
Policy Manual

DC Transport Management Pvt. Ltd.

Effective From:
Approved by: Director

Table of Contents

1. Introduction	4
1.1 Policy Statement	4
1.2 Mission Statement	4
1.3 Purpose	4
1.4 Title	4
1.5 Commencement	4
1.6 Applicability, Amendment and Interpretation	4
1.7 Details arising out of the administration, application or implementation	5
1.8 Definitions	5
1.9 Repeal	6
2. Common Duties and Obligations of All Employees (Code of Conduct)	6
3. Anti-Bribery & Corruption (ABC) Policy	8
3.1 Policy statement	8
3.2 Definition	10
3.3 Scope	10
3.4 Gifts, Invitation & Hospitality	10
3.5 Facilitation Payments & Kickbacks	11
3.6 Your Responsibilities	11
3.7 Protection	12
3.8 Governance	12
3.9 Monitoring and Review	12
4. Whistle Blower Policy	14
4.1 Preface	14
4.2 Policy	14
4.3 Policy Objectives	14
4.4 Scope of the Policy	15
4.5 Definitions	15
4.6 Eligibility	16
4.7 Procedure	16

4.8	Investigation	18
4.9	Audi Committee.....	18
4.10	Reporting	19
4.11	Confidentiality	19
4.12	Protection	19
4.13	Disqualification	20
4.14	Interpretation	20
4.15	Access to the Chairman of Audit Committee	20
4.16	Communication	21
4.17	Administration & Review of Policy	21
4.18	Amendment	21
5	Disciplinary Policy	21
5.1	Meaning of Disciplinary Action	21
5.2	Objectives of Disciplinary Action	21
5.3	Commencements of Disciplinary Proceedings	22
5.4	Conclusion of Disciplinary Proceedings	22
5.5	Conclusion of Disciplinary Proceedings	22
5.6	Misconducts/ Offences.....	22
5.7	Punishments	24
5.8	Consideration for awarding punishment/s	24
5.9	Procedure for imposing Punishment	25
5.10	Essential requirements of an inquiry.....	25
5.11	Disciplinary Authority & Appellate Authority	26
5.12	Initiation of Disciplinary Proceedings	26
5.13	Suspension and Subsistence Allowance	26
5.14	Inquiry Officer	26
5.15	Imposition of Punishment.....	26
5.16	Appeal	27
5.17	Serving of Charge sheet and other communications	27
6	Recruitment & Selection Policy	28

6.1	Policy Statement.....	28
6.2	Objectives	28
7	Environmental Sustainability Policy	31
7.1	Introduction	31
7.2	Purpose	31
7.3	Initiatives Towards Environmental Sustainability.....	31
7.4	Responsibilities	32
8	Employee Health & Safety Policy	32
8.1	Purpose	33
8.2	Objectives	33
8.3	Initiatives Towards H&S	33
8.4	H&S Review System.....	33

1. Introduction

1.1 Policy Statement

DC Transport Management Pvt. Ltd. wants to be an equal opportunity employer, offering meaningful jobs that stand out for giving and rewarding responsibility, a safe and challenging work environment and fair compensation, in line with local practice.

1.2 Mission Statement

DC Transport Management Pvt. Ltd. is committed to delivering safe & secure journey to our passengers by offering better quality vehicles, professional & trained drivers and service excellence in every activity and using state of the art processes and technology thus ensuring mutual trust and accountability with all stakeholders.

1.3 Purpose

For the purpose of effective management of the company's affairs and for affording the Company's employees an opportunity to function and grow in a healthy and congenial atmosphere, the Company follows a set of rules and has developed certain values, practices and conventions. These values, practices and conventions are in line with the laws of the land and with Company policies.

The Human Resource Management Procedures and Policies Manual aims at defining policies and procedures. It will also serve as a ready reference for the employee of the company and assist them in their functioning.

1.4 Title

This manual may be called "Human Resource Manual". For the sake of brevity and convenience, it is hereafter referred to as "**HRM**".

1.5 Commencement

The HRM as amended from time to time shall come into force on **first day of June 2014** and will supersede the previous manual.

1.6 Applicability, Amendment and Interpretation

- 1.6.1 HRM shall apply to all employees of the Company unless otherwise provided by the terms and conditions of any employee's agreement, contract or letter of appointment.

1.6.2 The Company may from time to time amend, alter, delete or add to all or any of the provisions contained in the HRM.

1.6.3 If any question arises as to the application and /or interpretation of any provision/s contained in the HRM, it shall be referred to the Managing Director / Delegated Authority whose decision shall be final and binding on the employee/s concerned.

1.7 Details arising out of the administration, application or implementation

HRM is intended to lay down general principles governing employment in the company, the conduct of its employees and relations between the Company and its employees. All details not provided in the HRM but arising out of administration, application or implementation of the provisions contained in the HRM shall be determined and / or prescribed by the Managing director / Delegated Authority, as the case may be, provided that anything so determined and / or prescribed shall not contravene any provision/s of this manual.

1.8 Definitions

In the HRM, unless anything contrary or repugnant to the subject or the context:

1.8.1 Board means the Board of Directors of the company.

1.8.2 Committee means a body of one or more individuals and assigned to a particular task under a given set of conditions by the board or the Managing Director.

1.8.3 Company means DC Transport Management Pvt. Ltd.

1.8.4 Confirmed Employee means an employee who has been confirmed in the employment of the company by an order in writing passed by the Managing Director or Delegated Authority

1.8.5 Core Business means all aspects of transport and related activities of the company

1.8.6 Day means a period of 24 hours beginning at midnight: provided that in the case of any employee whose working hours extend beyond midnight, day means a period of 24 hours from such time that he completes his shift, irrespective of midnight;

1.8.7 Delegated Authority means the Managing Director or any other individual authorized by the Board, as the case may be to take action or perform any function/s under the provisions of this manual;

- 1.8.8 Company Head means an employee appointed as such by the Managing Director or the senior most appointment in the unit/department or any other appointment as may be determined by the Managing Director.
- 1.8.9 Employee means an employee of the company to whom the provisions of this manual apply
- 1.8.10 Month means a period of 30 consecutive days
- 1.8.11 Calendar Month means a month as per the English calendar
- 1.8.12 Week means a period of seven days beginning the midnight of Saturday
- 1.8.13 Working day means the office timings for employees at the Corporate Office, Regional Office and respective shift timings for all other employees
- 1.8.14 Year means a period of twelve consecutive months as per the English calendar
- 1.8.15 Calendar year means a year beginning with the 1st day of January and ending with the 31st day of December
- 1.8.16 Financial Year means a year beginning with the 1st day of April and ending with the 31st day of March
- 1.8.17 Male shall include female and singular shall include plural
- 1.8.18 Gross Salary means the total of Basic, VDA, HRA and all other Allowance
- 1.8.19 Total salary (CTC) means complete salary inclusive of Gross salary, allowance, and social security benefits (PF/ESIC/Medicaid/Gratuity/Bonus) & other perquisites payable to the staff.

1.9 Repeal

All provisions practices and conventions and the like governing any of the matters dealt with in the HRM, which are not expressly saved or reenacted by this manual are hereby repealed: Provided that this repeal shall not affect or invalidate any action taken or decision made before the commencement of the HRM.

2. Common Duties and Obligations of All Employees (Code of Conduct)

- 2.1 No employee of the company shall directly or indirectly engage in any employment, trade, business or profession falling outside the scope of his employment in the Company either for a fee or for charity or as advisor or in any other capacity, without the prior written permission of the Managing Director / delegated authority.
- 2.2 Every employee shall faithfully and diligently serve the company at such office, station, post or position to which he may from time to time be appointed, posted, transferred and shall in all respects faithfully and diligently observe all the provisions of this manual and rules, orders, directions or instructions in force in the company or from time to

time issued by the company or by any person placed in authority over him in respect of, more in relation to the work, duties, functions, powers authority from time to time assigned or entrusted to him.

