

# Guidelines for Operationalizing Values

## Consequence Management

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## Steps to Operationalize Value Standard Committee

### Step 1: Formation of the Group Values Standard Committee at the Group, Business & Unit Level

The Value Standards Committee should be constituted at Group level, at Business level and at Unit level (where the management cadre employee number exceeds 100). Smaller Units (with less than 100 management cadre employees) would be covered under the next level of Committee. i.e. at the Business level. The role of each Value Standards Committee would be to uphold organization discipline and Group Values.

The **Group Value Standard Committee** would be chaired by the Chairman and shall comprise of 5-6 members (including the Chairman) from ABMC Directors/ Business Heads and Corporate Function Heads. The Committee shall also invite one eminent external public person to be a member to ensure objectivity at the highest level. The Chairman is the outcome owner of the Committee. The Director (HR) is a member of the committee. The secretary of the committee would be appointed by the Chairman.

The **Business Value Standards Committee** shall comprise of 4-5 members (including the Business Head and CHRO) from amongst Unit Heads and Function Heads of the Business. This shall be chaired by the respective ABMC Director/ Business Head. The Business Head is the outcome owner of the Committee. The CHRO is a member of the committee and also the process owner.

The **Unit Value Standards Committee** shall comprise 3-4 function heads and be chaired by the Unit Head. The Unit Head is the outcome owner of the Committee. The UHR Head is a member of the committee and also the process owner.

The Business Head shall appoint the Unit level and Business Level Committee members. The CHRO will ensure that the names of the Business & Unit committee members are effectively communicated to all employees.

**1.1 Nomenclature of the Committee-** The nomenclature of the committee at the Business level shall be: *Business Value Standards Committee: (Name of the Business) & Unit Value Standards Committee: (Name of the Unit)*. E.g. Business Value Standards Committee: Cement and Unit Value Standards Committee: Rajashree Cement.





## 1.2 Points to be considered while appointing the VSC members

The following are the points to be considered while appointing the VSC members (other than the Business Head / CHRO / Unit Head / UHR Head)

- is a role model in living by the ABG Values to whom all the employees would look up to
- has high personal credibility and respect in the system
- is known and perceived to be honest, fair, forthright
- is very keen and enthusiastic about propagating / talking about ABG Values in appropriate internal forums
- is approachable and trust worthy
- has at least 3 years left for retirement

### Step 2: Creation of e-mail id for the employees to send in their complaints

A separate e-mail id will be created by the respective business for the Business level & all the Unit level committees. The nomenclature would be [Businessname.BVSC@adityabirla.com](mailto:Businessname.BVSC@adityabirla.com) OR [Unitname.UVSC@adityabirla.com](mailto:Unitname.UVSC@adityabirla.com). For e.g. the e-mail id for the cement Business will be [Cement.BVSC@adityabirla.com](mailto:Cement.BVSC@adityabirla.com) and for Rajashree cement, it will be [Rajashreecement.UVSC@adityabirla.com](mailto:Rajashreecement.UVSC@adityabirla.com). The e-mail id for the Group Level Committee would be created by OE. This e-mail id would be [group.vsc@adityabirla.com](mailto:group.vsc@adityabirla.com).

### Step 3: Communicating to employees:

The names of the Group, Business & Unit Level Value Standard Committee members along with the e-mail ids of the Group, Business & Unit Level Committees would be communicated by the CHRO to all the employees. The same will be posted by OE on the Value website as soon as the data is shared by the CHRO's

