

Ambuja Cement	Document No : Ambuja / HR / ITC / 01		
	Issue Date : 01.07.2020	Revision Date : 01.07.2020	Revision No :1.0
SOP Name: Ambuja IT Consequence Management Policy.			

Objective of the Policy

The policy is aimed at ensuring that issues of violations to the IT policy are dealt with in a fair and consistent manner. The policy will help the employee concerned to correct oneself or to change behaviour to reach acceptable standards. This provides for employees to take appropriate corrective action where those standards are not met.

The purpose of this policy is to educate employees on the consequences of violation of stated IT policy of the company. The disciplinary procedure is normally only used where other interventions have failed to produce the required improvement or when the conduct matter is sufficiently serious that requires immediate formal action.

Scope

This policy will apply to all employees of Ambuja Cement.

General Principles

- **Fairness:** the application of this procedure will be consistent, prompt, impartial, reasonable, and applied without discrimination.
- **Confidentiality:** information relating to an allegation of misconduct will not be divulged to any parties not involved in the disciplinary process. Statements, letters and other communications will be strictly confidential to those involved in the disciplinary procedure.
- **Natural justice:** at every formal stage of the disciplinary procedure, the employee will be advised of the nature of the complaint, and will be given the opportunity to state his / her case.

General Policy

After considering all aspects of each violation of the employee, the company reserves the right to take any of the following disciplinary actions in response to severity of the violation of IT policy.

1. Verbal warning
2. Written warning
3. Suspension
4. Termination

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There is no requirement that discipline be progressive. In other words, there is no requirement that one or more verbal warnings must precede a written warning, or that one or more written warnings must precede suspension or termination. The action shall commensurate with the nature of the violation.

Consequences

1. Verbal warning

- a. A verbal warning is a conversation between the employee and his manager wherein the employee is made to understand the implication of the violation made by the employee.
- b. Although verbal, the warning should be documented in writing, including:
 - i. The date of the warning
 - ii. The specific violation of the IT policy of the company
 - iii. The expected corrective action and a timeline for the same
- c. The documentation will be placed in the employee's personnel file.

2. Written warning

- a. A written warning is a formal written notice from the HR to the employee documenting the consequence of the violation to the IT policy made by the employee.
- b. The warning should be documented in writing, including:
 - i. The date of the warning
 - ii. A description of the specific violation of the IT policy.
 - iii. The observation of the committee that investigated the violation
- c. The written warning will be filed in the employee's personnel record by HR.

3. Suspension

- a. Suspension means the employee is relieved of his/her job assignment for a specific period of time. .
- b. During this time, the employee shall not be physically present in the office.

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- c. The employee will not be paid salary for the suspension period.

4. Termination

- a. Termination means the employee is permanently relieved of all duties and his or her employment with the company
- b. The written notice of termination shall include the effective date of the termination
- c. The notice of termination will be filed in the employee's personnel record by HR

Conducting an investigation

The investigating manager appointed for the investigation will conduct an investigation which is confined to establishing the facts of the case and will include all aspects of the violation made by the employee to the IT policy of the company.

The nature and extent of the investigation will depend on the seriousness of the matter. The investigating manager will be accompanied by a colleague from Human Resources at such meeting(s) to provide advice and guidance. The investigating manager will prepare a report based on the findings of his / her investigation. The investigation team will necessarily have a representative from the IT function.

Decision

Based on the inputs received from the investigation committee, actions will be taken by the HR as detailed in the Annexure I

The ownership of the policy will be with Director HR and will be reviewed every year.

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Annexure - I

The possible actions that can be taken for violations to the IT policy are as under

SI	Violation	Outcome of the Investigation	Instance	Impact	Consequence	Remarks
1	Computer system breach	Loss of non-critical, public data	1 st time	Low	Verbal Warning	Violation owing to Ignorance
		Loss of internal, but not restricted data	1 st time	Medium	Written Warning	Violation owing to Negligence
			2 nd time	Medium	Suspend without pay for a week	Repeat violation – bordering malicious
			3 rd time	Medium	Termination	Malicious
		Loss of restricted/ confidential data (Labelled as confidential)	1 st time	High	- No Promotion for that year - Rating can't be E for that year - Suspension for a month	Negligence
			1 st time	High	Termination	Malicious
2	Unauthorized access (failed or successful) to, or use of, systems, software, or data	Access to any data or services	1 st time	Medium	Suspend without pay for a week	Violation owing to Negligence
			1 st time	Medium	Termination	Malicious
3	Unauthorized changes to systems, software or data	Operational interruptions	1 st time	Low	Suspend without pay for a week	Malicious
		Loss of revenue	1 st time	High	Termination	Malicious
4	Loss of equipment storing institutional data	Loss of revenue, operational interruptions	1 st time	High	Written Warning	Negligence

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SI	Violation	Outcome of the Investigation	Instance	Impact	Consequence	Remarks
	Theft of equipment storing institutional data	Loss of revenue, operational interruptions	1 st time	High	Termination & Legal course as appropriate	Malicious
5	Interference with the intended use of IT resources	Operational interruptions	1 st time	High	Written Warning	Negligence
		Loss of Revenue	1 st time	High	Termination	Malicious
6	Compromised user accounts (responding to a security threat e.g. phishing email, etc.)	Operational interruptions	1 st time	Medium	Written Warning	Violation owing to Negligence
		Operational interruptions	1 st time	High	Suspend without pay for a week	Repeat violation – bordering malicious
		Loss of revenue, operational interruptions, brand impact	1 st time	High	Termination	Malicious
7	Unauthorized disclosure of sensitive information	Loss of revenue, operational interruptions, brand impact	1 st time	High	Termination	Malicious
8	Miss representation and false identification in system	Loss of confidential information & breach of trust	1 st time	Medium	Written Warning	Negligence
			2 nd time	Medium	Termination	Malicious