

TRAINING AND AWARENESS POLICY

BEIL Group recognizes the importance of having a skilled workforce in order to achieve strategic and operational plans and is committed to providing an environment that is conducive to effective performance and promotes training and development opportunities for all employees.

The policy is applicable to BEIL Infrastructure Limited and its group companies (hereinafter referred to as BEIL Group). BEIL Group consists of BEIL Infrastructure Limited, Enviro Technology Limited, BEIL Research and Consultancy Private Limited, Kerala Enviro Infrastructure Limited, Shivalik Solid Waste Management Limited, Coimbatore Integrated Waste Management Company Private Limited, Gharpure Engineering and Constructions Private Limited, Gharpure Engineering Vasai Virar STP Private Limited and Tatva Global Water Technologies Private Limited.

In the event of any doubts or questions concerning this policy, please seek advice from Head of Department or HR Head or Compliance Officer.

“**Compliance Officer**” wherever mentioned in this document refers to Compliance Officer of the Group.

Aim of this Policy

To provide a framework for training and development that ensures employees have necessary competencies to deliver on BEIL Group's strategic and operational plans as well as making sure that employees understand all the relevant laws, regulations, and internal policies and know how to adhere to them in their daily work. The training walks employees through examples of how issues of ethics and compliance apply to their roles in the workplace. The policy aims to create awareness around integrity compliance framework that includes policies and procedures on integrity, code of conduct, ethics, anti-corruption, whistle blower, business partner, recruitment, finance manual, etc.

Scope of this Policy

This policy relates to the Training and Development of all BEIL Group employees. This policy applies to all permanent, Fixed Term (skilled) or part-time employees, and trainees of the company.

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Training can be carried out as face-to-face training as well as by using media (e.g., web-based training, Live Online Training, or other electronic training material).

Policy Statements

There will be equality of opportunity for all BEIL Group employees to develop their knowledge, skills and abilities through a blend of learning methods including mentoring, coaching, on the job learning, courses, conferences and seminars.

The Training Plan, outlining planned in-house training courses will be approved by the Management.

All training, i.e. courses, workshops, seminars, and conferences will be co-ordinated through the HR Department.

The HOD will agree with their team member, how knowledge/skills learned will be shared to inform team/organizational learning.

Employees participating in training will satisfy all attendance, assessment and evaluation requirements within the required timeframes.

Procedure

This procedure should be followed when Employees want to attend external training sessions or conferences:

1. Employees or their HOD identify the need for training.
2. Employees and HOD discuss potential training programs or methods and come up with suggestions.
3. Employees or HOD contact HR and briefly present their proposal in the prescribed form.
4. HR researches the proposal, with attention to budget and training content.
5. HR may approve or reject the proposal. If they reject it, they should provide employees with reasons in writing.
6. If HR approves, they will make arrangements for dates, accommodation, reserving places etc.

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7. In cases where the company doesn't pay for the training directly, Employees will have to pay and send invoices or receipts to HR. HR will approve Employee reimbursement according to this information.
8. If an Employee decides to drop or cancel a training, they will have to inform HR immediately. They will also have to shoulder any cancellation or other fees.
9. In cases where training ends with examination, employees are obliged to submit the results. If they don't pass the exam, they can retake it on their own expense.

Generally, the Company will cover any training fees including registration and examination (one time). They may also cover transportation, accommodation and personal expenses. This is left to Management's discretion. If HR decides to cover these costs, they should make arrangements themselves (e.g. tickets, hotel reservations). Any other covered expense that employees have will be reimbursed, after employees bring all relevant receipts and invoices.

HR's responsibilities also include:

- Assessing training needs
- Maintaining budgets and training schedules
- Assisting with learning and development activities and strategies
- Promoting corporate training programs and employee development plans

Compliance Training and Awareness

The Company shall conduct an annual training program focused on Code of Conduct, Anti-bribery corruption policy [ABC policy], whistle blower policy and other related policies. Detailed and customized training deck shall be prepared for the training programs. It must be ensured that management; and employees shall attend these training programs.

Attendance records and feedback forms for each training program shall be maintained and documented by the HR Department. In event of locational/connectivity challenges, online/local training programs may be conducted.

The HR Department in consultation with compliance officer shall biennially update the training materials to cover newer risks, measures taken by the company, recent case studies and changes to the Integrity Compliance Program.

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To further the awareness amongst the attendees, the Company may decide to engage independent agencies/firms/domain experts to assist the company in conducting the training programs.

Additionally, the HR Department in consultation with compliance officer shall endeavor to periodically emphasize the key provisions of code of conduct and ABC policy through innovative channels, including but not restricted to use of screensavers, posters, surprise quiz sessions, periodic leadership messages, and so on. The Compliance officer shall document each awareness initiatives undertaken to strengthen the compliance framework.

Records

Following records to be maintained for respective training sessions conducted at BEIL Group.

1. Register for trainings conducted during respective financial year.
2. Feedback of trainees.
3. Attendance Sheet.

Revision History

Issue	Date	Description of amendment
R-0	01/01/2021	--- x --- x --- x ---
R-1	19/08/2021	Broadening applicability to include employees such as contractors / consultants, mode of training, training records, amongst others
R-2	01/01/2023	all employees are required to attend at least one (1) training on ICP in a financial year.
R-3	01/01/2024	Modification in scope of policy and Para related to Compliance Training and Awareness