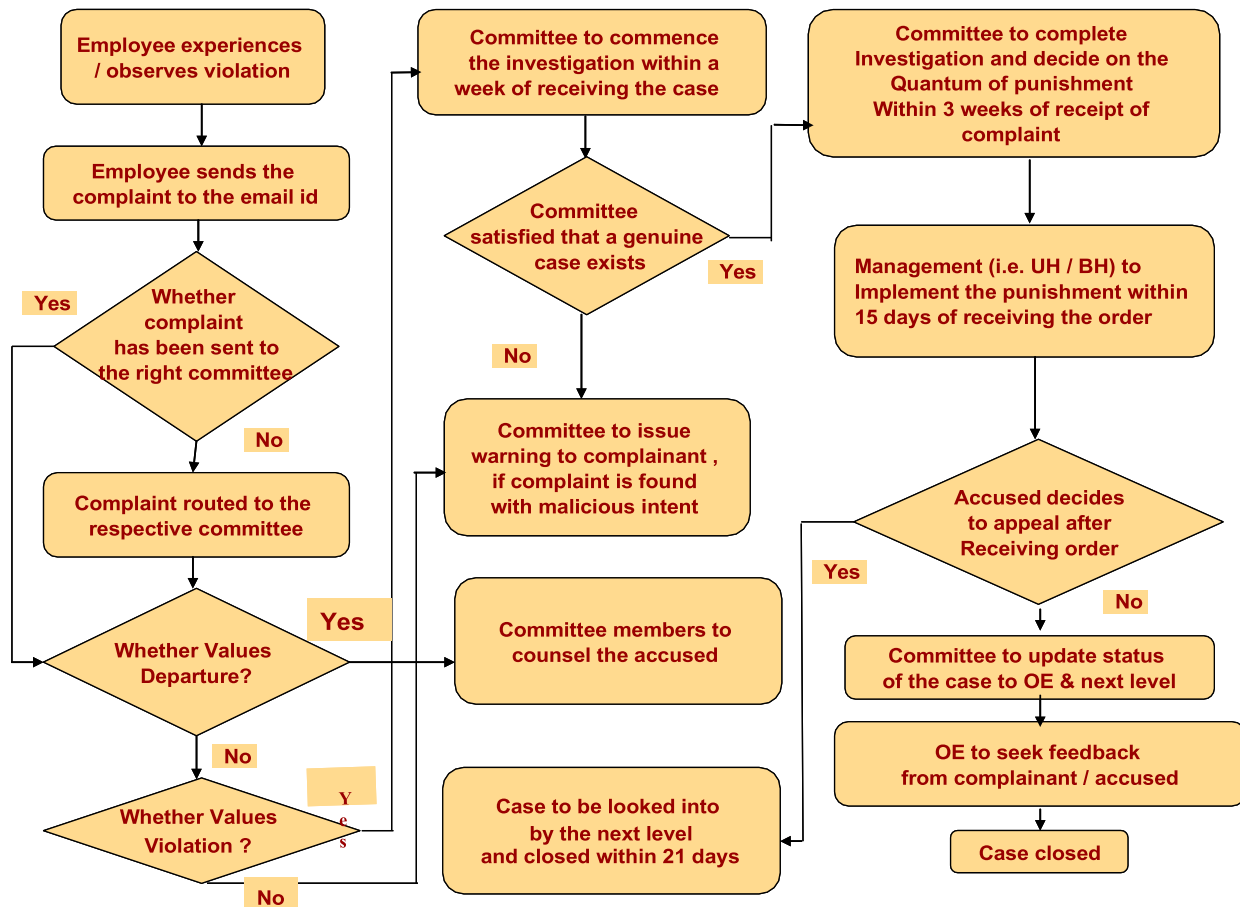




### Step 4: Operating these E-mail IDs

The secretary to the committees will operate these e-mail ids. For the committees at the Business / Unit / Circle level, the CHRO & the Unit / Circle HR Head will be the member secretary of the respective committees. For the Group level committee, the secretary will be appointed by the Chairman.

### Step 5: A Typical process flow of handling a complaint on Values Violation is given below:





- 51 An employee, who identifies non adherence of Code of Conduct or Group Values Standards by another employee or a segment of the organization, will compile information that supports the case. The employee will submit the complaint using the template (sample given) The same will be available in the Values Microsite on Portal.poornata.
- 52 When the Employee sends the complaint to the Group Value Standards Committee, he / she will send it to the committee at the Group/ Business/Unit level depending on:
- The level at which the violation is perceived to be happening, or
  - The seniority of the individuals involved.

If the breach of Code of Conduct or Values is at:

- The Unit Head level and above, the employee will write to the Group level Committee.
  - Function Head Level, the same will be reported to the respective Business level Committee.
  - Any other level, the same will be reported to the respective Unit level Committee.
- 53 When the employee sends a complaint to a committee using the format available on Portal.poornata to the secretary of the committee, the Secretary then checks whether the complainant has sent the complaint to the right committee. For e.g. if an employee sees a Value violation being done by a shop floor manager in a Unit having more than 100 managerial cadre employees, he / she is supposed to send the complaint to the Unit VSC. However, if it has been sent to the Business VSC, then the secretary (in this case the CHRO) will forward it to the relevant Unit Level Committee.
- 54 Once the complaint has been sent to the right committee, the committee will first do a preliminary investigation to check whether the complaint seems to be genuine
- 55 If the committee finds that the complaint is not genuine and the complainant had sent it with a malicious intention, then the committee will send a warning letter to the complainant.
- 56 If the complaint seems to be genuine, the committee will check whether it indicates a Values Departure OR Values Violation.
- 57 If the complaint pertains to a Values Departure, then the committee members will counsel the complainant





- 5.8 If the complaint pertains to a Values Violation, then the committee members will commence their investigation. Depending upon the case, the committee can avail the services of external agencies / internal sources like Management Audit functions, people from Finance background / HR Heads etc.
- 5.9 Under no circumstances, the committee would reveal / disclose the identity of the „accused’ to anyone else (including the immediate manager) – other than all those who are required to know about the case.
- 5.10 During investigation, if the committee concludes that the complaint is not a genuine one and the complainant has sent the complaint with malicious intentions, then the committee will issue a warning letter to the complainant.
- 5.11 The committee will work towards ensuring that the investigation is completed by following the laws of the land and principles of natural justice within 3 weeks of the complaint being reported. If the investigation cannot be completed within 3 weeks, then the committee needs to have very valid and strong reasons for the same. The same needs to be communicated to the Head of the Committee at the next higher level. E.g. if a Business level committee is investigating a case and it feels that the investigation cannot be completed within 3 weeks, then they have to inform the reason to the BH in writing / e-mail during the third week of investigation.
- 5.12 Once the investigation is completed, the committee will decide on the quantum of punishment to be given. While deciding on this, the committee will consider the following:
- Severity of the misconduct
  - Impact on the Organization (Reputation, Financial / Non – Financial)
  - Past record of the employee
  - Past precedence of treating similar violations ( a summary of the same will be kept with OE)
- 5.13 If the charges framed on the accused have been found to be false after investigation, it is very essential to demonstrate that the employee’s dignity is respected. Hence, the Business Head / Unit Head should thank the employee personally for having co-operated in the process. A formal closure letter has to be sent informing that the charges have not been proved during the investigation process. Hence he / she is fully exonerated of all the charges.





- 514 The Committee will prepare a report comprising their findings and their recommendation of punishment. The punishment will shall constitute a minimum of written warning and may be lead to **withdrawal of last increment/ demotion, withholding promotion, dismissal from service and/ or even prosecution in a court of law.**
- 515 Action could also be recommended against employees who abetted the misconduct knowingly. Written warning would also be issued to employees who were “in the know”, but did not highlight the same.
- 516 Once the report is received, the committee will forward it to the respective Management i.e. UH / BH for implementation. The UH / BH has to implement the recommendation within 15 days of receiving the order.
- 517 While implementing the order, the management will ensure that the name of the employee is kept confidential at all times.
- 518 The employee has the option to appeal to the next higher level committee only. If he / she appeals, the decision of this committee will be final and binding.
- 519 If the employee chooses to appeal against the order, he / she has to submit a request in writing to the next higher level of committee within 7 days of receiving the order. If the request is not received within 7 days, the next higher level committee has the option to reject the appeal.
- 520 Based on the request for appeal, the committee will decide whether to re-investigate / relook at the quantum of punishment. However, the next higher level committee will close the case within 21 days of receiving the appeal.
- 521 The CHRO will send a closure report of the case after the punishment has been implemented by the respective management. The template for the closure report is given in page 24.
- 522 The CHRO will also send a quarterly update, comprising the status of the complaints received, to all the employees in the Business with a copy to OE. The template for the quarterly update is given in page 25.

## Step 6: Details about the working of the Committee:

### 6.1: Tenure of the Committee member

**The tenure of the Committee member is 3 years. After 3 years, 1/3 members will retire each year to help maintain continuity and bring fresh and unbiased perspectives. This is however not applicable to the Business Head, CHRO, Unit Head & Unit HR Head.**







The names of the committee members will be put up on the Values Microsite of Portal.poonata. The e-mail ids of each committee will also be displayed.

## 6.2: Quorum of the Committee

There has to be a **minimum of 3 members to form the quorum** in all the Committees at the Group / Business / Unit Level. Of these 3 members, the Business Head & CHRO have to necessarily be present to form the quorum for the Business Level committee. Similarly, the Unit Head & Unit HR Head have to necessarily be present to form the quorum for the Unit Level committee. For the Group Level Committee, the Chairman and Director (HR) have to be present to form the quorum.

