that PL encashment of leave is part of CTC.
- 8. Privilege leave has to be applied and approved at least 7 days in advance. This rule is waived off only in case of emergencies or where communication is not possible at all.



9. Not more than 2 consecutive days of leave will be approved unless preplanned.

10. Any privilege/casual/sick leave taken as a prefix and suffix to a holiday or day off will be treated as Sandwich Leave and thus the holiday will be treated as a leave too.

Public Holidays

Employees will be entitled to nine paid holidays including the below mentioned four national holidays:

- 1. 26th January Republic Day
- 2. 1st May Labour Day / Maharashtra Din
- 3. 15th August Independence Day
- 4. 2nd October Gandhi Jayanti

In the event of severe weather conditions, voting day or any other emergencies, the company may decide to declare the office closed. In such cases, an official communication regarding the closure for the office will be sent by HR department. No loss of pay will occur in such a case. The company, however, reserves the right to compensate for this by working on a scheduled holiday.

SHORT LEAVES

- In order to deal with certain urgencies and personal tasks, an employee may avail a two hour leave from work twice every month, not exceeding 15 in a year.
- These Short Leaves cannot be carried forward to the next month and will lapse at the end of every month.

COMPENSATORY OFFS

- Employee who has worked on a holiday/Weekly Off is eligible for a compensatory off.
- The staff has to avail these compensatory offs within 2 months and they shall not be encashed.
- However, this has to be approved by the Reporting Authority with appropriate justification for such extra work and efforts. COMP OFFS while clubbed, maximum 2 Comp-Off leaves can be taken at a time only.
- A person who has worked for not less than 4 hours on a holiday is eligible for a half day compensatory off and for more than 6 hours worked they may avail a full day off.

LEAVE ENTITLEMENT FOR OPERATORS AT FACTORY

- The list of public holidays for operators will be circulated at the beginning of the year to the factory.
- Total leave entitlement for operators in factory is 20 throughout the year; credited on pro rata basis of 1.7 days a month.
- Operators are eligible to avail these leaves after 240 working days in the last calendar year.
- These leaves will be encashed at the end of the year if unutilized.

LEAVE PROCEDURE

- Leaves will be routed through the Reporting Manager.
- Mere submission of leave application would not entitle an employee for leave. Reporting Manager should approve the same. It is the responsibility of the employee to take the approval of the reporting manager.
- The operators need to take approval from their reporting supervisor/plant head for leaves.
- In case employee wants to avail leave due to health reasons, employee needs to intimate Reporting Manager as early as possible. On resuming duty, leave application should be filled and submitted along with the Medical certificate duly approved by the Reporting Manager.
- Please note that leave without pay is an unauthorized form of leave and requires special approval by the reporting manager, in case no leave is available to your credit.
- All intervening holidays during the leave period would also be considered as leave.
- HR department in corporate office and plant heads in the factory will maintain the leave card and record of leaves for ease of calculations.

Attendance Policy

Objective:

The objective of this policy is to set forth guidelines and procedures to handle employee absenteeism and to promote efficient operation of the organization and minimize unscheduled absences.

Scope:

The policy applies to every employee at all locations of Bunts Tools Pvt. Ltd.

GUIDELINES

A. Working Hours

- The working hours for staff at all our locations will be: **9.00 am to 6:00 pm.**
- Shift Timings for Operators will be:
 - Shift 1: 7 am to 3:30 pm
 - Shift 2: 3:30 pm to 12:00 am
 - Shift 3/Night: 11:30 pm to 7:30 am
- Owing to certain work schedules or profiles; some employees may be assigned different work hours and these will be agreed between the Management and the employee.
- To maintain decorum of the office, employees are requested to arrive on time or at least 05 minutes prior to the punch in time.

B. Break and Lunch Hours

- Lunch break will be from
 - Operators: 12:00 PM to 12:30 PM
 - Staff: Staff may take the break between these 2 time periods depending on the meetings/work 1 PM to 1:30 PM AND 1:30 PM to 2 PM



- Tea Breaks 2 breaks of 10 minutes each.
- Regular Shift Timings (Staff and Operators): 10 am, 2 pm and 5 pm
- Night Shift Timings (Staff and Operators): 10 pm, 2 am and 5 am
- Employees should ensure they adhere to the break times and not engage in frequent breaks during working hours which may result in hampering the productivity.

C. Attendance Guidelines and Policies

• The employee is required to regularly punch their attendance in the bio metric machine.

If for some reason, an employee has been unable to punch in the bio metric attendance;

they should immediately. Initiate his punching regularization process in HR software & get approved the same from his reporting manager.

- If employees have unexpected personal business to take care of, they must notify their direct supervisor & HR Manager/Officer to discuss time away from work and make provisions as necessary.
- Employees should make sure that they mark their attendance daily, failing which they will be marked absent and the same shall be deducted from the salary as Late Coming/Loss of Pay.
- Norms for salary deduction/leave deduction will be as below -
 - First 3 late marks in the month will be allowed as grace timing up to 10 minutes. For any late mark more than 10 minutes or from the 4th instance onwards, a short leave/half day leave/salary deducted.
 - If the employee has exhausted their short leaves as per policy; then a half day will be deducted and if other leaves are exhausted too; then half day salary will be deducted.
 - If the employee has taken a half day leave and reports after completion of 4 hrs. of his shift timing, then the entire day will be deducted as a leave.
 - In case an employee has been travelling on duty; rules for late coming the attendance has to be regularized with the Head of Department and HR.
- If an employee has to be out of office during the start or end of office timings and is unable to punch in the attendance on time; the immediate reporting manager should be informed of the same along with the HR department.
- If delayed due to unforeseen circumstances, please ensure that information is given to Reporting Manager at least one-hour advance before duty commences.

- Employees who do not adhere to above policy will be subjected to disciplinary action, including termination of employment.
- Excessive Absenteeism
 - Excessive Absenteeism is defined as regularly taking leaves (without approval or uninformed leaves) counting up to a minimum of 2 days every month or 1 day randomly in every week.
 - Employees determined to be excessively absent will be subject to disciplinary action which is up to the discretion of the Management and HR.

• Absconding

Unauthorized leave of absence of more than 7 days will be considered as absconding. Absconding is not encouraged and will be dealt with as per Management Decision.

Maternity Leave Policy

Objective:

The objective of this policy is to educate all female employees on their right to access Maternity Leave during their pregnancy.

Scope:

This policy is applicable to all confirmed female employees of Bunts Tools Pvt. Ltd.