- 2.3 Every employee shall take all possible steps to ensure and protect the interests of the company and discharge his duties with utmost integrity, honesty, devotion and diligence.
- 2.4 Every employee will observe strict confidentiality with regard to all affairs of the company, all dealings and transactions of the company with its bankers or with the company's customers and others. An employee shall not divulge or disclose any secret or confidential information entrusted to him or arising or coming to his knowledge in the course of his duties or otherwise in relation to the business of the company or its customers or others having business or dealings with the company
- 2.5 Every employee shall be responsible for the due safety of and be held accountable for and shall on demand forthwith deliver, to the company all cash, cheques, documents, letters, files and any things and articles of any kind and articles of any description received by him (or by any person or persons with his consent express or implied or at his convenience) from the company or on behalf of the company from any person having business or dealings with the company
- 2.6 Integrity and Honesty of our employees is an important factor for continuous business operation of our company. Transport is a business of highly trust & safety. You will therefore ensure that under no circumstances you will pick up, remove, steal any items partly or fully and take them outside the vehicle unless so authorized in writing by designated company officials, or authorized personnel of customer.
- 2.7 Any criminal proceeding or police investigation against you shall be immediately intimated to the management. Such proceeding or investigation may entail suspension or dismissal from service even though there is no conviction or investigation pursued by police.
- 2.8 While discharging his duties / work of the company efficiently and also purposefully, every employee must abide by and/or adhere to the laws, the rules and regulations as may be formulated by the Government of India and its agencies or the concerned State Government and its agencies, or local authority, financial institution (s), or the company's clients, that govern the company's day-to-day business. If, at any time, any employee acts contrary to the spirit or the letter of any law or rule and regulation applicable to the company, he shall be personally held responsible for the consequences that may arise there from, and shall indemnify the company against any loss / in damage incurred due to such acts of omission / commission on his part.
- 2.9 The transport with safety, security and proper handling of the customers

- belonging's is a key element of the service the company provides to its customers; all employees will ensure that there is no loss, pilferage of, or damage to, any customers and their belonging's.
- 2.10 In the event of a reported loss or damage to the customer's belonging's or any of the company's property, all employees shall render utmost cooperation as regards police investigation or assessment of the loss by underwriters
 - 2.11 Every employee shall be liable to make good any loss or damage sustained by the company in consequence of any negligence on his part in the performance of his duties.
 - 2.12 Every employee shall show courtesy towards other employees of the company and towards all others having dealings with the company
 - 2.13 No employee shall use violence or abusive language against any other employee of the company or others having dealings with the company.
 - 2.14 Every employee shall conduct himself in a manner so as to increase the business of the company and enhance the prestige and reputation of the company.
 - 2.15 No employee shall directly or indirectly accept any bribe or any financial advantage for any work done by him in the course of his duties in the company or during deputation to any station.
 - 2.16 All employees will report for work only in neat and clean uniform, provided by the company/clothing pending issuance of the uniform.
 - 2.17 All employees should maintain good health and personal hygiene. Every employee will undergo periodical medical examination by the doctor to assess your job fitness as and when required by the company.
 - 2.18 Every employee shall report for work and commence his work at the right time and shift according to the roster assigned
 - 2.19 The exercise of duties while under the influence of psychoactive substances is prohibited and if not followed then the employee(s) shall bear the consequences for such misconduct as defined in the Disciplinary Procedure of the company.
 - 2.20 No employee shall sleep or doze while on duty.
 - 2.21 Any other rules laid down by the company from time to time.

3. Anti-Bribery & Corruption (ABC) Policy

3.1 Policy statement

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by local and national laws.

3.2 Definition

“Agent”: Any individual acting as an agent, paid by the company, acting on the company’s behalf in negotiating with Third Parties.

“Bribery” / “Corruption”: Bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favor, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through Third Parties.

“Company”: All subsidiaries and affiliated companies.

“Conflict of Interest”: Occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

“Donation”: A Donation is a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organizations that serve business interests are not necessarily considered Donations.

“Employee”: For the purposes of this policy this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded/support staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or joint ventures or their employees, wherever they are located.

“Facilitation Payments”: A form of Bribery in which small payments are made with the purpose of expediting or facilitating the performance by a Public Official of a routine governmental action and not to obtain or retain business or any other undue advantage. Facilitation payments are typically demanded by low level and low-income Public Officials in exchange for providing services to which one is legally entitled without such payments.

“Gifts, Invitations & Hospitality”: Invitations given or received to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.

“Intermediary”: Includes but is not limited to Agents, distributors, consultants, sales representatives, implementation partners, sales partners.

“Kickback”: A bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.

“Public Official”: Officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

“Sponsorship”: Sponsorship is about partnering with external organizations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.

“Third Party”: Any individual or organization you come into contact with during the course of your work for us. This includes actual and potential customers, suppliers, business contacts, Intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.

3.3 Scope

3.3.1 This policy applies to all Employees and relevant Third Parties of the Company and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

3.3.2 This policy applies in all countries or territories where the Company operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. However, if this policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

3.4 Gifts, Invitation & Hospitality

3.4.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from Third Parties.

3.4.2 You are prohibited from accepting a gift or giving a gift to a third party in the following situations:

3.4.2.1 It is made with the intention of influencing a Third Party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits;

3.4.2.2 It is given in your name and not in the name of the Company;

3.4.2.3 It includes cash or a cash equivalent (such as gift certificates or vouchers);

3.4.2.4 It is of an inappropriate type and value and given at an inappropriate time (e.g. during a tender process); and

3.4.2.5 It is given secretly and not openly.

3.4.3 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

3.5 Facilitation Payments & Kickbacks

3.5.1 In many jurisdictions, making Facilitation Payments is illegal. We do not make, and will not accept, Facilitation Payments or Kickbacks of any kind anywhere in the world.

3.5.2 Where the facilitation payment is being extorted or you are being coerced to pay it and your safety or liberty is under threat or you feel you have no alternative but to pay for personal or family peace of mind, then pay the Facilitation Payment and report this to your line manager as soon as possible.

3.6 Your Responsibilities

3.6.1 It is not acceptable for you (or someone on your behalf) to:

- 3.6.1.1 Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- 3.6.1.2 Give, promise to give, or offer, a payment, gift or hospitality to a Public Official or Third Party to 'facilitate' or expedite a routine procedure;
- 3.6.1.3 Accept payment from a Third Party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- 3.6.1.4 Accept a gift or hospitality from a Third Party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- 3.6.1.5 Threaten or retaliate against another Employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- 3.6.1.6 Engage in any activity that might lead to a breach of this policy or perceived breach of this policy.
- 3.6.1.7 It is your responsibility to ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with Third Parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book'.
- 3.6.1.8 You must declare and keep a written record of all Gifts, Invitations & Hospitality according to Company practice accepted or offered, which will be subject to managerial review.
- 3.6.1.9 You must ensure all expense claims relating to Gifts, Invitations & Hospitality or expenses incurred to Third Parties are submitted in accordance with the Company's expenses policy and specifically record the reason for the expenditure.
- 3.6.1.10 The prevention, detection and reporting of any form of Bribery & Corruption are the responsibility of all Employees. You must notify [X - E.G. LINE MANAGER, HEAD OF LEGAL] as soon as possible if you are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

- 3.6.1.11 All Employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.6.1.12 Any Employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- 3.6.1.13 His policy should be read in conjunction with the Company's Gifts, Invitations & Hospitality policy, Conflicts of Interest policy and Code of Ethics.
- 3.6.1.14 Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting mechanisms.

