

TRIVENI ENGINEERING & INDUSTRIES LIMITED
CORPORATE HR

**SUBJECT: EMPLOYMENT OF RELATIVES AND BUSINESS
DEALINGS OF RELATIVES WITH THE COMPANY**

COVERAGE: All Business units of the Company.

APPLICABILITY: All Employees:

- a. All Officers (EC and Non-EC)
- b. All Staff and Workmen including Wage Board employees
- c. Trainees / Apprentices
- d. Engagement of Staff on Contractual Deployments

PREAMBLE:

The Company believes in the transparent and fair management of its business. Due to potential for perceived or actual conflicts arising out of any favoritism, personal conflicts or conflict of interest from outside or within the work environment, which can be carried into the daily working relationship, the Company has framed a policy on **'Employment of Relatives and Business Dealings of Relatives with the Company'**.

The policy is in supersession to all earlier existing schemes/policies in this regard.

The purpose of this Policy is to avoid a situation for employees where favoritism or conflict of interest may arise relating to employment or business dealings.

POLICY:

1. Employment of Relatives

- I. The Definition of relative for this purpose shall be as per **Clause 3**, given below.
- II. This policy prohibits the employment consideration of any relative in the company.
- III. No relative of the employees can be appointed except with prior special written approval from CMD/VCMD.
- IV. The employees are required to give a disclosure of relatives working in the Company and Group Company (i.e. TEIL and /TTL) immediately on issuance of this Office Order for obtaining required approval from CMD/VCMD.



- V. The declaration from the employee will cover all relatives working in the Company and Group Company irrespective of the Level i.e. officer, supervisor or worker or the Unit where such a relative is working.
- VI. At the time of appointment, every new employee will have to give declaration regarding employment of his relative working in the Company and Group Company at all levels.
- VII. In case of fresh appointment, in exceptional cases, where it is considered essential to recruit a relative of the employee, the matter will be referred to CMD/ VCMD for their consideration.
- CMD/ VCMD will take a decision on such appointment based on the need, situation, strategic importance of the position, importance of candidate's skills & its rarity and the risk whether favoritism may arise due to the existing relationship.
- Based on the approval, Corporate HR will go ahead with appointment/give necessary instructions to Unit HR for the way forward.
- VIII. Wherever approval of any such employment has been obtained, Corporate HR will ensure that:
- The relative will not be employed in the same functional area of the employee.
 - Relative will not be employed in a direct or indirect supervisory chain of command in which one has influence over a relative's employment, related to decisions or recommendations in matters such as assessment of performance, salary, career growth, transfers, promotion and other disciplinary matters.
- IX. In case of any recommendation for confirmation / absorption of any Trainee / Contractual staff already engaged on Training / learning projects against vacancy, Corp HR will evaluate such cases separately based on the merit / conduct / performance of the said case before it is taken forward for Management consideration.

2. Business Dealings by Relatives of Employee:

- I. The definition of relative for this purpose shall be as per **Clause 3**, given below.
- II. No relative of the employees can be engaged on business dealing except with prior special written approval from CMD/VCMD.



- III. The policy prohibits relatives of an employee to transact with any business dealings with the Company either in the same Unit or any other Unit and the Group Company.
- IV. All employees are required to give declaration regarding business dealings of their relatives immediately on issuance of this Office Order.
- V. At the time of appointment, the new employee will give declaration regarding his relatives having business dealings with the Company/ Group Company. The matter will then be referred to CMD/VCMD for their approval/ final decision.
- VI. Business dealings for this purpose would mean all dealings with outside parties / vendors relating to labor supply, work contract, job contract, providing any type of services, providing any means of transport engaged for carrying out company related activities & engaging vehicle(s) directly or through someone else in the company, supply of goods etc.

3. Definition of Relatives:

A person, supplier, vendor who is in a position to influence or is capable of being influenced by the concerned employee, will be deemed to be a Relative. The influence could be in the form of preferred treatment, pecuniary benefits or just a favour.

The word relatives will include, but not be limited to:

- Parents of employee & his Spouse, Siblings of employee & his spouse and their immediate families, children including the child's spouse & his/her immediate family, grandparent, grandchild, uncle and aunt of the employee or employee's spouse.
- Relatives up to 2nd cousin of Self, Spouse and married children: brother, sister, uncle & aunt (paternal & maternal) and their children.
- Relatives also include "step" relationships such as stepchild and stepparent.

4. Responsibilities:

The purpose of these policy points arises out of the **Company's responsibility** to ensure that employees are provided with effective procedures in managing conflict of interest involving their relatives employed in the Organization.



In turn, all **employees will be responsible** for:

- I. Knowing, understanding, and complying with the contents of the above explained policy points.
- II. Disclosures of relatives and vendors, as and when such relationships are formed, to their respective Unit HR.
- III. Promptly notifying the respective Unit/Corporate HR when an employee becomes or will become related to another employee in the Organization or comes into the direct/indirect supervisory chain of command of a relative as defined herein above – which may be consequent to promotion, transfer, role change, recruitment, marriage etc.
- IV. Confidentially reporting violations of these Guidelines, if any to Corporate HR through written communication.

Unit HR is responsible for:

- I. Obtaining the disclosure as per in **Annexure I** from all employees immediately after the policy is released.
- II. Disclosure, once obtained will be maintained by the Unit HR and a copy of the same will be filed in the Personal File of each employee (wherever the files are being maintained by Corporate HR, Unit HR will send a copy of the same to the Corporate HR).
- III. Sending a summary of all the disclosures to Corporate HR in **Annexure II**.
- IV. Updating Corporate HR on a regular basis about the changes, if any /new disclosures obtained.

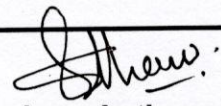
5. Non-Compliance:

Employees who violate these guidelines and obligations will be subjected to disciplinary action, as may be deemed fit by the Management.

EFFECTIVE DATE: The above Policy will come into force with immediate effect.

OO: HR/2019/02

Date: 25th November, 2019



Sanjeev Asthana

VICEPRESIDENT (HR)