## 6.3: Secretary of the Committee

The CHRO is the secretary of the Business Values Standard Committee and the Unit HR Head is the secretary of the Unit Values Standard Committee. The secretary for the Group Values Standard Committee will be decided by the Chairman. The secretary of the committee will have the access to the e-mail id to which the employees will send in the complaints on Values Violation

## 6.4: Roles & Responsibilities of the VSC members

The roles and responsibilities of the VSC members include

- Custodian of Values in their respective Business & Unit
- Extend co-operation towards ensuring that all the complaints on Values violations are investigated within 3 weeks of they being reported
- Respond to the queries on employees on Values dilemmas within 7 days
- Ensure that all the prevailing practices and processes in the Business / Unit comply with the ABG Value standards
- Take initiatives / proactive steps to educate / propagate the ABG Values which in turn would help in Values conformance by the employees through various specific reinforcement mechanisms

## 6.5: Roles & Responsibilities of the CHRO & UHR Head

The CHRO / UHR Head is the secretary of the Business / Unit Values Standard Committee. In order to ensure that the Values consequence Management framework successfully establishes in the Business, the CHRO has to ensure the following.





**Values Consequence Management**

1. All the employees in the Business / Unit have had an induction to ABG Values either by completing the e-learning course on Values or attending a half day / full day Values workshop within the first 3 months of joining, as defined in NEO.
2. All employees sign the revised code of conduct (as appearing in ABMC circular 769) at the time of joining. In case the employees have joined on or before 15<sup>th</sup> April, 2009, the CHRO has to ensure that each such employee have signed the revised code of conduct.
3. The Values Consequence Management Process is effectively communicated to all employees in the Business such that they feel comfortable with the process
4. All the necessary support is extended to the Committee so that all the complaints are investigated within the timeframe of 3 weeks. The CHRO / Unit HR Head has to ensure that all the mandatory procedures, rules & regulations are followed as per the law while investigating the complaint and implementing the punishment.
5. All process / policies in the Business are modified such that it will enable in improving Values conformance by the employees
6. All the committees (Unit / Business) in the Business meet every quarter to
  - a. take stock on the cases that were registered in the previous quarter,
  - b. share experiences and
  - c. suggest changes in the process / policies at the Group / Business level so that it aids in Values conformance by the employees

The quarterly status updates on the complaints received are sent on time to GHR

### **6.6 : Regular Meeting of the Committees**

The VSC at the Group, Business and Unit Level will meet every quarter. It is the role of the secretary to ensure that the committee meets every quarter. The Unit VSC will meet during the first week of the first month of the new quarter to:

- Take stock of the complaints received in the previous quarter
- Finalize the report to be sent to the Business VSC
- Suggest changes in policies / processes to the Business VSC in order to improve Values conformance by the employees in the Unit.





**The Business VSC will meet during** the second week of the first month of the new quarter to

- Take stock of the complaints received by the Business VSC & Unit VSC in the previous quarter
- Finalize the report to be sent to the Group VSC
- Decide on the Business specific changes in policies / processes in order to improve Values conformance by the employees in the Business
- Decide on the suggestions to be given to Group VSC for improving Values conformance by employees at the Group Level

**The Group VSC will meet during** the third week of the first month of the new quarter to

- Take stock of the complaints received by the various committees and the Group VSC
- Decide on the Group wide initiatives to be implemented for improving Values conformance by the employees in the Group
- Provide clarity / direction to Business VSC on dealing with specific cases so that uniformity is maintained

Each of the above committees will also meet as and when necessary in order to ensure that a complaint is investigated within 3 weeks.





## FAQ'S

### Q. What is the Role of Organization Effectiveness team from GHR?

OE Is the custodian and process owner at the Group Level. OE will

- Conduct Audits for ensuring that the guide lines and frame work (principles of natural justice, fairness, transparency) is adhered to while addressing the complaints
- Analyze the cases that have been closed by the Group / Business / Unit Level Committees and then initiate new Group wide policies / practices aimed at improving conformance and adherence to the Code of Conduct, Values Framework etc
- Communicate regularly with all employees of the Group
  - About the Consequence Management Framework and its philosophy
  - Trends on the types of cases handled, if any and its implications and any take corrective actions/ process improvements as required.

### Q. What constitutes Values / Code of Conduct Violation?

A. The Annexure A of the ABMC circular 769 clearly articulates the Code of Conduct all the employees are expected to adhere to. This Code clearly lists the identifiable and non negotiable set of actions/ behavior applicable to all Management cadre employees across the Group.