FURTHER "RED FLAGS" THAT MAY INDICATE BRIBERY OR CORRUPTION ARE SET OUT IN APPENDIX 1.

3.7 Protection

Employees who refuse to take part in bribery or corruption, or report in good faith under this policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment/retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

3.8 Governance

3.8.1 The board of directors or any senior official delegated, has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

3.8.2 HR Head has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it. This training shall also be given to Intermediaries.

3.9 Monitoring and Review

3.9.1 The Company will establish and put in place appropriate performance measures and reporting systems to monitor performance against metrics and compliance with the relevant policies, procedures and controls.

3.9.2 Managing Director will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

3.9.3 Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective. HR Head will report to the Board of Directors at least annually on the application of this policy.

APPENDIX 1

"RED FLAGS"

The following is a list of possible red flags that may arise during the course of your work for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to [X E.G. LINE MANAGER, HEAD OF LEGAL]

- (a) you become aware that a Third Party engages in, or has been accused of engaging in, improper business practices;
- (b) if the Third Party refuses to divulge adequate information during due diligence procedure;
- (c) you learn that a Third Party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign Public Officials;
- (d) a Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- (e) a Third-Party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (f) a Third Party requests that payment is made to a country or geographic location different from where the Third Party resides or conducts business;
- (g) a Third Party requests an unexpected additional fee or commission to 'facilitate' a service;
- (h) a Third Party demands lavish Gifts, Invitations or Hospitality before commencing or continuing contractual negotiations or provision of services;
- (i) a Third Party requests that a payment is made to 'overlook' potential legal violations;
- (j) a Third Party requests that you provide employment or some other advantage to a friend or relative;
- (k) a Third Party requests that you make a political contribution or donation to the party or charity of their choice before agreeing to undertake a business relationship with the Company
- (l) you receive an invoice from a Third Party that appears to be non-standard or customized;
- (m) a Third Party refuses to put terms agreed in writing;

- (n) you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (o) a Third Party requests or requires the use of an Agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- (p) you are offered an unusually generous gift or offered lavish hospitality by a Third Party.
- (q) Customer is paying the high amount tips to driver and they found accepting it.
- (r) Driver found going to location which is not in the log book, for his own sake of benefits.
- (s) Driver found stealing fuel of the company and selling it out in the market

And so on.

4. Whistle Blower Policy

4.1 Preface

Section 177 of the Companies Act, 2013 and Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014 requires every listed company, companies which accept deposits from the public and companies which have borrowed money from banks and public financial institutions in excess of fifty crore rupees to establish a vigil mechanism for the directors and employees to report genuine concerns or grievances about unethical behavior, actual or suspected fraud or violation of the company's Code of Conduct or Ethics Policy. Such a vigil mechanism shall provide for adequate safeguards against victimization of directors and employees who avail of such mechanism and also make provisions for direct access to the Chairperson of Audit Committee in exceptional cases

4.2 Policy

In compliance of the above requirements, DC Transport Management Service Pvt. Ltd., has established a Vigil (Whistle Blower) Mechanism and formulated a Policy in order to provide a framework for responsible and secure vigil mechanism/whistle blowing.

4.3 Policy Objectives

The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, the Company encourages its employees who have concerns about suspected misconduct to come forward and express these concerns without fear of punishment or unfair treatment. A Vigil Mechanism/Whistle Blower Policy provides a channel to the employees and Directors to report to the management concerns about unethical behavior, actual or suspected fraud.

4.4 Scope of the Policy

- 4.4.1 This Policy intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company involving:
- 4.4.1.1 Misuse or abuse of authority
 - 4.4.1.2 Breach of Company's code of conduct
 - 4.4.1.3 Misuse or abuse of authority
 - 4.4.1.4 Breach of Company's code of conduct
 - 4.4.1.5 Breach of terms and conditions of employment and rules thereof
 - 4.4.1.6 Gross or Willful negligence causing substantial and specific danger to health, safety and environment
 - 4.4.1.7 Manipulation of company data/records
 - 4.4.1.8 Intentional financial irregularities, including fraud, or suspected fraud
 - 4.4.1.9 Pilferation of confidential/propriety information
 - 4.4.1.10 Deliberate violation of law/regulation
 - 4.4.1.11 Gross wastage/misappropriation of company funds/assets
- 4.4.2 This policy neither releases employees from their duty of confidentiality in the course of their work, nor can it be used as a route for raising malicious or unfounded allegations or a grievance about a personal situation.

4.5 Definitions

- 4.5.1 **"Audit Committee"** means the Audit Committee constituted by the Board of Directors of the Company in accordance with Section 292A / Section 177 of the Companies Act, 1956/ Companies Act 2013.
- 4.5.2 **"Company"** means DC Transport Management Service Pvt. Ltd.
- 4.5.3 **"Code"** mean Code of Conduct for Directors and Senior Management Personnel adopted by DC Transport Management Service Pvt. Ltd.
- 4.5.4 **"Employee"** means all the present employees and whole-time directors of the Company.
- 4.5.5 **"Ethics Officer"** means an officer of the company nominated by the Company to receive protected disclosure from Whistle blowers and to conduct detailed investigation under this policy, maintain record hereof, placing the same before the Audit Committee for its disposal and informing the Whistle blower the results thereof.
- 4.5.6 **"Protected Disclosure"** means a concern raised by a person or group of persons of the Company through a written communication and made in good faith which discloses or demonstrates factual information about an unethical or improper activity.

4.5.7 **"Subject"** means a person or group of persons against or in relation to whom a Protected Disclosure is made or evidence gathered during the course of an investigation.

4.5.8 **"Whistle Blower"** means employee person or group of persons who make a Protected Disclosure under this Policy.

4.6 Eligibility

All the directors and employees of the Company are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company.

4.7 Procedure:

4.7.1 All Protected Disclosures should be reported in writing by the Whistle Blower as soon as possible, not later than 30 days after he/she becomes aware of the same and should either be typed or written in a legible handwriting in English.

4.7.2 The Protected Disclosure should be submitted under a covering letter signed by the Whistle Blower in a closed and secured envelope and should be super scribed as "Protected disclosure under the Whistle Blower policy" or sent through email with the subject "Protected disclosure under the Whistle Blower policy". If the complaint is not super scribed and closed as mentioned above, the protected disclosure will be dealt with as if it is a normal disclosure.

4.7.3 All Protected Disclosures should be addressed to the Ethics Officer of the Company or to the Chairman of the Audit Committee in exceptional cases. Protected Disclosure against the Ethics Officer should be addressed to the Chairman of the Company and the Protected Disclosure against the Chairman of the Company should be addressed to the Chairman of the Audit Committee. The contact details of Ethics Officer, Chairman of the Company and Chairman of the Audit Committee are as under:

1. Name & Address of Ethics Officer

Name :
Designation :
Address : Company address will do
Email id :

2. Name & Address of Director of the Company

Name :
 Designation :
 Address : Company address will do
 Email id :

3. Name & Address of Chairman of Audit Committee

Name :
 Designation :
 Address : Company address will do
 Email id :

- 4.7.4 The Company may appoint additional Ethics Officer or Deputy Ethics officer to assess the Ethics Officer(s) in the procedure.
- 4.7.5 In order to protect the identity of the whistle Blower, the Ethics officer will not issue any acknowledgement to the whistle Blower and they are advised not to write their name / address on the envelope or enter into any further correspondence with the Ethics officer
- 4.7.6 Anonymous / Pseudonymous disclosure shall not be entertained by the Ethics officer
- 4.7.7 On receipt of the protected disclosure the Ethics officer shall detach the covering letter bearing the identity of the Whistle Blower and process only the Protected Disclosure. The record will include:
 - 4.7.7.1 Brief facts;
 - 4.7.7.1.1 Whether the same Protected Disclosure was raised previously by anyone, and if so, the outcome thereof;
 - 4.7.7.1.2 Whether the same Protected Disclosure was raised previously on the same subject;
 - 4.7.7.1.3 Details of actions taken by Ethics officer/ Director / Chairman of ethical committee for processing the complaint
 - 4.7.7.1.4 Findings of the Audit Committee
 - 4.7.7.1.5 The recommendations of the Audit Committee/ other action(s)

