

EMPLOYEE DUE DILIGENCE AND BACKGROUND VERIFICATION

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EMPLOYEE DUE DILIGENCE AND BACKGROUND VERIFICATION PROCEDURES

1. PURPOSE AND SCOPE

The purpose of this document is to lay down standards to be followed by Madhucon Projects Limited and its subsidiaries/affiliates (Company) for conducting any due diligence on employees before onboarding (hereinafter referred to as **DD Procedures**). The Company shall undertake DD Procedures with respect to certain employees, whose roles and responsibilities are sensitive to the compliance. Such employees (**Relevant Employees**) ~~may~~ shall include the following, unless an exception is approved in writing by the relevant HR manager and Ethics and Compliance Officer:

- (a) Employees engaged in interactions with government or public departments for varied purposes, including but not limited to licences, permits, approvals and registrations.
- (b) Employees in charge of maintaining and implementing the Code in the Company.
- (c) Employees in finance, legal, sales and marketing functions.
- (d) Employees in procurement (whether administrative or liquor) functions.

The Company may further identify any other employees which may be considered Relevant Employees for the purpose of DD Procedures.

2. GUIDELINES FOR BACKGROUND VERIFICATION FOR RELEVANT EMPLOYEES

The Company shall undertake compulsory background verification procedures of any person proposed to be enrolled as an employee in the Company. The background verification procedures shall include and not be limited to the verification of academic qualifications, previous jobs, KYC records, any previous instances of misconduct, political exposure, pending or completed litigation and reference feedbacks.

Apart from the general background verification, the Company shall undertake additional DD Procedures with respect to the Relevant Employees. The DD Procedures shall include:

- (a) Obtaining confirmation from the Relevant Employees with respect to any ongoing or past litigations against them.
- (b) Obtaining confirmation from the Relevant Employees with respect to their involvement in any misconduct in relation to violation of any laws in force, including bribery and corruption, money laundering and criminal offences.
- (c) Independent verification of the responses provided by the Relevant Employees in (a) and (b) above by conducting open desktop searches and searches on the court records of relevant jurisdictions.
- (d) Independent verification to ensure that Relevant Employees are not politically exposed persons (PEP) and do not have a criminal background.

In the event that any of the background verification or DD Procedures result in adverse results for an employee, the Company should obtain the details thereof from the employee. Based on

risk-assessed of such results, the Company shall decide whether to proceed with the onboarding of the employee or not, after consulting with the Ethics and Compliance Officer and documenting the consultation and justification for the decision.

The respective HR manager shall perform the aforesaid functions and seek guidance from the Ethics and Compliance Officer. The Ethics and Compliance Officer shall periodically review the status of compliance with the DD Procedures.

3. **GUIDELINES FOR BACKGROUND VERIFICATION FOR RELEVANT EMPLOYEES AFTER ONBOARDING**

- (a) The Company shall ensure that an annual declaration is taken from all employees including Relevant Employees which shall include and not be limited to any pending or completed litigation, summons or orders passed by any court, political exposure, their involvement in any misconduct in relation to violation of any laws in force, including bribery and corruption, money laundering and criminal offences etc.

ANNEXURE I

EMPLOYEE ONBOARDING FORM

Particulars	Description
Name of Employee	
Employee Code	
Designation	
Mobile Number	
E-mail Address	

Employee Details	
Particulars	Description
Scope of work	
Has the employee received orders or summons from the any court in India. if yes, please provide details	
Has the employee been engaged in any fraudulent, unethical, illegal or inappropriate activity (ies) in the past.	
Has background check (including desktop searches) been conducted on the employee?	Yes [] No []
Does the employee have any pending or past litigation against them under, but not limited to, Prevention of Corruption Act, Indian Penal Code, Prevention	

of Money Laundering Act etc	
Is the employee a politically exposed person?	Yes [] No []
Have references from former employers been collected and verified?	Yes [] No []

By signing below, I certify that I have performed such procedures and inquiries as necessary to ensure that the answers provided in this document are accurate and complete to the best of my knowledge and belief.

Prepared by _____ Reviewed by _____

(To be signed by Ethics and Compliance Officer)

Name:

Designation:

Date: