

# **CENTRALIZED RECRUITMENT POLICY**

**(APS HYDRO PVT. LTD.)**

## **1. PURPOSE**

This Centralized Recruitment Policy establishes a structured, transparent, and centrally governed framework for manpower planning, internal deployment, and external recruitment across the Head Office (New Delhi) and all Project Offices of the Company.

The primary objective of this policy is to ensure that human resources are optimally utilized, efficiently deployed, and judiciously expanded, in alignment with the Company's operational requirements, financial prudence, and statutory compliance obligations.

In particular, this policy is designed to:

- a) **Institutionalize Centralized Control:** Establish a uniform and centralized recruitment system under the supervision of the Head Office HR Department, thereby eliminating decentralized or unauthorized hiring practices at project levels.
- b) **Ensure Optimal Utilization of Existing Manpower (Transfer-First Approach):** Mandate a systematic evaluation of internal manpower availability across all projects and offices before initiating any external recruitment, ensuring effective redeployment of available personnel and minimizing idle or surplus workforce.
- c) **Standardize Manpower Planning Across Projects:** Create a consistent and documented process for manpower requisition, assessment, approval, and deployment, enabling better coordination between Head Office and Project Offices.
- d) **Maintain Financial Discipline and Budgetary Control:** Ensure that all hiring decisions are aligned with the project budgets and organizational financial planning, thereby preventing unnecessary cost escalation due to unplanned recruitment.
- e) **Enhance Operational Efficiency and Project Continuity:** Facilitate timely availability of qualified personnel at project sites through a balanced approach of internal transfers and controlled recruitment, including provisions for emergency hiring in critical situations.
- f) **Ensure Legal and Regulatory Compliance:** Align recruitment practices with applicable labour laws in India, including requirements relating to employment documentation, wage structures, social security, and workplace safety.
- g) **Prevent Duplication and Uncontrolled Expansion of Workforce:** Avoid redundant hiring by ensuring that manpower requirements are critically evaluated, justified, and approved through defined authority levels.
- h) **Strengthen Inter-Project Resource Optimization:** Enable strategic allocation and redistribution of skilled manpower across multiple projects based on workload, project timelines, and organizational priorities.
- i) **Support Long-Term Organizational Planning:** Provide a foundation for systematic workforce planning, succession planning, and capability building aligned with the Company's growth in infrastructure, highway, and hydro power sectors.

This policy shall serve as the **authoritative guideline** for all recruitment and manpower deployment decisions within the Company and shall be binding on all departments, project offices, and officials involved in the hiring process.

## 2. SCOPE

This policy shall apply uniformly across the entire organization and shall govern all manpower planning, transfer, and recruitment-related activities undertaken by the Company, whether at the corporate level or across various project locations.

### 2.1 This policy is applicable to:

- **Head Office (H.O., New Delhi):** All departments, divisions, and functional units operating from the Head Office shall be governed by this policy. The **H.O. HR Department** shall act as the **nodal authority** for implementation, monitoring, and enforcement of this policy.
- **All Project Offices (Project-wise locations):** All project offices, irrespective of their geographical location, size, or duration, shall mandatorily comply with this policy. Project Offices shall:
  - Initiate manpower requirements through defined requisition procedures
  - Route all hiring requests through the designated project authority to H.O. HR.

### 2.2 Applicability to Categories of Personnel

This policy shall cover all categories of personnel engaged by the Company, either directly or indirectly, including internal transfer decisions and deployment instructions issued by Head Office. All categories of personnel includes:

**(a) Permanent Employees:** Employees appointed on the regular rolls of the Company without a fixed tenure.

**(b) Fixed-Term Employees:** Employees engaged for a specific duration, aligned with project timelines and/or contractual requirements, subject to transfer or reassignment based on project needs, wherever feasible / required.

**(c) Consultants / Retainers:** Individuals engaged in an Advisory, Technical, or Specialized capacity, either part-time or full-time. The Terms of engagement shall be governed by separate contractual agreements.

**(d) Contract Labour (Through Contractors) – Limited Scope:** Contract labour engaged through third-party contractors shall be governed as follows:

- This policy shall apply only to the extent of manpower requisition for specified purpose, period and approval process.
- Project Offices shall submit requirements specifying the nature of work, number of workers and proposed contractors (if any).
- The actual engagement, deployment, and compliance of contract labour shall be governed by applicable laws and contractual arrangements with contractors.

- The Contractor must ensure to the compliance with applicable labour regulations, including those under Code on Social Security, 2020, and Occupational Safety, Health and Working Conditions Code, 2020.

### 2.3 Functional Applicability

This policy shall be binding on:

- Head Office HR Department
- Functional Heads / Department Heads
- Project Heads and designated project officials
- Any employee or authority involved in manpower planning, approval, or recruitment

No department or project shall undertake any recruitment, engagement, or manpower deployment **outside the framework of this policy**, except as specifically permitted under the emergency provisions defined herein.

### 2.4 Exclusions (If Any)

- Daily wage labour engaged directly for short-term, incidental work (if permitted under applicable law and company policy) may be treated separately.
- Specialized statutory or contractual engagements mandated by clients or government authorities may be handled as exceptions, subject to approval by Head Office Authority.

### 2.5 Binding Nature

This policy shall be **mandatory and enforceable** across all locations and categories covered herein. Any deviation, bypass, or non-compliance shall be treated as a violation of company policy and may attract disciplinary action.

## 3. GOVERNING FRAMEWORK

This Centralized Recruitment Policy shall be implemented in strict alignment with the applicable labour law framework in India. The Company shall ensure that all manpower engagement practices comply with the following statutory provisions:

- Code on Wages, 2019
- Code on Social Security, 2020
- Occupational Safety, Health and Working Conditions Code, 2020

These legislations collectively govern the fundamental aspects of **wages, social security, and workplace safety**, and shall form the legal foundation of this policy.

In the event of any amendments, notifications, or rules issued under the above Codes, the Company will update its recruitment practices without any notification and this policy accordingly to remain deemed to be compliant with prevailing laws. In case of any inconsistency between this policy and applicable labour laws, the provisions of the relevant law shall prevail.

## 4. KEY PRINCIPLES

The following key principles shall form the foundation of this Centralized Recruitment Policy and shall be strictly adhered to by all departments, project offices, and authorities involved in manpower planning, deployment, and recruitment.

- a) **Centralized Recruitment Control:** All recruitment activities shall be centrally controlled, administered, and executed by the Head Office HR Department.
- b) **Transfer-First Approach (Mandatory):** Company will adopt a mandatory “Transfer-First” approach, wherein internal manpower availability shall be mandatorily assessed and utilized before initiating any external recruitment.
- c) **Optimal Resource Utilization:** The Company shall ensure efficient and judicious utilization of available manpower across projects and must be redeployed before new recruitment is approved.
- d) **Project Continuity with Compliance:** To balance **operational urgency at project sites**, emergency hiring may be permitted with post-facto approval to avoid disruption of project activities.
- e) **Overarching Principle:** All the above principles shall be read together and implemented in a manner that ensures Centralized control, Transparency and accountability, Efficient utilization of human resources and Continuity of project operations without compromising governance.

These principles shall be **binding on all stakeholders** and shall guide all recruitment and manpower-related decisions within the Company.

“Stakeholders” shall mean all individuals, roles, and authorities involved in the implementation, execution, approval, or compliance of this policy, including but not limited to:

- Head Office HR Department
- Department / Functional Heads
- Project Heads and Designated Project Officers
- Project / Site HR personnel
- Contractors / Vendors (in respect of contract labour)

All such stakeholders shall be bound by the provisions of this policy and shall act within the scope of authority and responsibility assigned to them.

## 5. AUTHORITY MATRIX

This section defines the **delegation of authority, approval hierarchy, and control mechanisms** governing all recruitment, transfer, and manpower deployment decisions within the Company. The objective is to ensure **centralized control, accountability, financial discipline, and audit traceability**.

### 5.1 Final Hiring Approval Authority

#### 5.1.1 Head Office Controlled Recruitment:

The final authority for all recruitment decisions shall vest jointly with HR Head (Head Office), and Functional Head.

No recruitment (including issuance of offer letter or engagement confirmation) shall be finalized without the **explicit approval of both authorities**.

**5.1.2 Scope of Approval:** The above approval shall cover:

- External recruitment of all categories of employees
- Engagement of consultants and retainers
- Approval of compensation within or beyond budget
- Approval of deviations from standard recruitment process
- Approval of exceptions to transfer-first policy

**5.1.3 Project-Level Authority (Conditional):** For project-specific manpower requirements:

- The **Project Head** shall have authority to **initiate and recommend hiring** within the project budget.
- Such recommendations shall **not constitute final approval** and shall be subject to **mandatory ratification by Head Office Authority**.

**5.1.4 Emergency Hiring Approval**

In urgent situations:

- The **Project Head** may initiate hiring within defined emergency timelines (48–72 hours) under the policy guidelines.
- However, such hiring shall be:
  - Immediately reported to HO HR
  - Subject to **post-facto approval by HR Head Office Authority**

Failure to obtain ratification may result in nullification of hiring and disciplinary action.