4.8 Investigation

- 4.8.1 All Protected Disclosures reported under this Policy will be thoroughly investigated by the Ethics Officer of the Company. Chairman of Audit Committee /Ethics Officer may at its discretion consider involving any other officer of the Company and/or an outside agency for the purpose of investigation.
- 4.8.2 The decision to conduct an investigation by itself is not an acceptance of the accusation and is to be treated as a neutral fact-finding process.
- 4.8.3 The identity of a subject will be kept confidential to the extent possible given the legitimate needs of the investigation.
- 4.8.4 Unless there are compelling reasons not to do so, subjects will be given reasonable opportunity for hearing their side during the investigation. No allegation of wrong doing against a subject shall be considered as maintainable unless there is good evidence in support of the allegation.
- 4.8.5 Subjects shall have a duty to co-operate with the Ethics Officer / Audit Committee during investigation to the extent that such co-operation sought does not merely require them to admit guilt.
- 4.8.6 Subjects shall have right to access any document/ information for their legitimate need to clarify/ defend themselves in the investigation proceedings.
- 4.8.7 Subjects shall have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with, and witnesses shall not be influenced, coached, threatened or intimidated by the subjects.
- 4.8.8 Subjects have a right to be informed of the outcome of the investigation. If allegations are not sustained, the subjects shall be consulted as to whether public disclosure of the investigation results would be in the best interest of the subject and the company.
- 4.8.9 Ethics Officer shall normally complete the investigation within 90 days of the receipt of protected disclosure.
- 4.8.10 In case of allegations against subject are substantiated by the Ethics Officer in his report, the Audit Committee shall give an opportunity to Subject to explain his side.

4.9 Audi Committee

If an investigation leads the Ethics Officer / Chairman of the Audit Committee to conclude that an improper or unethical act has been committed, the Ethics Officer / Chairman of the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as he may deem fit. It is clarified that any disciplinary or corrective action initiated against the subject as a result of the

findings of an investigation pursuant to this policy shall adhere to the applicable personnel policy for staff conduct and disciplinary procedures.

4.10 Reporting

The Ethics Officer shall submit a report to the Chairman of the Audit Committee on a regular basis about all Protected Disclosures referred to him/her since the last report together with the results of investigations, if any.

4.11 Confidentiality

The Whistle Blower, Ethics Officer, Audit Committee, the Subject and everybody involved in the process shall:

- 4.11.1 Maintain confidentiality of all matters under this policy.
- 4.11.2 Discuss only to the extent or with those persons as required under this policy for completing the process of investigations.
- 4.11.3 Not keep the papers unattended anywhere at any time.
- 4.11.4 Keep the electronic mails / files under password.

4.12 Protection

- 4.12.1 No unfair treatment will be meted out to a Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this policy. The company, as a policy, condemns any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle Blowers. Adequate safeguards will be provided to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties / functions including making further Protected Disclosure. The Company will take steps to minimize difficulties, which the Whistle Blower may experience as a result of making the Protected Disclosure. Thus, if the Whistle Blower is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the Whistle Blower to receive advice about the procedure, etc.

4.12.2 A Whistle Blower may report any violation of the above clause to the Chairman of the Audit Committee, who shall investigate into the same and recommend suitable action to the management.

4.12.3 The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under law.

4.12.4 Any other Employee assisting in the said investigation shall also be protected to the same extent as the Whistle Blower.

4.13 Disqualification

4.13.1 While it will be ensured that genuine Whistle Blowers are accorded complete protection from any kind of unfair treatment as herein set out, any abuse of this protection will warrant disciplinary action.

4.13.2 Protection under this Policy would not mean protection from disciplinary action arising out of false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fide intention

4.13.3 Whistle Blowers, who make any Protected Disclosures, which have been subsequently found to be mala fide, frivolous or malicious, shall be liable to be prosecuted. If the report of investigation is not to the satisfaction of the Whistle Blower, the Whistle Blower has the right to report the event to the appropriate legal or investigating agency. He shall also be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

4.14 Interpretation

Terms that have not been defined in this policy shall have the same meaning assigned to them in the Companies Act, 2013 and other applicable laws as amended from time to time.

4.15 Access to the Chairman of Audit Committee

The Whistle Blower shall have right to access Chairman of the Audit Committee directly in exceptional cases and the Chairman of the Audit Committee is authorized to prescribe suitable directions in this regard.

4.16 Communication

All Protected disclosures in writing or documented along with the results of Investigation relating thereto, shall be retained by the Company for a period of 7 (seven) years or such other period as specified by any other law enforce, whichever is more.

4.17 Administration & Review of Policy

A quarterly report about the functioning of the Whistle Blower Mechanism shall be placed before the Audit Committee. A quarterly status report on the total number of compliant received if any during the period with summary of the findings of Ethics Officer / AC and corrective steps taken should be send to the Chairman of the company. The HR Head shall be responsible for the administration, interpretation, application and Director will be responsible for review of this policy.

4.18 Amendment

The Company reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them.

5 Disciplinary Policy

5.1 Meaning of Disciplinary Action

Disciplinary action means imposing on an employee a punishment in accordance with the provisions of this manual with a view to correcting or punishing him.

5.2 Objectives of Disciplinary Action

The objectives of disciplinary actions are as follows:

- 5.2.1 To reform the employee or, in case of a serious misconduct or an offence involving moral turpitude, to remove him from the service of the company.
- 5.2.2 To deter other employees from such or similar conduct; and

- 5.2.3 To maintain the behavioral and ethical standards in, and efficiency of organization, of the company.

5.3 Commencements of Disciplinary Proceedings

Disciplinary proceedings are commenced by issuing to an employee a charge sheet for any misconduct alleged to be committed by him

5.4 Conclusion of Disciplinary Proceedings

The order of punishment is the culmination of the disciplinary proceedings.

5.5 Conclusion of Disciplinary Proceedings

Disciplinary action can be taken by the company against an employee for an offence/misconduct as defined hereinafter or for being convicted by a competent court of law for any offence in law.

5.6 Misconducts/ Offences

Misconduct means the following acts or omission on the part of any employee:

- 5.6.1 An employee shall be in breach of his contract of employment if he, as a measure of concerted action or individually on his own, does any of the following act or things, viz
- 5.6.2 Fails or refuses to perform normal work in the normal manner in the normal working hours
- 5.6.3 Resorts to non-cooperation
- 5.6.4 Adopts 'go slow' or work to rule' with intent to disrupt normal work
- 5.6.5 Is or has been un-authorized absent from the place of work (where by the terms of his employment he is required to work) even for a part of the day, during the time fixed for him by the management; and / or
- 5.6.6 Disrupt in any other manner, the company's work in premises or at any other place where by the employment, he is required to perform his duties.
- 5.6.7 Is medically or mentally unfit to perform normal duties assigned to him
- 5.6.8 Involved in any act punishable under the IPC
- 5.6.9 Knowingly makes a false statement in any application, declaration, statement, claim, bill or information submitted to the company in the course of, or in relation to, his employment or duties in the company.