Guidelines:

Subject to the provisions of the Maternity Benefit Act 1961, a female employee who has been in continuous employment with the company for not less than eighty days in the twelve months immediately preceding the date of her expected delivery is entitled to Maternity leave. The maximum period for which any employee shall be entitled to maternity benefit shall be twenty-six weeks, of which not more than 6 weeks shall precede the date of expected delivery.

Employees will need to give notice to the company of their impending confinement at least eight weeks in advance, supported by a medical certificate to such an effect. This is to be submitted to the HR department prior to proceeding on leave.

In exceptional circumstances leave with appropriate approvals from the Senior Management will be considered. Female employees would be eligible to claim this benefit for a maximum of two deliveries only. Maternity benefit would not be available for any deliveries in excess of the above. It is further clarified that female employees who have joined services and already have two children would not be able to claim any maternity benefit during their service tenure with the Company. The Company may, at its discretion, grant leave of any other kind, admissible to the employee in combination with, or in continuation of, maternity leave if a sufficient Medical Certificate supports the request for its grant. For more details, employees are to connect with HR department.

Communication Policy

Objective:

Communication systems enable the exchange of effective and efficient information. The objective of this policy is to advice the employees on how to effectively communicate for business success.

Scope:

The policy is applicable to all employees of Bunts Tools Pvt. Ltd as everyone is required to communicate within the organization and with external communities/institutions/ consultants /executives.

Responsibility and Accountability:

Respective Heads of Department and the Human Resource Department will be responsible for the successful implementation and subsequent adherence to the terms of this policy.

Definitions:

External Communication: An exchange of information which occurs between the organization and external parties like clients, suppliers, Service Providers, etc. **Internal Communication:** An exchange of information which happens within the

organization including inter departmental communication.



Guidelines:

Use the following communication methods:

- **Email** (whenever possible to save time and to provide documentation which is dated)
- **Telephone calls** (between individual employees, to discuss and negotiate. Confirm with an email if necessary)
- **Meetings** (to inform and discuss issues and make decisions. Note that meetings can be time-consuming and should only be held when communication by telephone, email

or another medium cannot achieve the desired outcome)

- Minutes of meeting (formally communicate decisions of the meeting and also information to external parties and internal employees)
- WhatsApp Communication: Any communication on official or unofficial groups (related to Bunts Tools Pvt. Ltd) done on the WhatsApp application.

Following is the protocol with respect to email communication:

1. Response time:

Any email being received should be replied to within 24 hours independent of the fact whether the task has been completed or not. An appropriate revert is to be sent with required timelines/details/answers etc. to the incoming emails.

2. Courtesy:

Use proper courtesy to address people. Make informed decisions while using courtesy titles like Mr., Mrs., Ms. etc. Use of first names should be only when you are sure the recipients culture allows it.

3. Use of verbal/telephonic communication:

Employees should feel responsible to select an appropriate mode of communication when emails fail to meet the objective. In case an immediate response is required, a telephone or verbal conversation should be used to ensure that relevant feedbacks are exchanged.

4. Use of to, cc & bcc in emails:

- Mark a CC only to those, whoever you feel should know about the subject/content of the email. Unnecessarily marking CC to many people creates confusion & does not add any value.
- Do not mark CC to MD or HODs if it is not relevant, for e.g. CC is not required to be marked for general interdepartmental communication. In a way, CC to Directors / HOD should be marked only when the matter is very important and their attention or intervention is required.
- Adding too many people as the principal recipient

(adding email address in to) creates confusion.

- Avoid using BCC as the recipient of the email marked in "To" or "CC" will not know who is marked in BCC.
- Use BCC only in exceptional cases where you do not want to disclose the identity of the person to whom the email is being marked to, for e.g. if email ids of directors are not to be shared then bcc can be marked.

5. While forwarding the email:

While forwarding internal email to outside parties, write specifically what you are expecting and mark only necessary portion of the email for which you are expecting action from the other person.



6. Interdepartmental email:

Avoid exchanging of email on the same subject if the issue is not getting resolved and there is only exchange of email back & forth. Instead, have face to face meeting or telephonic call.

7. Content and subject of the email:

Don't write lengthy emails. People do not like reading stories; it should be crisp, there should be the use of bullet points, small paragraphs and proper subject in the subject line. Ensure that grammar is checked and spell check is done.

Also, the subject of the email sometimes remains the same whereas, the content and discussion in the email has changed. This has to be paid attention to and changed to match the content of the email – even though the same trail is being followed.

Also, the Re:, FW: etc prefixes in the subject line have to be removed as it repeats multiple times due to following the same trail.

8. The gravity of the matter:

If there isn't a timely revert received from a recipient, don't hesitate to pick up the phone and speak. Don't rely on email in case of urgencies and make a decision to speak to the person. Follow ups are important to ensure that the communication has been received and replies have been sent.

9. Signature:

Always ensure email has got a signature which contains your name, designation, contact details, and any other details which are a requisite of the business so that all marked in the mail gets your required information and can reach you when required.

10.Size of attachment:

Mind the size of attachments being sent on email. Try to compress large files before sending to make downloads easier for the recipient.



Following is the protocol with respect to verbal communication:

1. Always be mindful of the language used in a verbal communication irrespective of whether it is a telephonic call or a face to face communication.

2. Respect and dignity is to be maintained at all times irrespective of the position, designation, gender, age, caste, religion,

race, ethnicity or any other demographic of the person.

3. There will be zero tolerance for any language or gesture amounting to disrespect, harassment or a behavior which is unacceptable in a healthy conversation.

4. Use of swear words have to be avoided at all costs irrespective of pressures or disagreements. There has to be a respectable way of disagreeing with people not involving rudeness, arrogance and swearing.

Following is the protocol with respect to WhatsApp communication:

The application WhatsApp is being used rampantly today for all types of communication. There are official and unofficial multi user groups which allow us to communicate with Clients, Third Party representatives and internal teams. It is vital that we use this mode of communication selectively and responsibly while communicating about anything related to the organization.

Following protocols to be followed while using this application for communication related to the organization.

1. While using the application, care needs to be taken that any information being passed is verified and correct.

2. Any communication related to the organization should be on official groups

and care should be taken while speaking of any matter which is official. Any communication which disturbs or spoils the environment of the organization shall be dealt with disciplinary action leading to termination depending on criticality and seriousness of the communication.

3. WhatsApp is to be used as a tool of effective communication to enable swift responses. The tool should be used to



communicate important subjects for quick decisions or information passing.