### Q. Is there a format in which the employees need to submit their complaints on Values Violation? If so, where is it available? When should the employee report about the Violation?

A. The format to submit the Values Violation is available on the Values Microsite on Portal.poornata. The employee should report about the violation as soon as he / she become aware of the same. This should be done within 15 days of the employee being aware of the Values Violation.





**Q. Is it mandatory for the complainant to disclose his / her name while submitting the complaint?**

A. Reporting done by individuals disclosing their names will be attended to first. Anonymous complaints are discouraged and would be considered only in extreme cases.

**Q. Would the names / identity of the complainant / accused be disclosed?**

A. The names / identity of the complainant / accused will not be disclosed at any point in time. The confidentiality and respect for privacy will be maintained at all cost. Those Businesses which have the whistle blower policy should ensure the same is communicated to all employees and the right environment is created.

**Q. What is the language in which the employee has to submit the complaint?**

A. It would be preferred if the employee submits the complaint in English. This is because, if the complaint is submitted in any other language, then it will first have to be translated into English before commencing the investigation and hence would delay the process.

**Q. Where should the employee send the complaint on Values Violation?**

A. If the breach of Code of Conduct or Values is at:

- The Unit Head level and above, the employee should write to the Group level Committee.
- Function Head Level, the same should be reported to the respective Business level Committee.
- Any other level, the same should be reported to the respective Unit level Committee.

The names of the Committee members along with the e-mail ids of the VSC at the Group, Business & Unit Level are available on the Values microsite of Portal.poornata.

**Q. Who will create the e-mail IDs for the Value Standard Committees?**

A. OE will create the e-mail ids for the Group VSC. The Business will create the e-mail id for the Business & Unit VSC as per the nomenclature given.





**Q. What will happen if a committee member separates from the current Business / Unit?**

A. If a committee member separates from the Business / Unit on account of resignation / retirement, then the CHRO has to ensure that a new committee member is appointed. This appointment should happen within 15 days of the separation of the committee member. The CHRO should inform all the employees in the Business & OE about the new member immediately after his / her appointment.

If a committee member gets transferred from one Business / Unit to another Business / Unit, then it is the prerogative of the BH to decide whether he / she has to be appointed as a committee member in the new Business / Unit.

**Q. What will happen if the complaint given by an employee turns out to be false and malicious in intent?**

A. If the case is false and malicious in intent, the reporting employee would be held guilty of misconduct and appropriate action shall be taken. However, the VSC shall distinguish between mistaken reporting and malicious intent of the employee

**Q. I have a suspicion that there is a violation happening although I do not have concrete evidence of the same. Can I still send in my complaint?**

A. You can still send in your complaint. Please mention that you do not have any concrete evidence of the violation in your complaint and you want the committee to probe further.

**Q. What are the steps after an employee has submitted a complaint on Values violation?**

1. Once an employee has submitted a complaint to the Values Committee, the committee will first go through it to find out whether the complaint has been addressed to the appropriate level. For e.g. if the Group Values Standard Committee receives a complaint about an engineer in a Unit, then they would forward the complaint to the respective Unit Level committee (if it exists). Else, they will forward it to the respective Business Level Committee for further action.





2. The respective Group Value Standards Committee shall investigate the issue confidentially through its sources such as the Unit Head/ HR / Management Audit functions and if need be engage an external agency to investigate the facts of the case. While investigating, the Committee shall always follow the Principles of Natural Justice.
3. The identity of the employee reporting the issue shall be kept confidential at all times.
4. Based on the above investigations, the Committee shall recommend the action to be taken against the deviant employee/s. The penal action shall constitute counseling of the employee to a minimum of written warning and may also include **withdrawal of last increment/ demotion, withholding of last promotion, dismissal from service and/ or even prosecution in a court of law.**
5. Action would also be recommended against employees who abetted the misconduct knowingly. Written warning would also be issued to employees who were “in the know”, but did not highlight the same.
6. The management i.e. the Unit Head, the Business Head at the respective level shall implement the recommended action immediately, (i.e. within 15 days). It shall however not publicize the name of the employee/s found guilty, to maintain the dignity of individuals at all times.

**Q. What happens if the issues brought forward to the Value Standards committee is related to Sexual Harassment?**

- A. The secretary of the committee will forward the complaint to the respective Complaints Committee for further investigation. The details about how the Complaints Committee will take up the case is elaborated in a separate note.