- 5.6.10 Engaging in any trade, business, profession or calling outside the scope of his employment except with the prior written permission of the Managing Director.
- 5.6.11 Failure to maintain confidentiality regarding the company's affairs and the affairs of the company's customers and others having dealings with the company or divulging directly or indirectly, any information of a confidential nature either to a member of the public or an outside agency or to any employee of the company not entitled to such information unless
- 5.6.12 Willful insubordination or disobedience of any lawful and reasonable order/s of the management or a person placed in authority over him in the company
- 5.6.13 Willful slowing down in the performance of work
- 5.6.14 Gambling or betting on the premises of the company or while on duty
- 5.6.15 Willful damage, or attempt to cause damage, to any property of the company or of any of the company's customers, or others having dealings with the company
- 5.6.16 Gross negligence (even an isolated instance) involving or likely to involve the company in serious loss or causing or likely to cause loss of business or, reputation of the company
- 5.6.17 Habitual negligence in respect of the employee's duties
- 5.6.18 Drunkenness on the premises of the company, during various functions being organized by the company or representing the company in any such function or while on duty
- 5.6.19 Absence without leave or overstaying sanctioned leave without sufficient cause
- 5.6.20 Unpunctual or irregular attendance
- 5.6.21 Failure to show proper courtesy, consideration or attention towards his superior/s, or other employee/s of the company or the company's customers and others having dealings with the company
- 5.6.22 Unacceptable or unsatisfactory behavior with customers & colleagues while on duty
- 5.6.23 Marked disregard of ordinary decency and cleanliness in person and requirements of dress
- 5.6.24 Incurring excessive debts giving cause either for attachment order from a court of law or complaint /s to the company
- 5.6.25 Giving or taking a bribe or illegal gratification to or from a customer or an employee of the company or any other person with whom he may have to deal in the course of performance of his duty
- 5.6.26 Breach of any rule of business of the company or instruction/s for running any department
- 5.6.27 Not wearing uniform or wearing incomplete or unclean uniform while on duty
- 5.6.28 Any act or conduct which is prejudicial or likely to be prejudicial or the interest and / or reputation of the company

- 5.6.29 Any act or omission which is an offence under any law for the time being in force and applicable to the employee
- 5.6.30 Interfering with any other employee's annoyance to him at work; work, disturbing him or causing Indulging in any quarrel, abusive language, fight, loud talk or other disorderly or riotous behavior on the premises of the company
- 5.6.31 Committing theft, fraud, misappropriation or dishonesty in company's business or Property
- 5.6.32 Entering, or remaining on the premises of the company outside working hours except for bonafide reasons or if required by official superiors
- 5.6.33 Tampering with any records or notice of the company
- 5.6.34 Sexual harassment of woman at workplace or any fellow employee
- 5.6.35 The exercise of duties while under the influence of alcohol or psychoactive substances
- 5.6.36 Found careless with Health & Safety norms while performing duty
- 5.6.37 Any instance of rush driving, over speeding, drink & drive, traffic signal jumping or breach of any provision of Motor Vehicle Act 1988 or any other applicable act

5.7 Punishments

An employee found guilty of any misconduct may be awarded any of the following punishments:

- 5.7.1 Warning
- 5.7.2 Censure
- 5.7.3 Stoppage of increment/s
- 5.7.4 Recovery from the employee's salary or other amount/s as may be due to him from the company of the whole or part of any monetary loss caused by the negligence of or breach of orders by, the employee
- 5.7.5 Reduction to a lower grade and / or lower scale of pay
- 5.7.6 Suspension from the services
- 5.7.7 Dismissal from service

5.8 Consideration for awarding punishment/s

- 5.8.1 In imposing punishment on any employee, the authority concerned shall take into account the gravity of the misconduct, the previous record, if any, of the employee and any other aggravating or extenuating circumstances that may exist.
- 5.8.2 Not more than one punishment can be imposed on an employee for each charge of which he is held guilty. A charge sheet may contain more charges than one. No separate finding shall, be recorded in respect of each charge and one finding

shall be recorded for one charge sheet irrespective of number of charges listed in that charge sheet.

5.9 Procedure for imposing Punishment

No order imposing any punishment on an employee shall be made in respect of the punishment listed out in 5.7 except after an inquiry is held in accordance with the provisions of this chapter; provided: however, that no inquiry need be held for imposing any punishment on an employee who has voluntarily admitted a charge framed in a charge sheet issued to him.

5.10 Essential requirements of an inquiry

The inquiry referred to in paragraph 5.9 of above shall comply with the following essential requirements:

- 5.10.1 The employee proceeded against has been served with a charge sheet clearly informing him of the charges leveled against him, and giving him an opportunity to submit his explanation in the matter within a stipulated period
- 5.10.2 The witnesses on behalf of the company are examined in the presence of the employee in respect of the charges (except when an inquiry is held ex-parte)
- 5.10.3 The employee is given a fair opportunity to counter the company's documents and cross-examine company's witness/es
- 5.10.4 The employee is given a fair opportunity to produce document/s and or / witness/es, himself, in his defense, if he so wishes, on any relevant matter; and
- 5.10.5 The employee shall, if he so desires, be permitted to be defended at the enquiry by any other employee of the company. The employee cannot, however, be defended by a legal practitioner without the written permission of the disciplinary authority
(Note: where the inquiry officer and/or the management representative is a legally trained person, the employee shall be permitted to be defended by a legal practitioner, if he so desires)
- 5.10.6 The inquiry officer shall follow the principles of natural justice; and
- 5.10.7 The inquiry officer shall record his finding/s with reasons for the same in his report, which shall contain the gist of the charge/s, a gist of the defense of the employee in respect of each charge and an assessment of the evidence, oral as well as documentary, in respect of each charge.

5.11 Disciplinary Authority & Appellate Authority

- 5.11.1 The **General Manager** shall be the disciplinary authority in respect of the employees posted at the region or station. In the absence of the General Manager, the Managing Director may delegate this authority to any Manager / supervisor/ officer
- 5.11.2 The Managing Director shall be the appellate authority in respect of all employees.

5.12 Initiation of Disciplinary Proceedings

The disciplinary authority shall himself issue a charge sheet to an employee against whom disciplinary proceedings are proposed to be initiated

5.13 Suspension and Subsistence Allowance

- 5.13.1 Pending an inquiry or initiation of an inquiry, the disciplinary authority may suspend an employee. For the first three months of suspension, the employee will be paid a subsistence allowance equal to half of his monthly gross salary, and for the next three months, three fourth of his monthly gross salary, and thereafter, if the employee continues, full wages will be paid as subsistence allowance.
- 5.13.2 If it is decided not to impose any punishment on the employee, he shall be deemed to have been on duty throughout the period of suspension and be entitled to his full salary, which he would have drawn, minus the subsistence allowance paid to him, for the period of suspension
- 5.13.3 If any punishment is imposed on the employee, he will not be entitled to the difference between his gross salary and the subsistence allowance paid to him for the period of suspension

5.14 Inquiry Officer

The disciplinary authority may himself conduct the enquiry or he may appoint some other employee higher in rank than the employee proceeded against or an outsider as enquiry officer to conduct the enquiry and submit his finding/s to the disciplinary authority

5.15 Imposition of Punishment

- 5.15.1 Where the disciplinary authority himself conducts the inquiry and holds the employee guilty of the charge/s leveled against the employee, he shall give the employee a hearing as regards the nature of the punishment which he proposes to impose on him. The submissions, if any, made by the employee at the hearing shall be taken into account by the disciplinary authority in deciding upon the punishment, if any, to be imposed on the employee
- 5.15.2 Where the enquiry is conducted by any person other than the disciplinary authority and the employee has been held guilty of the charge/s leveled against him, the disciplinary authority may send, as far as possible, a copy of the finding/s to the employee and give him an opportunity to reply to the enquiry officer's finding/s before taking a decision on the findings
- 5.15.3 If the disciplinary authority accepts the findings of the enquiry officer, he shall give the employee a hearing as regards the nature of the punishment which he proposes to impose on him. The submissions, if any, made by the employee at the hearing shall be taken into account by the disciplinary authority in deciding the punishment, if any, to be imposed on the employee

5.16 Appeal

- 5.16.1 An employee aggrieved by an order imposing any punishment on him may appeal to the Managing Director within fifteen days of the date of receipt of the order by him.
- 5.16.2 Where the order appealed against is one of dismissal, the Managing Director shall, if so requested by the employee, hear the employee and take into account submissions made by him at the hearing on arriving at a decision on the appeal. No such hearing is necessary before disposing of an appeal/s in other cases.