4. Any unnecessary forwards which have no relation to the organization should not be put on official WhatsApp groups within the organization. Wishing each other on personal matters like festivals or birthdays can be done on personal chats and should be avoided on Official groups.

5. It is suggested that if employees are to connect on unofficial groups with each other, they do so with responsibility. Any communication leading to spoiling of environment at workplace will result in a disciplinary action.

Travel Policy

Objective:

The travel policy is intended to facilitate business related travel while managing costs and maintaining efficient business processes.

Scope:

The policy applies to all employees at all locations of Bunts Tools Pvt. Ltd.

Responsibility and Accountability:

HR/Admin and accounts department are responsible and accountable for implementation of this policy.

Travelling norms:

When an employee is going to go on an outdoor visit for official purpose, he/she has to fill in the Outdoor duty (OD) form and get it approved from his HOD and submit the same to HR department.

Intra-city conveyance:

Sr. No	Mode of travel	Reimbursement amount	Class of employee
1	Two wheeler	Rs. 3 Per Km	At all levels
2	Four wheeler	Rs. 7 Per Km	At all levels



Note:

Based on the forms maintained by the HR Department, Accounts department will process the local conveyance amount on monthly basis.

All exceptions with respect to above policy will be dealt on merits and subject to approval by HOD and directors.

Travel within India:

Category of cities within India is as defined below:

Tier I cities - Mumbai, Kolkata, Chennai, Bengaluru and Delhi, Nagpur, Pune, Lucknow, Hyderabad, Ahmedabad, Jaipur, Coimbatore, Chandigarh, Baroda, Patna, Bhopal, Jodhpur, Vizag, Indore, Allahabad, Surat, Kanpur.

Tier II cities - Rest all cities

Travelling Outstation Allowances (within INDIA):

For outstation travel within the country; all travel and stay arrangements will be made by the administrative support in the corporate office.

In case any arrangement is made by a staff; the reimbursement claim for the same should be supported with an approval email from the HOD/Reporting Authority.

Food Allowance of maximum Rs. 500/- per day shall be given for a travelling employee. If amount exceeds the limit; special approval to be taken from the HOD.

Accommodation and Travel reimbursements shall be made at actuals.

Other Guidelines:

- 1. Expenses in connection to purchasing gifts for official guests should be pre-sanctioned by directors.
- 2. All allowances mentioned above are basic amount i.e. without taxes and all employees are requested to take the bills on the name of the organization with GST no.
- 3. Food expenses include breakfast, lunch, tea/coffee, water and dinner. Alcohol, tobacco as a part of expense claim is strictly prohibited.
- 4. If HOD and subordinate are travelling together then it is requested that they book a double room instead of booking 2 separate rooms. (In case of male & female travelling together 2 separate rooms are required).
- 5. It is advised that in case of a female employee travelling alone, it is suggested that the company make the bookings in a hotel, which is cost effective to the level of 3 star.
- 6. If a customer has paid for expenses on behalf of the employee, then employee will not be entitled to claim any allowance.
- 7. If employee has paid on behalf of the customer then the same can be claimed at actual after approval from directors.
- 8. All exceptional cases of late comings to office due to late arrival from travel will be dealt on merits and will be approved by HOD and Directors.
- 9. Any deviation with respect to mode of travel, stay, boarding, lodging and transport other than specified above shall require prior approval from directors.
- 10. The employee should give updates to HOD/directors everyday via email so the HOD/Directors are aware about the status of work done and the log in and logout time is to be updated via what's app or text message to HR.
- 11. All employees are hereby requested to check authenticity of the bills i.e. check whether relevant tax numbers are mentioned and the bills are duly stamped and signed. In case of cash memos whether they are serially numbered and stamped. Estimation bills will not be entertained.
- 12. After coming back from business tour, a travel report, Minutes of the meeting in the prescribed format must be submitted to HOD along-with the travel reimbursement form in 3 working days. This will be supported by proper bills and after approval from HOD; the same is to be submitted to accounts department for reimbursement.

Any case of travel claims involving deliberate, wrong claim or with a motive of monetary gain will be dealt strictly & may lead to termination from the services.

Loans & Advances Policy

Objective:

The purpose of this policy is to ensure that employees are provided with the facility of loans and at the same time to ensure that undue benefit of the same is not taken.

Scope:



This policy covers all permanent employees of Bunts Tools Pvt. Ltd.

Responsibility and Accountability:

HR department along with accounts department is responsible & accountable for this policy.

Guidelines:

Any employee can take loan against salary subject to the following conditions:

- 1. He/ She should be a permanent employee of the company.
- 2. The application for the loan will have to be made in the approved format only.
- 3. The reason for loan will have to be justified.
- 4. The sole discretion of accepting the loan application or not will be on the Company.
- 5. Loan amount will be maximum 2 Months Gross Salary.
- 6. No second loan can be taken unless the first is paid fully.
- 7. Repayment of loan will be in installments to be cut from the salary periodically.
- 8. Year for the purpose of this policy will be from 1st January to 31st December.
- 9. The interest rate to be charged (if any) will be defined by the company.



Training and Development Policy

Objective:

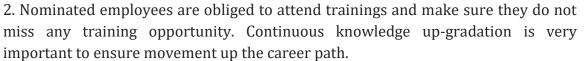
Training and Development are a crucial part of growth at BTPL. In order to ensure the professional and personal development of our team we have put forth the following policy.

Scope:

This policy is applicable to every employee of the organization (Staff and Operators).

Procedure

1. Training or development programme shall only be offered after a thorough needs assessment by the Human Resources Department in consultation with the Department Managers.



miss any training opportunity. Continuous knowledge up-gradation is very important to ensure movement up the career path.

3. In the event where a nominee cannot attend a particular training for one or the other reason, such nominee should inform the HR Department and Department Head in writing at least three working days before the commencement of the training. Shorter notice through the same procedure shall only apply in the event of unforeseen circumstances, such as illness, death, unplanned leave, and the like.

4. Trainees shall be nominated by their respective immediate supervisors with relevance to their training needs and development plan, whereupon the HR department will consider such nominations for confirmation, or otherwise.