**Q. What are the points to be considered by the Committee before deciding on the quantum of punishment?**

- A. The Committee will consider the following points:
- Severity of the misconduct
  - Impact on the Organization (Financial / Non – Financial)
  - Past record of the employee
  - Past precedence of treating similar violations





**Q. Can an employee appeal against the punishment given to him / her by the Committee?**

A. Yes, the employee can appeal against the punishment. The principal of natural justice will apply and everyone will get a chance to voice their disagreement on the issue. However he / she can appeal only to the next higher level committee. The decision of the next higher level committee shall be final and binding on the employee. For e.g. if an employee was given punishment by the Unit Level Committee, then he / she can appeal only to the Business Level Committee. This Committee will then decide on how to proceed with the case i.e. the committee will decide whether to re-investigate the case, reduce the quantum of punishment give etc. The decision of this committee shall be final and binding.

**Q. What is the difference between Values Departure & Values Violation?**

A. Whenever an employee does not live by the Values, it can be termed as a Values Departure OR Values Violation depending upon the intent & magnitude of the impact. If the employee deliberately does not abide / live by the Values despite knowing that it is not correct on his / her part to do so, it can be termed as a Values Violation. In such cases, the magnitude of the violation is not critical. For e.g. if an employee fudges a bill for Rs. 10/-, it is a Values Violation since the employee has fudged it despite knowing that this is against the Values of the organization. In such cases, the magnitude i.e. Rs. 10/- does not hold importance as the intention of the employee was to cheat the organization.

If an employee does not live by the Value on account of oversight or because there were not enough checks & balances in the system, then it would be considered as Values Deviation (provided the impact / magnitude are not huge). However, if the impact is huge (e.g. huge financial loss for the organization, loss of image etc), this would be treated as Values Violation. It is the management's prerogative to decide whether it is Values Violation or Departure. For e.g. if an employee takes official stationery (e.g. pen) home inadvertently, it can be termed as Values Violation where the intention was not to cheat the organization. This is a grey area and this is where the collective wisdom of the committee will rule.







**Q. An employee has a Values Dilemma. Whom should he / she write to for getting clarity?**

- A. The employee should write to the Values Dilemma Help Desk. This Help Desk will be managed by OE. While submitting the dilemma, the employee has to reveal his / her identity along with the official e-mail id. The template for submitting the dilemma will be available on the Values Microsite. Once the employee submits the dilemma, the OE team would be notified by an e-mail. The OE team will then forward the dilemma to the respective Values Standard Committee. For e.g. if an employee from Rajashree Cement sends a dilemma, then the OE team will forward it to the Business/ Unit VSC depending upon the level of the employee. The secretary of the committee has to ensure that this dilemma is responded to within 7 days of the query being raised. The committee will respond by sending a reply to the employee. A copy of this response will be marked to OE. Please refer to Annexure 1 to know more about Values Dilemma and the steps to resolve them.





## Annexure 1: Values Vs Ethics

### Q. What are Ethics?

Ethics are the guiding factors that help an individual to distinguish between the „right“ and the „wrong“. Ethics refers to a set of norms and morals that govern human action and inform what we ought or should do.

### Q. What are Values?

Values are the convictions, beliefs and principles that an individual has and which are the very basis or foundation of his existence. Values are the guiding force that helps in solving any crisis by directing towards the „right“ course of action. In ABG, Values represent the collective conscious of the top leadership (both legacy & present) of the organization. They form the moral contract between the employees & the organization.

### Q. What is the link between Ethics and values?

Values are the beliefs, convictions and principles of a person or an organization which form the basic building blocks of any organization. **Values** are the embodiment of what an organization stands for, and should be the basis for the behavior of its members. Values provide the basis for judgments about what is important for the organization to succeed in its core Business.

Ethics is concerned with how a moral person should behave, whereas values simply concern the various beliefs and attitudes that determine how a person actually behaves. Simply put, ethics involves learning what is right or wrong, and then doing the right thing -- but "the right thing" is not easy to choose since Business activity demands that we select from alternatives that are neither wholly right nor wholly wrong. The following table explains the difference between Values & Ethics.