5.17 Serving of Charge sheet and other communications

The charge sheet and all orders, notices and other processes in disciplinary matters will be served in person to the employee concerned or communicated to him by registered post at his last known address

(Note: the enquiry may be conducted in the English language but, where the employee does not know the English language and where he is not defended by a person who does not know English language, the proceedings must be explained to him in the language known to him)

6 Recruitment & Selection Policy

6.1 Policy Statement

DC Transport Management Pvt. Ltd. wants to be an equal opportunity employer, ensures no discrimination has been taken place based on cast, creed, color, gender, religion etc. and offer's a meaningful job that stand out for giving and rewarding responsibilities, a safe & challenging work environment and fair & equal compensation in line with minimum wages & local practice

6.2 Objectives

Considering the above, the objective of this policy is to ensure:

- 6.2.1 That our recruitment and selection policy result us getting the right people, in the right place and at the right time
- 6.2.2 That in 1st stage of recruitment process we have to ensure that minimum age for employment in company is 18 Yrs.
- 6.2.3 That we appoint on the basis of solely on merit and without discrimination
- 6.2.4 That this policy attracts and appoints applicants with the right skills, knowledge, behaviors and experience required for the position
- 6.2.5 That it aims to ensure that positions within the organization that affect organizational safety and security are filled by personnel that possesses the education, training, experience, knowledge and skills appropriate for the position
- 6.2.6 That our organization will ensure that the personnel who perform critical functions are maintaining their competence through continuous education and training under company's Training and Development policy
- 6.2.7 The Human Resource department will be responsible for all recruitment, based on the requirement of the company and as determined by the business plan.
- 6.2.8 Whenever it is considered necessary or desirable internal job posting will be done
- 6.2.9 Eligible employees mentioned at Para 6.2.7, shall be given adequate opportunities for being selected for the post. Employees who qualify in the selection process will be preferred candidates for appointment to the advertised position.
- 6.2.10 Whenever it is considered necessary or desirable internal job posting will be done

- 6.2.11 All external candidates shall be given equal opportunities and selection will be made on the basis of their meeting all the qualifying standards as established by the company for the mentioned post.
- 6.2.12 Candidates whose references are well known to the company or the employees of the company shall be preferred for fresh appointment.
- 6.2.13 The recruitment for all non-managerial positions will be done as follows:
- 6.2.13.1 Short-listed candidates either through walk-ins or any other means who satisfy preliminary criteria may be called for a screening interview. During the screening interview the basic qualification of the candidate shall be confirmed.
- 6.2.13.2 Those qualifying will then be administered written aptitude tests.
- 6.2.13.3 This will then be followed by interview/s.
- 6.2.14 For recruitment of senior/managerial appointments, besides the above, the candidates will also be tested on the below parameters during interview process.

6.2.15 **Table:**

Middle Management	Senior Managerial Positions
a. Functional Expertise/ knowledge of specific job skills and experience	a. Functional Expertise/ knowledge of specific job skills and experience
b. Quality of Experience	b. Communication Skills
c. Analytical and Problem solving	c. Appearance & Presentation
d. Quality of Experience	d. Quality of Experience
e. Flexible & Adaptable	e. Overall Attitude
f. Communication & Presentation	f. Decision Making ability
g. Initiative & Innovative	g. Initiative
h. People Management skills	h. Related education & Training
i. Business Acumen	i. People Management Skills
j. Learning & Growth Potential	j. Confidence
k. Overall Attitude	k. Business Acumen
l. Familiarity with the technology	l. Learning & Growth Potential

- 6.2.16 All the candidates shall be communicated the results of the tests/interviews and short-listed candidates will be called for final discussions, if required, and finally the offer letter issued to the selected candidates on the completion of the selection procedure.
- 6.2.17 All documents and materials used and submitted by the candidates will be the exclusive property of the company. The candidate cannot claim any refunds.
- 6.2.18 All appointments and fitments in the appropriate grade/scale shall be made in writing only by the Director / Delegated Authority.
- 6.2.19 The appointment letters of all employees at Managerial level shall be executed by the Director /Delegated Authority.
- 6.2.20 Unless otherwise specified, all appointments shall be on probation. The period of probation shall ordinarily be six months up to Sr. Executive and 1 year for AMs and above unless specified otherwise.
- 6.2.21 The Director/Delegated Authority shall have the power to reduce / waive the period of probation/extended period of probation in deserving cases by an order in writing.
- 6.2.22 No employee is entitled to be confirmed or to be treated as confirmed or deemed to have been confirmed by reason only of his having completed the period of probation and/or extended period of probation, as the case may be, unless an order of confirmation, made in writing by the HR Head / Delegated Authority, is served on the employee.
- 6.2.23 Every person entering the company's service shall, before joining the service, produce satisfactory proof of his date of birth, educational qualifications, proof of residence, police verification, experience certificate and release documents from previous employer, if any.
- 6.2.24 Every person entering the company's Service shall be responsible for getting his security clearance from the competent authority. Any candidate failing to do so will be disqualified from joining the company. The continuation of service will be dependent on the staff getting such clearance from time to time.
- 6.2.25 Every person entering the company's Service will need to be declared as being medically fit by a registered medical practitioner.
- 6.2.26 Every person entering the company's service shall communicate in writing his full postal address at the place of posting and residential telephone number, if any, and keep the company informed of any change therein from time to time.

7 Environmental Sustainability Policy

7.1 Introduction

The earth's environment is under severe stress from uncontrolled human activity, threatening the survival of our society and the performance of DC Transport mission.

DC Transport accepts that it must work to preserve the environmental sustainability of the planet, at all levels of its operations – in its own practice, as a participant in a community of practice, and as a participant in the Indian social discourse.

DC Transport aspires to minimize its impact on our environment and maximize the effective use of resources. We strive to achieve this by increasing communication and awareness of our efforts in accordance with this policy and fostering responsible environmental behavior amongst staff, volunteers, and users at all levels.

DC Transport is committed not only to complying with applicable law in all of its operations but to minimize risks and impacts through the development of robust and documented systems to implement, measure, monitor, and disseminate excellent environmental performance both within its operations and to the broader community.

7.2 Purpose

This Environmental Sustainability Policy aims to integrate a philosophy of sustainable development into all the organization's activities and to establish and promote sound environment practice in our operations.

7.3 Initiatives Towards Environmental Sustainability

DC Transport commits itself to minimizing its impact on our environment through below mentioned initiatives:

- 7.3.1 Providing a safe and healthful workplace;
- 7.3.2 Having an environmentally sustainable aware culture, where responsibility is assigned and understood;
- 7.3.3 Taken aggressive step to convert entire fleet into CNG from Petrol to Diesel.
- 7.3.4 By 2025, planning to convert entire fleet from CNG to electric engine, condition to the succession of electric engine technology;
- 7.3.5 No to use of papers, started using technology instead of keeping physical records;
- 7.3.6 Ensuring timely services of vehicle to keep low emission level;
- 7.3.7 Being an environmentally responsible neighbor in our community;
- 7.3.8 Conserving natural resources by reusing and recycling;

- 7.3.9 Using, in our own operations, processes that do not adversely affect the environment;
- 7.3.10 Ensuring the responsible use of energy throughout the organization;
- 7.3.11 Participating in efforts to improve environmental protection and understanding;
- 7.3.12 Taking steps to improve environmental performance continually;
- 7.3.13 Conducting rigorous audits, evaluations, and self-assessments of the implementation of this policy;
- 7.3.14 Working with suppliers who promote sound environmental practices; and
- 7.3.15 Enhancing awareness among our employees, volunteers, and users – educating and motivating them to act in an environmentally responsible manner.