Any training identified by individuals shall also be considered. Where these activities are deemed important by the company, an equitable selection process of who shall attend the training shall be made and the company shall fully or partially fund the training subject to the following conditions:

- The employee must submit a formal application to his supervisor;
- The application shall be forwarded by the supervisor, with his/her recommendations and comments to the Head of Department;
- Approval will thereafter have to be obtained from the Director. ۲

The sequential process of the HR Department shall be to:

- 1. Determine the training and development needs for the staff and operators.
- 2. Training needs for operators will be determined through their skill matrix.
- 3. Determine training needs for staff based on interactions with HODs and Director in line with the requirements of the business plan and future.
- 4. Prepare a training calendar for the financial year
- 5. Select appropriate training agencies to fulfil learning objectives for the year
- 6. Coordinate the trainings with external and internal training agencies/resources.
- 7. Ensure that the training calendar is followed and all trainings conducted as per schedule.
- 8. Collect and analyzed the training feedback and maintain the record.
- 9. Wherever feedback is less than 3.5, take corrective action
- 10. Conduct post training effectiveness activities and ensure trainings being delivered are effective.



Immediate Supervisor's shall be responsible for:

Individual Development Plans for all employees under their supervision, the relevant employee shall be part of this process.

Obtaining a template from the HR Officer who will be of assistance during the process.

Ensuring that their team members attend all trainings nominated for and facilitate the use of knowledge gained in the process.

Performance Management Policy

Objectives:

1. The objective of the Performance Management Policy is to assess objectively the performance of the employees.

2. Another objective is to ensure that the team achieves its performance targets in line with the Business Plan of the organization.

3. To ensure that good performances are appreciated and any corrections required in the performances are made on time.

Scope:

This policy covers every employee of Bunts Tools Pvt. Ltd. in all its locations.

Features:

- Focus on the development and utilization of an employee
- Transparency and openness in the system
- Emphasis on the potential assessment and career plan of an employee
- Identification of training and development needs
- Identification of strengths and improvement areas
- Review job expectations
- Check ongoing performance
- Recognition of employees for their contribution
- Building the Organization & Business

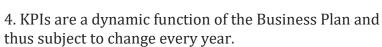


Guidelines:

1. Performance Management System is a system designed to define parameters of performance for each function, help employees achieve those parameters and measure the performance.

2. The employee will be eligible for appraisal only after completion of probation period in the organization. However, for new joinees KRAs and KPIs (KPIs will be fixed if applicable to the position) will be fixed immediately on starting the job.

3. The starting point for the PMS is to finalise the KPIs (Key Performance Indicators) for all functions based on the business plan.



5. Once the business plan is finalized; the KPIs are to be freeze for the Financial Year. This activity shall be ideally done in consensus with the Heads of Departments.

6. The HR Department shall map all the KPIs in line with Departmental Objectives and Organizational Objectives.

7. The Department heads shall make sure that all the relevant formats and documents are in place to review the KPI attainment.

8. Every month the HR shall drive an MRM wherein the

Management, along with the Department Heads will review the attainment of Departmental Objectives against targets taken.

9. HR, along with the Department heads shall conduct a performance feedback session at the start of every business quarter. The feedback shall be given for the business quarter ended.

Quarterly Appraisal	Review Period	KPIs to be reviewed by HOD
1 st Quarter	April – June	July
2nd Quarter	July – September	October
3rd Quarter	October – December	January
4 th Quarter	January – March	April

10. It is essential to provide an objective feedback to each and every employee for each quarter to guide them in achieving their KPIs every quarter rather than just a review at the end of the year.

11. The feedback should be given with "Sandwich" approach. HODs should ensure that they appreciate all the good work done by their team mates, articulate what went very well and then speak about what can be improved. No negative statements should be made.

12. Below matrix of performance metrics shall be used to define performances.

Rating Scale		KPI Achievement
1	Unacceptable	20%
2	Needs Improvement	40%
3	Meets Expectations	60%
4	Exceeds Expectations	80%
5	Outstanding	>80%

13. In case a person is given a rating of 3 or below by the immediate supervisor; the same should be justified to the Head of Department or the Director. HR has to ensure that all ratings are given without bias and in fair judgment of the performance.

14. If the performance rating of any employee is less than 3; appropriate counseling should be provided to the concerned employee. If after counseling the performance does not improve then appropriate action as per the guidance of Management is to be taken.

15. HR department shall maintain records of all appraisal ratings/feedback sessions in appropriate formats.

Management Review:

Based on the quarterly performances; Management team shall have a feedback session with the Heads of Departments to help them further progress in their objectives for their team and also for themselves. At the end of the year Management team shall take an objective decision for increment in salaries based on the performance achievement of the year.

Promotion Policy & Guidelines:

- 1. Employee should perform well consistently and continuously for minimum 2 years for Promotion.
- 2. Employee should have the requisite experience, qualification, potential and ability to perform for higher level job. 'Right Man for Right Job'-is the Mantra for promotions.
- 3. Promotion is purely discretion of the management and it may consider employees for fast track promotion purely on basis of exceptional performance.

Employee Engagement Policy Objective:

The objective of the policy is to create an environment where employees are brought together by common goal while nurturing their individual goals. The policy has been made to ensure that all individuals shall be valued for their contributions as well as diversity in all ways.

Scope:

The policy shall be applicable to all employees of Bunts Tools Pvt. Ltd.

Guidelines:



1. The HR department shall conduct an Employee Engagement survey once every 2 years.

2. The responses shall be analyzed by HR department to present an action plan-based report to the management.

3. Specific areas needing attention shall be identified from the results of the survey and a detailed action plan shall be finalized.

4. An engagement calendar shall be made which shall include team activities for team building, initiatives to percolate vision, mission and values of the organization, activities that shall increase citizenship behavior in the organization.

5. HR shall adhere to the calendar and also take feedback related to the activities from time to time.

6. HR shall maintain the historical survey results to find the trends for each parameter.

7. Top Management shall be involved closely with engagement initiatives along with HR.

Safety Policy

Objective:

To maintain a safe working environment, by providing safe systems of work, facilities for the welfare of the employees.

Scope:

This policy is applicable to all units and employees of Bunts Tools Pvt. Ltd.

Policy and Procedure:

Employees (Staff and Operators) working on the production floor may be exposed to risks related to the machine, chemicals, fire hazards etc. To ensure that the safety norms are followed at the shop floor, this policy has been laid down in detail. All employees should be aware about the safety policies and procedures and are required to follow them at all times.