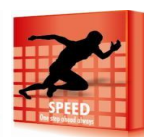
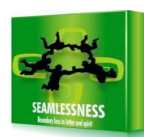




ADITYA BIRLA GROUP

Values Consequence Management

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VALUES	ETHICS
Define the individual	Translate values into action
Is constant	Keep changing
Internally derived	Externally determined
Virtue - oriented	Justice – oriented
General	Specific
Stated morally	Shared behaviorally
Judged as good or bad	Judged as present or absent
Set priorities	Set boundaries

Source: [http://www.reslife.net/html/so-now\\_0802c.html](http://www.reslife.net/html/so-now_0802c.html)

### Q. What is link between Value and Ethical Dilemma?

A Value dilemma occurs when one is in a situation such that an action taken by the individual may violate one or more values of the organization.

An ethical dilemma occurs when one is not able to decipher the difference between right and wrong since one is often forced to choose between alternatives which are neither wholly right nor wholly wrong. Each alternative has the potential to compromise on one Value/s as against the other. **Hence ethical dilemma is the conflict between competing values.**

Put in other words, **“All Ethical dilemmas are Value dilemmas but all Value dilemmas are not Ethical dilemmas”** Hence the basis of resolving an ethical dilemma is the set of Value that govern the organization. Thus the framework given below to resolve ethical dilemmas can be used by the Group Values Standard Committee to resolve Values dilemmas as well.





## Steps involved in resolving an ethical / Value dilemma

The following steps are involved in resolving an ethical / Value dilemma;

### Step 1: Awareness & Acceptance:

As an initial step, the committee must become aware of the ethical / Value dilemmas and evaluate the extent to which the existing policies / procedures in the organisation attend to these ethical/value issues. In this phase the committee must accept the fact that a dilemma does exist. The Questions a leader could consider could be: “According to our mission and our value statement, who are we accountable to?”

One way to frame this stage of consideration includes the ability of leaders to assess the extent to which the organization aligns itself with the existing laws, the ethical norms shared by other similar organizations, and the moral obligations that it claims to hold regarding individual and community stakeholders (cf. Freeman, 2002).

### Step 2: Self Reflection

The second step is to seek out different points of view and then to decide what is right at a given time and place, in a particular set of relationships and circumstances. This involves two sub-processes. **The first sub process** in doing this is to do a thorough analysis of the ethical/ value dilemma. The Group Values Standard Committee may use the 10 step method given below to analyze the ethical dilemma and come out with options to resolve the dilemma. This framework has been provided by Twin Cities-based consultants, Doug Wallace and Jon Pekel.





STEPS	NOTES		
1. What are the known FACTS in the situation?			
2. Who are the key STAKEHOLDERS, what do they value and what are their desired outcomes?			
3. What are the UNDERLYING DRIVERS causing the situation?			
4. In priority order what ethical principles or operating values do you think should be upheld in this situation?			
5. Who should have input to, or be involved in, making this decision?			
6. List any alternative and action plans that would: a) prevent or minimize harm to stakeholders b) uphold the priority values for this situation c) be a good solution to the situation	Alternative 1	Alternative 2	Alternative 3
7. Build a WORSE-CASE SCENARIO for your preferred alternative to see how it affects the stakeholders. Rethink and revise your preferred alternative if necessary.			
8. Add a PREVENTATIVE ETHICS component to your action plan that deals with the underlying drivers causing the situation listed in Step 3.			
9. Evaluate your chosen decision and action plan against the checklist given in the next page.			
10. Decide and build an action plan, and implement and monitor it.			

Source of this framework: <http://managementhelp.org/ethics/ethxgde.htm>

**The second sub process is to** evaluate the decision and the action plan that they have arrived at (using the 10 step method given below) using the ethical checklist given below. Based on the results, the committee may decide to change / revise the decision and the action plan.





**Ethical Checklist**

Circle the appropriate answer on the scale; "1" = not at all; "5" = totally yes					
1. <b>Relevant Information Test.</b> Have I/we obtained as much information as possible to make an informed decision and action plan for this situation?	1	2	3	4	5
2. <b>Involvement Test.</b> Have I/we involved all who have a right to have input and/or to be involved in making this decision and action plan?	1	2	3	4	5
3. <b>Consequential Test.</b> Have I/we anticipated and attempted to accommodate for the consequences of this decision and action plan on any who are significantly effected by it?	1	2	3	4	5
4. <b>Fairness Test.</b> If I/we were assigned to take the place of any one of the stakeholders in this situation, would I/we perceive this decision and action plan to be essentially fair, given all of the circumstances?	1	2	3	4	5
5. <b>Enduring Values Test.</b> Does this decision and action plan uphold my/our priority enduring values that are relevant to this situation?	1	2	3	4	5
6. <b>Universality Test.</b> Would I/we want this decision and action plan to become a universal law applicable to all similar situation, even to myself/ourselves?	1	2	3	4	5
7. <b>Light-of-Day Test.</b> How would I/we feel and be regarded by others (working associates, family, etc.) if the details of this decision and action plan were disclosed for all to know?	1	2	3	4	5
8. <b>Total Ethical Analysis Confidence Score</b> . Place the total of all circled numbers here.					
How confident can you be that you have done a good job of ethical analysis?					