7.4 Responsibilities

- 7.4.1 It shall be the responsibility of the Director to establish, implement and maintain these policies and procedures and to bring these procedures into effect.
- 7.4.2 DC Transport will develop guidelines for staff, volunteers and users to adopt sound environmental work practices, and adequate training will be provided to ensure these practices are carried out.
- 7.4.3 DC Transport will act responsibly to correct incidents or conditions that endanger health, safety, or the environment. It will promptly report any such incidents to the relevant authorities, and inform affected parties as appropriate.
- 7.4.4 DC Transport will use all reasonable endeavors to minimize materials and energy use, prevent air, water, and other pollution, and dispose of waste safely and responsibly.
- 7.4.5 DC Transport will use all reasonable endeavors to meet or exceed all applicable government requirements and voluntary requirements generally observed in its field, and will, in addition, adhere to the more stringent requirements of its own environmental policy.
- 7.4.6 DC Transport will maintain an open and honest dialogue with staff, volunteers, stakeholders, and the public about the environmental, health and safety performance of its operations and services.
- 7.4.7 DC Transport will use reasonable endeavors to ensure that every employee, volunteer and contractor is informed of and expected to follow this policy and to report any environmental, health, or safety concern to management so that prompt action may be taken.

8 Employee Health & Safety Policy

8.1 Purpose

A health and safety policy ensures that the employer complies with the Occupational Safety and Health Act and relevant state legislation. It provides guidelines for establishing and implementing programs that will reduce workplace hazards, protect lives and promote employee health.

8.2 Objectives

DC Transport shall ensure implementation of environmental, health and safety policy:

- 8.2.1 Eliminate or mitigate adverse environmental impacts on occupational health and safety risk.
- 8.2.2 Hazard identification and risk assessment of all activities undertaken to eliminate / mitigate the risk.
- 8.2.3 Engaging with the staff in matters related to their own health and safety.
- 8.2.4 Ensuring that control measures and emergency procedures in place are effective, monitored and maintained
- 8.2.5 Complying with legislation and applicable requirements.
- 8.2.6 Encourage safety culture wherein customer's voluntary reports risks and hazards issues.
- 8.2.7 Continually review and evaluate the effectiveness of its "Health & Safety Management System".

8.3 Initiatives Towards H&S

DC Transport takes certain initiatives towards H&S:

- 8.3.1 Health checkup camp is organized time to time to ensure the good health of employee.
- 8.3.2 All employees are covered under ESIC scheme to get the unconditional health benefits.
- 8.3.3 Vehicles & office premise is fire system enabled to meet fire related emergency and to ensure the safety of internal (employees) & external customers.
- 8.3.4 First Aid box & Umbrella is kept in the vehicles mandatorily to meet accident-related emergency and address the weather-related issues.

8.4 H&S Review System

- 8.4.1 Managing Director is responsible for implementation & review of H&S policy.

- 8.4.2 To ensure the effectiveness of H&S system quarterly audit is done by H&S Officer.
- 8.4.3 To ensure proper implementation of H&S System Managing Director review the quarterly audit and get the yearly audit done.
- 8.4.4 To ensure H&S of customers, all customers are empowered to report the H&S related issues to H&S officer.
- 8.4.5 H&S Officer is responsible to resolve all the reported issues within 48 hrs.
- 8.4.6 If in case any reported H&S issues is not resolved within defined timelines, customers are empowered to report that issues directly to Managing Director.
- 8.4.7 Managing Director is also responsible to resolve reported issue within 24 hrs. of reporting.
- 8.4.8 In case of any accident happen due to reported issue/hazard, management will take the complete accountability of the same under H&S system.

9. DIVERSITY AND INCLUSION POLICY

DC TRANSPORT publicly reports on representation (percentage of employees per diversity category, such as gender, minority status, and other indicators of diversity). Public reporting is on our website in the GRI (Global Reporting Initiative) report.

Workforce metrics include the percentage of employees per employee category, age group, gender, and other indicators of diversity.

We have programs and initiatives to promote inclusion and to recruit, develop, and retain diverse talent. We have D&I trainings (i.e., Unconscious or Racial Bias Awareness), mentorship programs, and Recruitment programs targeting diverse talent.

DC TRANSPORT is committed to a workplace environment that promotes diversity and inclusion and creates an open and inclusive culture where everyone feels valued. **Our Diversity and Inclusion (D&I) Policy outlines our commitment to promoting an inclusive culture where all individuals feel valued, respected, and empowered to contribute to the success of the company.**

This policy applies to all employees, contractors, job applicants, and stakeholders involved with DC TRANSPORT. It covers recruitment, training, development, promotions, and all aspects of employment, ensuring a fair and inclusive approach across all levels of the organization.

Our Commitment

- **Diverse Workforce:** We aim to recruit, develop, and retain a workforce that reflects the diversity of the communities we serve. This includes individuals of different backgrounds, experiences, skills, and perspectives.
- **Equal Opportunity:** We provide equal employment opportunities to all employees and applicants, irrespective of race, color, ethnicity, religion, gender, sexual orientation, gender identity or expression, disability, age, national origin, veteran status, marital status, or any other characteristic protected by law.
- **Inclusive Culture:** We are committed to creating a work environment where everyone feels included and respected. We encourage open communication, value diverse perspectives, and ensure every employee has the opportunity to contribute and thrive.
- **Non-Discrimination and Harassment-Free Workplace:** DC TRANSPORT strictly prohibits any form of discrimination, harassment, or bullying. All employees are expected to treat each other with dignity and respect, and any inappropriate behavior will be addressed swiftly and effectively.

Key Areas of Focus

- **Recruitment and Hiring:** We will actively work to remove bias from our hiring process, utilizing inclusive job descriptions, diverse hiring panels, and outreach efforts aimed at underrepresented groups in the transport sector.
- **Training and Development:** We provide ongoing diversity and inclusion training to ensure all employees understand the importance of inclusion, unconscious bias, and the value of a diverse workforce. We are committed to the professional development of all employees and offer equitable access to training and advancement opportunities.
- **Employee Resource Groups (ERGs):** We support the formation and development of ERGs to provide a platform for employees to connect, share experiences, and promote diversity and inclusion initiatives across the company.

We will ensure that all employees are aware of this policy and understand their role in promoting diversity and inclusion. Our D&I policy will be communicated during onboarding, included in the employee handbook, and regularly reinforced through company-wide communications and events.

At DC TRANSPORT, diversity and inclusion are integral to who we are and how we operate. We believe that an inclusive workplace fosters innovation, drives business success, and enables us to better serve our customers. We are committed to ensuring that every employee, regardless of their background, feels valued, respected, and able to contribute to our collective success.

DC TRANSPORT believes that embracing equality and diversity in the workplace benefits not just DC TRANSPORT but also individual employees, divisions, and our customers. All our employees bring their own backgrounds, work styles, distinct capabilities, experience, and characteristics to their work. We recognize that our talented and diverse workforce reflects the diversity of our customers and markets and we want to utilize the wide range of skills, knowledge and experience in our business while complying with legislation.

We recognize that a “one-size-fits-all” approach to managing people does not achieve fairness and equality of opportunity for everyone. As well as treating people with dignity and respect, DC TRANSPORT strives to create a supportive environment in which all employees can flourish and reach their full potential, regardless of differences, experience, or education. Harnessing the wide range of perspectives this diversity brings, promotes innovation and helps make us more creative and competitive.