Guidelines:

- 1. Continuous training should be provided to every person on the production floor.
- 2. The supervisors/floor managers shall ensure that operators and those near the machines use the Personal Protective Equipment (PPE) at all times. PPE includes apron, protective eye glasses, ear plugs, gloves etc.
- 3. Production in charge and safety committee members should ensure that any material classified as hazardous should be stored appropriately and accounted for at all times.
- 4. Proper lighting should be ensured in the work environment to maintain ideal visibility on the production floor, especially on the machines.
- 5. Safety Committee members should ensure the warning signage, proper usage signage, symbols marking hazards, safety pamphlets, etc are displayed on the production floor at all times.
- 6. The production floor should have a display board with contact numbers of firebrigade, ambulance numbers and hospitals.
- 7. Display details of employee response team members too on the floor.



- 8. Share information about location of safety boxes and first aid box with all employees.
- 9. Conduct safety meetings for operators and supervisors to make employees aware regarding fire safety drills and assembly points.
- 10. Conduct mock safety drills to ensure each employee is aware of the drill in case of an actual (fire/non fire) emergency.
- 11. Follow safe hygienic practices which include washing hands, wearing protective clothing, gloves, eye protection etc.
- 12. Ensure proper disposal of scrap, oil and any other wastes as per a proper process for disposal.
- 13. No Un-trained user should be allowed to operate any machinery or handle any material at any time.
- 14. Adequate fire extinguishers should be readily available in the premises.
- 15. Ensure that the workplaces are cleaned regularly and no oil spills are present on the any part of the floor.
- 16. Safety committee to ensure that no smoking, no tobacco, no substance boards are displayed on the floor.

Safety Committee:

A committee should be constituted by the management to ensure that the safety norms are followed and also to consider and review complaints of safety.

It will be the joint responsibility of the committee members to ensure that the safety norms are followed and all complaints are addressed, reviewed and solved. The committee should meet once a month to review trainings, safety measures, accidents etc. Emergency meetings should be convened whenever required.

Minutes of the meeting should be maintained and followed upon and also be shared with the Directors.

Asset Usage Policy Objective:

The objective of this policy is to define appropriate usage norms for assets provided by the organization. This policy encompasses norms for issue, usage and return of assets provided to employees to facilitate their work.



Definition:

Any asset/equipment provided to an employee to facilitate the operation of their tasks is covered under the term "Asset".

Scope:

- 1. Laptop/Desktop Computer
- 2. Scanner/Tab
- 3. Car/Bike/Fuel reimbursement

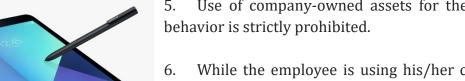
The eligibility of employees for any of the assets completely depends on the function, grades and the discretion of the HOD/Management

Guidelines:

1. The laptop/desktop computer/scanner/tab will be registered in the company's name and it is given for usage of official communication for execution of job and is not transferable.

2. The configuration and up-gradation of software in laptops/desktop/scanner/tab will be as per company policy.

- 3. In case where the employee decides to leave the company, the laptops/desktop/scanner/tab are to be returned to the HR department of the company without which he/she will not be relieved from duty.
- 4. The employee needs to inform the HR department immediately in the case where asset is stolen or damaged. He/she will be held fully responsible for any consequences on account of misuse of this facility and company will not be liable for any damage, loss, legal implication etc.



. Use of company-owned assets for the purpose of illegal transactions, harassment, or obscene ehavior is strictly prohibited.

6. While the employee is using his/her company email id any communication/data should not be deleted and should be handed over to IT department before relieving from company.

- 7. Installation of games, movies, songs, unwanted applications etc. on the asset is strictly prohibited.
- 8. Accessories provided with the package are standard like charger, wired head set, battery, etc. Other accessories, such as Bluetooth headsets etc, are not provided by the company. Employees may, at their own expense, purchase other enhanced accessories. Company does not offer technical support for enhanced accessories.
- 9. Lost, stolen devices must be reported to the local Police (FIR) immediately by either the employee or their manager. If an employee reports more than one lost, broken or stolen device in a 12-month period, the employee may be subject to appropriate disciplinary action regarding the misuse of a company asset. This action may include a deduction from the employee's pay for the replacement of the hardware.

10. Laptop/Desktop/Scanner/Tab assigned to one employee must not be loaned to, or used by, others.

Prevention of Sexual Harassment at Work (POSH) policy





Objective:

Sexual harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale, and performance of those affected by it. It may also have a damaging effect on other employees working in the company, who are not themselves the object of unwanted behavior but who are witness to it or who are aware of the behavior. We at Bunts Tools Pvt. Ltd. believe that all employees are entitled to a working environment which respects their personal dignity and which is devoid of such objectionable conduct.

Definition:

Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- 1. Physical contact and advances; or
- 2. A demand or request for sexual favors
- 3. Making sexual colored remarks
- 4. Showing pornography
- 5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances if it occurs or is present in relation to or connected with any act or behavior of harassment may amount to sexual harassment:

- 1. Implied or explicit promise of preferential treatment in employment; or
- 2. Implied or explicit threat of detrimental treatment in employment; or
- 3. Implied or explicit threat about the present or future employment status; or
- 4. Interference with work or creating an intimidating or offensive or hostile work environment; or
- 5. Humiliating treatment likely to affect health or safety

A single incident can amount to sexual harassment if sufficiently serious.



Internal Complaints Committee:



As per law, every office at all locations of Bunts Tools Pvt. Ltd. shall appoint an Internal Complaints Committee to address the grievances/complaints of employees.

The Internal Complaints Committee which is nominated by the management shall consist of:

- a. A Presiding Officer who shall be a woman employee who is employed at a senior level.
- b. The Internal Complaints Committee shall not consist of less than 7 members from amongst our employees.
- c. At least one-half of the total members so nominated shall be women.
- d. There shall be a female representative from a social organization outside of the company maybe from an NGO, a lawyer etc.
- e. The Presiding Officer and every member of the Internal Complaints Committee shall hold office for not more than three years from the date of their nomination as may be specified by the employer.

Complaint Procedure:



We are absolutely determined to keep our offices and premises free of all form of sexual harassment and we take all necessary action to ensure a non-discriminatory work environment. To that end, we have a well-defined procedure for reporting instances of sexual harassment and handling such issues with the utmost confidentiality:

1. Any aggrieved employee may make in writing a complaint of sexual harassment at the workplace to the Internal Complaints Committee within a period of three months from the date of incident and in case of a series of incidents within a period of three months from the date of the last incident.

2. In case, such a complaint cannot be made in writing the Presiding Officer or any member of the Internal Complaints Committee shall render all reasonable assistance to the aggrieved for making the complaint in writing.

