



VEDIKA CREDIT CAPITAL LTD
PARTNER IN THE GROWTH OF MICRO ENTREPRENEURS

2022

ACTION POLICY ON STAFF MISCONDUCT

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INTRODUCTION

The Board of Directors (“Board”) of Vedika Credit Capital Limited (“Company” or “Vedika” or “VCCL”), has adopted the following policy which encompasses practices relating to identification, assessment, monitoring of various Staff conduct on the basis severity of risks and its action process

CLASSIFICATION OF MISCONDUCT

Misconduct is classified under two broad categories.

- Minor misconduct and
- Major misconduct.

Following are the illustrative list of misconduct on the basis of risk along with Action Plan

MINOR MISCONDUCT

- **LOW RISK**
 - Lack of cleanliness at work premises
 - No maintenance of branch assets as per assets report
 - No maintenance and no updating of attendance register in branch office
 - No display of mandatory policy and compliance documents in branch office
 - AM & above level Tour Plans but deviation found in tour without any Approval
- **MEDIUM RISK**
 - No updating/maintaining branch cash book and closing as per approval limit
 - Loan diverts maximum one member in a group.
 - There should not be multiple centers running on same address
 - No maintenance & update of the BIS Files
 - No maintenance of OD follows up sheet in OD branches/ Bounce cases
 - Monthly Surprise visit not done by BM as assigned at least 35 Centre
 - Monthly Surprise visit not done by AM as assigned at least 35 Centre
 - No Maintenance of supervision register by the AM during the Branch visit



- Loan has not been utilized for the purpose for which it was sanctioned for Amount Rs 50,000 & above
- Attendance of centre meeting is below 70 %
- Centre Member House Distance of more than 1 Km from the Center
- RE/BM Movement planned but not done

- **ACTION PLAN**

- Warning Letter issued by HR with caution
- Loss of incentive

MAJOR MISCONDUCT: PART A

- **HIGH RISK**

- No Maintaining or Updating key Register (Locker)-1st key Holder and 2nd Key Holder, no changes in key holder (1st is always 1st key holder and 2nd is always 2nd key holder) in same branch
- No field Investigation before CGT
- No maintaining of cash book on daily basis
- No maintenance of Currencies denomination in Cash book
- No maintenance of Denomination/repayment/bank deposit details in file
- Not following audit observation as mentioned in the Audit register
- Members house verification not done by BM during GRT. (JLG/MHL)
- Loan disbursement done by the RE in the absence of BM or any senior
- In CAR (Centre Attendance Register) collection amount not recorded by RE/BM
- In CAR signature not done by RE/BM after collection.
- Employee Working in the Branch without HR formalities

- **ACTION PLAN**

- Loss of Incentives for 3 months
- Transfer Posting
- No Future Increment

- Final Warning Letter

MAJOR MISCONDUCT: PART B

- **HIGH RISK**

- Loan given to the rented members
- More than one family person in same group / In Centre more than two close relatives as per policy
- Cases to be found above GEO limit (From Branch 20 km as per policy)
- No cross check done of all original document during GRT
- Personal use of cross sale products stored in branch
- Personal involvement of employee with member
- Tempering in the document -High mark - Fake signature -Others if any
- Members /Business verification not done at the time of personal discussion /Fake report (MEL/MBL)
- Integrity issue of the employee charged money to create group, collection of extra amount collection done but not deposited in Branch on same day,
- Integrity issue shortage of cash found at the time of physical verification of Cash Book
- Integrity issue about character like consumption of Alcohol and Non-Veg in Vedika work place/offices

Note: If any of the above misconduct is found by any staff member, he will be subjected to disciplinary action and if found that charges are true, he will be subjected to punishment as mentioned above

- **ACTION PLAN**

- Resignation / Termination with immediate effect / 7 working days with or without terminal benefit

OTHER POINTS

- 1st Major case warning should be treated as yellow card, 2nd as a Red Card and 3rd termination from service
- Close relatives: -Relatives are defined as the following for women customers regarding same group/Center as per policy

- mother
- mother-in-law
- sister
- sister-in-law (Gotni and Nanad)
- daughter
- daughter-in-law

PERIODICAL REVIEW OF THE POLICY

The Policy is flexible and easy to understand and comply with by all levels of employees. The Board should review this Policy periodically but at least once in a year, so that it remains appropriate in the light of material changes in regulatory requirement with respect to the Company's size, complexity, geographic reach, business strategy, market and best governance practices.

The policy can also be reviewed as and when deemed necessary by the Top Management and amendments effected to the same, subject to approval of the Board if any, and when practical difficulties are encountered. The Top management may also review the policy on document retention to comply with any local, state, central legislation that may be broadcast from time to time

AMENDEMENT OF THE POLICY

The Board of Directors on its own and/or on the recommendation of the top management can amend this policy as and when required deemed fit. Any or all provisions of this Policy would be subjected to revision/amendment in accordance with the regulations on the subject as may be issued from relevant statutory authorities, from time to time.