DC TRANSPORT is committed to an inclusive working environment which respects diversity of characteristics including but not limited to sexual orientation, age, gender, race, ethnicity, family status, disability, civil status, and religious beliefs. We implement policies and practices that value diversity, provide equality of opportunity and ensure that no job applicant, employee, customer or supplier receives less favorable treatment. We also ensure that other policies and practices reflect our commitment to treating people fairly and respecting the dignity of employees at all times.

1. ESG POLICY OF DC TRANSPORT

2. **DC Transport has a clear understanding of ESG, i.e., E:** Environmental – How a company impacts and is impacted by the environment (e.g., energy usage, pollution, carbon footprint, waste management), **S:** Social – A company’s relationships with its stakeholders (e.g., employees, customers, communities, diversity, human rights) and **G:** Governance – Internal practices and policies that foster transparency, ethical behavior, and compliance (e.g., board structure, executive pay, corruption policies).
3. **Sustainability** is the core of DC Transport and follows the practice of meeting the needs of the present without compromising the ability of future generations to meet their needs. Our focus areas include: **Environmental Sustainability** (minimizing

ecological footprint), **Social Sustainability** (community well-being) and **Economic Sustainability** (long-term economic health).

As **ESG** is often used as a metric to assess **Sustainability** performance. Both aim to promote long-term value creation by considering environmental, social, and governance factors. **Sustainability** goals are often achieved through the implementation of strong **ESG practices**.

Key Components of our ESG Policy include as follows:

Key Components of Social (E) in ESG

4. **Climate Change:** Carbon emissions reduction, renewable energy adoption.
5. **Resource Management:** Efficient use of water, energy, and materials.
6. **Waste Management:** Minimizing waste, recycling, and circular economy models.
7. **Biodiversity:** Protecting natural ecosystems and reducing habitat destruction.

Key Components of Social (S) in ESG

8. **Diversity and Inclusion:** Promoting gender, racial, and cultural diversity.
9. **Labor Practices:** Ensuring fair wages, safe working conditions, and employee welfare.
10. **Human Rights:** Protecting human rights in supply chains and operations.
11. **Community Engagement:** Giving back to local communities through philanthropy and partnerships.

Key Components of Governance (G) in ESG

12. **Board Composition:** Diverse and independent boards with clear oversight.
13. **Transparency:** Reporting on ESG metrics and corporate governance policies.
14. **Ethical Leadership:** Anti-corruption measures, executive compensation alignment with sustainability goals.
15. **Shareholder Rights:** Ensuring that shareholder interests are well-protected.

We do ESG Reporting of ESG data through frameworks **GRI (Global Reporting Initiative)**. This reporting helps track performance, ensure compliance, and provide transparency to investors and stakeholders. We have integrated ESG into financial analysis and business strategy. Our report provides investors with insights into our non-financial risks and opportunities. It allows them to make informed decisions based on how well DC Transport is managing its environmental, social, and governance impacts. Our ESG reporting strengthens the trust with our stakeholders, including customers, employees, communities, and shareholders and helps in mitigating Risks.

1. Environmental

1.1. Carbon Emissions Reduction

We are committed to reducing our carbon footprint by implementing measures across our fleet and operations:

- **Fleet Electrification:** Transition of a significant portion of our fleet to electric vehicles (EVs) or hybrids by 2028.
- **Carbon Offsetting:** Partner with carbon offset programs to neutralize unavoidable emissions.
- **Fuel Efficiency:** Optimize route planning to minimize fuel consumption, adopt fuel-efficient driving practices, and regularly maintain vehicles to ensure top performance.
- **Emission Tracking:** Implement a robust system to measure, monitor, and report on our carbon emissions and develop clear targets for reduction.
- **Route optimization**
- **Training drivers to save fuel.**
- **Adoption of Solar Energy.**

1.2. Waste and Resource Management

- **Eco-friendly Materials:** Transition to using sustainable and recyclable materials for vehicle maintenance and office operations.
- **Paperless Operations:** Adopt digital solutions to reduce paper usage in business processes, such as e-receipts and online billing systems.
- **Waste Reduction:** Implement proper disposal, recycling, and waste management protocols for vehicle parts and office supplies.

1.3. Sustainable Sourcing

We prioritize the selection of environmentally responsible suppliers and partners:

- **Green Partners:** Partner with suppliers that meet sustainable standards, especially for vehicle parts, fuels, and maintenance services.
- **Energy Efficiency:** Collaborate with renewable energy providers where possible to power our charging infrastructure for electric vehicles.

1.4 Biodiversity and Tree Plantation

- We have plantation drives with local NGOs.
- To protect biodiversity, we ensure our operations are clean.

2. Social

2.1. Driver/Customer Well-being

We value the well-being of our employees and drivers, ensuring a safe and supportive work environment:

- **Health and Safety:** Provide regular training on road safety, emergency response, and vehicle handling. Ensure that all vehicles meet safety standards.
- **Fair Compensation:** Ensure that all employees and drivers receive fair wages and benefits. Regularly review pay structures to align with living wage standards.
- **Driver Welfare:** Offer wellness programs, mental health support, and other benefits aimed at improving the physical and mental well-being of drivers.

2.2. Diversity and Inclusion

We foster an inclusive work culture that values diversity and provides equal opportunities:

- **Equal Opportunities:** Implement a zero-tolerance policy against discrimination based on gender, race, ethnicity, religion, sexual orientation, or disability.

- **Gender Balance:** Promote diversity within our workforce, particularly in traditionally underrepresented areas, LGBTQ, women and minorities to join our workforce.

2.3. Community Engagement

- **Local Hiring:** Prioritize hiring from local communities to support economic development in the regions we operate.
- **Partnerships with NGOs:** Collaborate with local NGOs to support causes such as road safety education, clean energy, and community welfare.
- **Accessibility:** Ensure that our services are accessible to differently-abled individuals and offer discounted rates to vulnerable sections of society, such as students and the elderly.

3. Governance and Ethical Conduct

3.1. Corporate Governance

We uphold the highest standards of governance to ensure transparency and accountability in all our business dealings:

- **Board Oversight:** Our Board of Directors will have oversight of ESG matters, with a dedicated ESG Committee responsible for monitoring progress and ensuring compliance.
- **Grievance Mechanism:** For any kind of impact on the economy, environment, and human beings, the grievance mechanism is there.
- **Transparency:** Maintain open and transparent communication with stakeholders through regular ESG performance reports and disclosures, following industry best practices.

3.2. Ethical Business Practices

- **Anti-corruption:** Uphold a zero-tolerance policy for bribery and corruption. Implement regular audits and training programs to prevent any unethical practices.
- **Data Privacy:** Ensure the confidentiality and security of customer data through strict data protection protocols and compliance with relevant regulations (e.g., GDPR).
- **Whistleblower Protection:** Provide a safe and confidential channel for employees to report unethical behavior without fear of retaliation.

3.3. Compliance with Laws and Regulations

We are committed to complying with all local, national, and international laws related to our operations, including labor laws, environmental regulations, and transportation standards. We regularly review our policies to ensure alignment with evolving regulatory requirements.

4. Continuous Improvement

We recognize that sustainability is an ongoing journey. We will regularly review and update our ESG policies and practices to adapt to new challenges and opportunities. We commit to engaging with our stakeholders—including customers, employees, investors, and regulators—to ensure our ESG initiatives are aligned with their expectations.

5. Reporting and Accountability

We will measure, report, and publicly disclose our ESG performance on an annual basis, tracking progress against established goals and targets. We commit to third-party verification of our ESG data to ensure the accuracy and credibility of our reporting.

Conclusion

At DC Transport, we are dedicated to making a positive impact on the environment, our society, and our governance practices. This ESG policy reflects our commitment to sustainable growth, mitigation of any kind of impacts on human beings, ethical conduct, and social responsibility.