The Internal Complaints Committee may extend the time limit of three months if it is satisfied that the circumstances were such, which prevented the aggrieved from filing a complaint within the three months period. The reasons for extension should be recorded in writing.
 When the aggrieved person is unable to make a complaint on account of physical or mental incapacity or death the legal heir or such other person may make a complaint on their behalf.

Inquiry into Complaint:

On receipt of the written complaint, the Internal Complaint Committee will proceed to make an inquiry into the complaint or, as the case maybe forward the complaint to the police.

Both the parties during the course of the inquiry will be given an opportunity of being heard and a copy of the findings shall be made available to both parties enabling them to make representations against the findings before the committee

The Internal Complaint Committee shall have the following vested powers when trying a complaint:

- 1. Summoning and enforcing the attendance of any person and examining them
- 2. Requiring the discovery and production of documents
- 3. Any other matter which may be prescribed.

The inquiry shall be completed within a period of 90 days.

During the pendency of an inquiry, on written request made by the aggrieved person, the Internal Complaint Committee may recommend to the employer to:

- 1. Transfer the aggrieved person or the respondent to any other place; or
- 2. Grant leave to the aggrieved person up to a period of three months; or
- 3. Grant such other relief to the aggrieved person as may be prescribed.

The leave granted to the aggrieved would be in addition to the leave otherwise entitled to.

On completion of the inquiry, the Internal Complaints Committee shall provide a report of its findings within a period of ten days from the date of completion of the inquiry and the report will be made available to the concerned parties. If the Internal complaints committee arrives at a conclusion that the allegations against the respondent have not been proved, it shall recommend to the employer that no action is required to be taken.

However, if the Internal Complaints Committee arrives at a conclusion that the allegations against the respondent have been proved, it shall make a recommendation of cessation of employment of the respondent. The aggrieved may further want to pursue a legal course of action and



it shall be completely a personal decision. However, the organization shall extend any documentary evidences required for the person if the respondent is guilty.

The employer shall act upon the recommendation of the Internal Committee within sixty days of receipt.

Punishment for False & Malicious Complaints and False Evidence:

If the Internal Complaints Committee arrives at a conclusion that the allegations against the respondent is malicious or the aggrieved or any other person making the complaint has made the complaint knowing it to be false or if aggrieved or any other person has produced any forged or misleading document, it may recommend to the employer to take action against the person who has made the complaint. A mere inability to substantiate the complaint or provide adequate proof would not attract action against the complainant. The malicious intent of the complainant will have to be established after an inquiry, in accordance with the procedure, before any action is recommended. In case the Internal Complaint Committee comes to a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading documents, it may recommend to the employer of the witness to take appropriate action by means of fine, suspension, withholding of part or full increment and, in severe cases, termination of employment.



Confidentiality:

The contents of the complaint, the identity, and addresses of the aggrieved person, respondent and witnesses; any information relating conciliation, injury, proceedings, recommendations of the Internal Complaints Committee, action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner.

Grievance Redressal Policy

Objective:

The objective of the Grievance Resolution Policy is to provide a fair, equitable and productive work environment to all employees. This policy seeks to support the achievement of this goal by providing a transparent and consistent process for resolving grievances.

Scope:

The policy applies to every employee at all locations of Bunts Tools Pvt. Ltd.

GENERAL PRINCIPLES

We, at Bunts Tools Pvt. Ltd. are committed to address the key issues and be acceptable to all individuals or parties involved without ascribing blame, victimization or discrimination. Complainants will not suffer any disadvantage, victimization or discrimination as a result of raising a grievance, with minimum stress and maximum protection for all concerned.

It is the responsibility of every manager and employee to comply with this policy and to treat everyone with utmost dignity and respect. We also set forth that although this policy aims to resolve grievances, grievances of trivial or false natures shall not be tolerated and may result in disciplinary actions.

Guidelines:

1. A grievance is defined as a complaint against a serious hardship or partial behavior faced consistently by an employee

2. The employee shall have a right to raise a grievance in case it is a genuine complaint.

3. If a complaint is found to be false or made to create problems for fellow employees, serious actions shall be taken which may include termination of services.

4. The grievance should be first registered with the Head of the Department. In case the complaint is against the HOD or the HOD does not take any action on the grievance only then the Management and HR should be approached to.

5. The first attempt at Grievance Resolution should be through a open communication between the aggrieved, person of concern and a mediator.

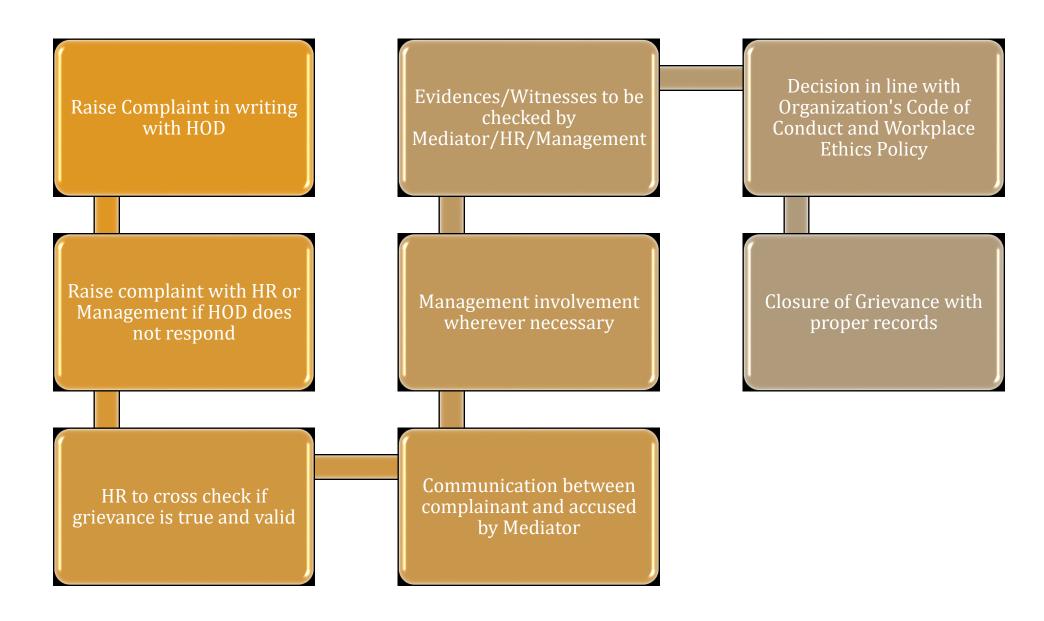
6. If the matter is not resolved through this step; only then the Management shall take charge of the situation and suggest further measures.