7-14	Not very confident
15-21	Somewhat confident
22-28	Quite confident
29-35	Very confident

Source of this framework: <http://managementhelp.org/ethics/ethxgde.htm>

While resolving ethical/ Value dilemmas, the committee might come across situations when a decision has to be made when all the relevant information is not available / cannot be known. Similarly, questions that press for answers have no established and correct solutions.

In such situations, the committee must not get bogged down by the existing mental models, policies & practices. Instead they need to question existing mental models, rather than making a decision within the existing models. Moreover, the more novel and unique the dilemma is, the more is the need to rely on discussion and dialogue with others about the dilemma. Only by careful exploration of the problem, aided by the insights and different perspectives of others, can the committee make good ethical choices in such situations.







## Annexure 2

# Template for Reporting Violation of Values / Code of Conduct

**To: The Group Values Standard Committee**

**Violation details:**

- a. Which aspects of the Code of Conduct or Group Values have been violated?
- b. Who is /are the individual/ people/ functions involved?

**Critical Incidents and Factual Data:**

- a. Please describe what constitutes the violation i.e. incident details.
- b. List supporting information/ data that you would have, that the Committee can seek from you while investigating. In case you do not have any concrete / specific evidence of the violation, but you „feel“ that a violation has taken place, please state so.

Date: \_\_\_\_\_

Location: \_\_\_\_\_

Name of the Person reporting: \_\_\_\_\_

Contact Information: \_\_\_\_\_

(Mention official e-mail id / cell no)

*Note: Reporting done by individuals disclosing their names will be attended to first. Anonymous complaints are discouraged and would be considered only in extreme cases.*





## Format of closure report

Closure report to be sent by CHRO to OE (after every case has been closed)	
Case No	08-11-COC-01
Name of the employee who has forwarded the complaint along with name of the Unit, Business	Mr. XYZ,
Business	Cement
Unit	Rajashree Cement
Nature of case (Sexual Harassment / Violation of Values / Code of Conduct)	Code of Conduct
Complaint against - name of the employee, Designation, name of Unit / Business and e-mail id	Mr. ABC, Rajashree Cement
Date of receiving the complaint from OE	1st Nov, 2017
Complaint in brief (as forwarded by the employee) not more than 50 words	ABC had purposely shared the organisation structure and Business model to the competitor - for consideration
When did the investigation commence (Please mention the date)	5th Nov, 2008
When did the investigation complete (Please mention the date)	15th Nov, 2008
Name of the members in the Investigation Committee	Mr. Sourabh Misra, MR. CB Tiwari, Mr.XYZ...
Date of the Steering Committee receiving the Investigation report from the Investigation Committee	18th Nov, 2017
Have the charges against the accused been proved	Yes
Date of the punishment order from the Steering Committee	21st Nov, 2017
Describe the punishment order in brief	The employee should be terminated from the services
When was the punishment order implemented by the Business / Unit	30th Nov, 2017
Any learnings from the case which the organization can use in order to improve its internal systems and processes	We need to relook at the IT security policy so that employees are not able to illegally take the official data outside the premises

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(Signature of the CHRO)





## Format of the Quarterly Report

E.g. Status for the period (Jan - March, 2018)

	Sexual Harassment	Values / Code of Conduct Violation	Total
No of cases received in the Quarter (Jan - Mar 2018)			
No. of cases carried forward from the quarter (Oct - Dec, 2017) which were not closed			
Total Open Cases for the quarter			
No. of cases of the quarter (Jan - March, 2017) which have been closed			
No. of cases of the quarter (Oct - Dec, 2017) which have been closed			
Total Cases closed for the quarter			
Total cases not closed at the end of the quarter (Oct - Dec, 2017)			

The CHROs would use the above format to send updates to all the employees in the Business and to OE