7. A thorough examination of any evidence or witness presented by both the parties should be done in an unbiased manner and both the parties should be given a right to make their point.

5. On examination of the evidences/witnesses and subsequent discussions, the Management shall arrive at a decision which is in line with the company's ethics and code of conduct.

6. It should be ensured that the entire procedure should not take more than a month to reach a conclusion. If for some reason there is a delay in the procedures, the reason and schedules for the same should be circulated to all concerned parties diligently.

7. The prime responsibility of driving these procedures lies with the HR department with support from the Management.



Employee Separation Policy

Objective:

The objective of this policy is to set forth procedures and guidelines to handle all aspects of employee separation. It is aimed at smooth separation of the employee and handover of the tasks to the person taking over. Another objective of the policy is to analyse reasons for separation and take corrective action on the root causes thus identified.

Scope:

This policy covers all employees of Bunts Tools Pvt. Ltd.

Responsibility & Accountability:

The Human Resource Department along with the Department Heads are responsible for smooth handovers and separations of employees in their respective functions.

Exit Types and Procedures:

1. Employee Initiated Separation (Resignation):

- In case the employee decides to separate on their own accord from the organization it is treated as a resignation.
- In case of a resignation; an email or a hand written letter of resignation is to be submitted by the employee to their respective reporting managers/supervisors.
- If an employee is on site for work or is on leave; their resignations shall be accepted only
 after (and from date of) returning to the office. Resignations sent from home/client place or any place outside office premises shall not
 be accepted and such cases shall be treated as absconding.
- The copy of the resignation letter is to be marked to the HR Department.



- A discussion has to be taken up with the management immediately on receipt of this letter by the immediate reporting manager/supervisor of the employee putting in the resignation.
- A revert email or remark on letter for acceptance is to be provided by the HOD/Reporting Manager and /or HR on the resignation.
- Prior to the employees last working day (as per notice period mentioned in appointment letter or discussed mutually between Management and employee); the exit formalities should be completed by the HR department in coordination with the immediate superior.
- The employee is expected to serve the entire notice period that has been mentioned in the appointment letter given at the time of joining.
- Employees are not eligible to avail of any leave during their notice period. For seamless work handover availability is important during this period
- Exercise duties and responsibilities assigned to you diligently during the notice period.
- Full and final will be initiated after authorisation of HOD on formal handover of work to respective manager / Supervisor.
- Any request for a waiver has to be discussed with the Management and approval has to be obtained in case of a waiver.
- The full and final amount should be settled only after clearances from respective departments like Administration, IT & Security, Finance & Accounts etc.
- A relieving letter, experience certificate and a notice period waiver letter (if required) should be provided to the employee and receipt acknowledgement should be taken from them.
- If an employee is leaving the organisation without proper handover and not complying with company's employee exit policy, in such case company may initiate Suitable legal action as violation of terms of employment.

2. Employer Initiated

In case an employment is being terminated from the employer side because of breach of code of conduct or non-performance; following procedure is to be followed:

Termination of an employee has to be a last resort and a regrettable decision for employees who are not able to perform as per required standards. The employee should be counselled and he should be provided transparent feedback as to why the employment is being terminated.

In case of a breach of code of conduct; exceptional/critical cases should be referred to the disciplinary committee with an appropriate composition of Management representatives and senior employees in the organization. In these cases, the employee may have to appear for an enquiry so as to provide him/her an opportunity for being heard in line with the laws of Natural Justice.

Termination on account of unauthorized absence or repeated absence shall be dealt appropriately as per rules for absconding cases. In absconding cases, the exit form should be filled by the Immediate superior and submitted to HR with the remark of absconding case.

After counselling the employee should be handed a termination letter along with severance pay (if applicable). In this case, no relieving letter and experience letter shall be given.

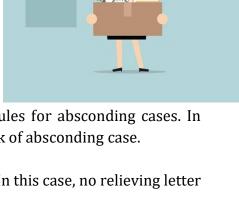
The notice period; if it is to be kept shall be discussed with employee and completed accordingly.

3. Retirement:

The retirement age for employees in Bunts Tools Pvt. Ltd. is 58 Years.

On attaining that age, the employee shall be relieved from duties with a relieving letter and a full and final settlement.

The HR should keep a tab on the upcoming retirements and start the handover process one month in advance to avoid any issues in work.





Bye!

Exit Interviews:

1. In case an employee resigns, it is mandatory to conduct an exit interview.

2. For the Manager grade and above, the Exit interview should be conducted by the HR head/Management. For employees below the manager grade, the HR may take the exit interviews.

3. All feedbacks – positive and negative shall be recorded with complete transparency and should be discussed with the Management for escalations or corrective actions wherever required.

4. For an employer-initiated separation, an exit interview is not necessary although other formalities mentioned should be completed.

Separation because of Death:

In the unfortunate case of demise of an employee, following procedure should be followed:

The date of death will be construed as the last date of employment. The date of death will be as specified on the death certificate.

The salary in this case will be computed for the last month up to and including the last date of employment and will be credited to the deceased employee's salary account or to (or his / her nominee account).

Eligibility for rehiring of previously separated employees:

Employees who leave Bunts Tools Pvt. Ltd. in good standing with proper notice may be considered for rehire. Former employees must follow the normal application and hiring processes and must meet all minimum qualifications and requirements of the position, including any required qualifying exam. Rehired employees will not retain previous tenure when calculating longevity, leave accruals or any other benefits, unless required by law.

Employees who are involuntarily terminated by Bunts Tools Pvt. Ltd. for cause or who resign in lieu of termination are ineligible for rehire. In addition, employees who resign without providing adequate notice or who abandon their job will not be considered for rehire.

General Guidelines:

- On receipt of intimation of resignation, the HR shall stop the release of the salary for current month (to be adjusted in full and final settlement).
- The HR shall immediately consolidate particulars on leave details, loans and advances, assets with the employee etc.
- An employee serving his/her notice period shall not be entitled for any subsequent salary increments o position promotions that would be applicable in retrospective effect.
- Calculation of full and final settlement should be done based on number of days of notice served, number of leave taken & leave adjustment recovery if any. The entire payment is done in the month following the exit month subject to recovery of mobile bill, meal voucher, Petty cash, Loan EMI, Company asset damages, etc.
- Full and Final Settlement should be done within 15 days of date of relieving.
- Under no circumstance should the dignity of the employee be compromised in the separation process.

Emergency policy

Purpose: - To render medical treatment to the injured quickly.

Employee's role in emergency Plan: -

Inform nearest available floor supervisor/ Department Head/ HR/ Plant Head.

Key Personnel To Contact in case of Emergency	Designation	Contact No.
Mr. Atul Patil	HR Manager	9657507783
Mr. Nitin Sahane	Department Head	9373753508
Mr. Satish Yadav	Plant Head	9823174594
Mr. Santosh Shetty	Director	9823275958



If not available, shout loudly to draw attention of other colleagues.

Do not overcrowd the place of emergency/ accident.

Role of HR: -

Routine

- 1. Provide training for emergencies to employees and create awareness of importance of proper emergency responses.
- 2. Keep copy of Emergency Action Plan on each floor. Provide employees with the written Emergency action plan to minimize confusion during an emergency.
- 3. Clearly communicate your employees who will be in charge during an emergency to minimize confusion.
- 4. Six monthly review emergency action plan with employees to make sure everyone knows what to do before, during and after an emergency. Conduct practice drills (as often as necessary) every six months to keep employees prepared.
- 5. After each drill gather management and employees to evaluate the effectiveness of the drill. Identify strengths and weaknesses of your plan and work to improve on it.

Training frequency

- Development of initial emergency procedure
- Hire new employees
- Revise/update emergency procedure

Management of trauma during Emergency / Accident

The first response is an essential part of the golden hour in an emergency case. This can be achieved by following a simple method and ensure that the patient is attended quickly, safely and effectively.

- 1. Assess the situation to determine whether an emergency exist, requiring activation of emergency procedures. At the scene of the trauma, prepare yourself to rush to help, take a moment to look around and survey the scene.
- 2. Check if it is safe to respond to the victim. There is no fire, leaking oil, machines running near the accident site, fallen electricity lines etc.
- 3. Immediately call for help and give an accurate location of the accident. Important Contact No's of external medical care agencies:-

Hospitals / Emergency Services	Contact No.s
Mayur Hospital	0253-2373006
Civil Hospital (In case of snake/ animal bite)	0253 2576106
Ambulance	9130922693 / 8975024760

- 4. While describing the scene make sure to include information about the number of victims, the presence of hazards to the responders. Share your phone number so that the rescue team can call you back for updates. Once help has arrived, the actions for stabilizing the patient and reaching the patient to the right hospital quickly will become easier.
- 5. Approaching the victim: once you know the place is safe and help is on the way, try to speak to the victim, if you get a coherent response, this would mean that the patient is conscious and has an intact airway.
- 6. Should the victim need resuscitation you may attempt to do CPR if you have been trained to do so.
- 7. If the patient is breathing and does not need CPR, open the clothing to look for any bleeding wound. Should you find one, use some sort of direct pressure with a thick pad or clothing on the wound to stop the bleeding, while attempting to stop bleeding would suggest one-use gloves, eye protection & a face mask for personal protection
- 8. Do not give anything to the patient to eat or drink. This is because when somebody is unconscious or semiconscious, giving the victim water or food may cause them to choke and further complicate the situation.
- 9. Watch out for Shock: Shock is something that would cause severe bleeding which would lead to a severe drop in blood pressure and lack of blood perfusion to the end organs. In case the patient appears to be pale, or breathes very fast or shows a faint pulse, suspect shock and make sure the patient is immediately rushed to the hospital.
- 10. In case you have to move the patient elsewhere from the accident spot, make sure to move the victim "like a log" that avoids bending the spine of the victim. Use a plank or solid support to carry the patient on it. If the spine is bent and you disrupt a fracture, it might lead to damage to the spinal cord and the victim might end up being completely paralyzed.
- 11. Reassure the victim to keep calm as panic will increase the heart rate which could further increase the bleeding. Thus, it is essential for the victim to keep calm until the help arrives.
- 12. Stay by the side of the victim, call for help and constantly keep giving updates to the paramedical staff or nurses and they will be better prepared to attend the victim.

13. In the event of emergency keep important personal information ready to access. This includes their home contact numbers, names and contact numbers of their next of kin and medical information.

Make the optimal usage of the Golden Hour, ensuring the victim reaches the hospital safely and swiftly for better clinical intervention.

Role of Plant Head: -

- Inform HR Manager & rush to the spot for assessment of the situation.
- Assess & keep contact with Director.
- Monitor progress of emergency action.
- Call Ambulance/ Hospital as necessary.

Pandemic Preparedness and Response Policy

Objective:

The objective of this policy is to set down guidelines while responding to a Pandemic or similar situation.

- 1. It would be mandatory to sign the self-declaration form on the first day with details of your Stay during the lockdown period.
- 2. It would be mandatory for all employees to wear mask while working and travelling
- 3. Visitors / suppliers / service providers will not be allowed into the premises without the masks.

4. It would be mandatory to go thru 100% thermal screening at entry every day.

5. 2 Reusable cloth masks would be provided by company which needs to be washed everyday with detergent and reused.

6. It would be mandatory to sanitize hands at time of entry and exit from factory.

7. Distance of minimum 1 meter to be maintained on shop floor between two operators.

8. Avoid face to face communication and practice social distancing during meetings.

9. Washing of hands before and post lunch would be mandatory. No sharing of food.

10. Maintain social distancing at canteen during lunch as explained by HR.

11. Lunch timings will be staggered to ensure minimum employees and social distancing.

12. Social distancing to be maintained in the changing room and water dispending locations.

13. Shifts will be staggered to avoid overlapping of incoming & exiting employees.

14. Spitting within the premises is banned and disciplinary action would be initiated immediately.

15. Report to HR if anyone found with symptoms of COVID-19 immediately.

The company expects Zero deviation on the above policy to ensure safety of each of the employees & society in Nasik. These guidelines are in line with the directives laid out by Government of India.

Disciplinary action would be initiated against any employee defaulting on the above policy including termination from company.

The HR Policies manual is intended to make all our team members aware of each policy and its associated rules and regulations. The manual is subject to changes from time to time based on management discretion.

We expect all members of Bunts Tools Pvt. Ltd. to follow all policies laid down in this manual.

For any queries related to this manual employees can get in touch with HR at – <u>hr@bunts.in</u>

Bunts Tools Pvt. Ltd. looks forward to a wonderful journey of growth and prosperity with you!!!

Thank You!!!