**5.1.5 Non-Delegable Authority**

The authority to grant final hiring approval:

- Shall not be delegated below the level of HR Head, General Manager (Projects) and Functional Director
- Shall remain centralized to maintain control and compliance.

**5.2 Recruitment Control Authority**

**5.2.1 Centralized Execution by Head Office HR:** All recruitment-related activities shall be centrally executed, delegated, administered and controlled by the Head Office HR Department, including:

- Candidate sourcing (internal and external)
- Screening and shortlisting
- Interview coordination and evaluation
- Background verification
- Compensation structuring
- Offer issuance and onboarding coordination

**5.2.2 Uniform Recruitment Standards:** HO HR shall ensure:

- Standardized recruitment procedures across all locations
- Consistency in candidate evaluation criteria
- Compliance with applicable labour laws and company policies
- Maintenance of proper documentation and audit records

**5.2.3 Role of Project Teams:** Project teams shall have a supportive and advisory role in the recruitment process.

**Permitted Functions:**

- Providing technical job requirements and specifications
- Participating in interviews and technical assessments
- Assisting in preliminary shortlisting (if requested by HO HR)
- Providing feedback on candidate suitability for project conditions

**Limitations:**

- Project teams shall not independently source, select, or appoint candidates
- Any shortlisting done at project level shall be subject to validation and approval by HO HR

**5.2.4 Internal Transfer Control**

- Identification and approval of internal transfers shall be exclusively controlled by HO HR
- Project teams shall comply with transfer decisions as per policy
- No project shall retain or release employees without HO HR approval

**5.2.5 Documentation and Audit Control:** For a limited period only, HO HR shall maintain complete records of:

- Manpower Requisition Forms (MRF)
- Recruitment Approval Notes (RAN)
- Candidate evaluation sheets
- Approval communications

These records shall serve as official evidence for audit, compliance verification, and dispute resolution.

**5.3 Overriding Provision**

- Any recruitment or engagement undertaken outside the authority matrix defined herein shall be deemed unauthorized and invalid.
- Such actions may result in Disciplinary proceedings, Financial accountability, Reversal or termination of such engagements.

**5.4 Guiding Principle:** The Authority Matrix shall operate on the principles of:

- Centralized control with defined delegation
- Transparency and accountability in decision-making
- Strict adherence to transfer-first policy
- Alignment with organizational and financial objectives

This matrix shall be binding on all stakeholders and shall be strictly enforced across the Company.

## **6. MANPOWER REQUISITION PROCESS**

### **6.1 Initiation at Project Level**

- Project officials shall identify manpower requirements
- Requirement shall be submitted to the designated officer at project level
- The designated officer shall forward the requisition to HO HR

## **6.2 Mandatory Contents of Requisition**

- Position title
- Number of positions
- Project location
- Job description
- Required qualifications and experience
- Budgeted salary
- Justification for requirement

## **7. INTERNAL TRANSFER MECHANISM (MANDATORY)**

**7.1 Internal Availability Check:** Upon receipt of requisition, HO HR shall:

- Review availability of employees across all projects
- Identify suitable personnel for redeployment

**7.2 Binding Nature of Transfer:**

- Transfer shall be treated as the first and mandatory option
- Project teams shall not reject transferred employees

**7.3 Exception Clause:** In exceptional circumstances:

- Project Authority may submit justification for non-acceptance
- Final decision shall rest with HO HR Head + Functional Director

**7.4 Long-Term Resource Planning:** HO HR shall ensure:

- Balanced manpower distribution across projects
- Avoidance of surplus or idle manpower

## **8. EXTERNAL RECRUITMENT PROCESS**

External hiring shall be initiated only when:

- No suitable internal resource is available, or
- Internal transfer is not feasible

### **8.1 Recruitment Steps**

1. Job description finalization
2. Candidate sourcing (handled by HO HR)
3. Screening and shortlisting
4. Interview process
5. Final selection and approval
6. Offer issuance

### **8.2 Submission of request with Employment exchange**

In order to ensure compliance with applicable statutory requirements and to promote transparency and equal employment opportunity, the Company shall undertake recruitment intimation and coordination with the appropriate Employment Exchange, wherever applicable.

### **8.2.1 On receipt of manpower requisition:**

- The Head Office HR Department shall:
  - Identify positions requiring notification
  - Submit vacancy details to the appropriate Employment Exchange
  - Maintain records of such submissions
- No Project Office or department shall independently interact with the Employment Exchange without prior approval of HO HR.
- Notification shall be made within the stipulated time.

### **8.2.2 Consideration of Sponsored Candidates**

- Candidates sponsored by the Employment Exchange shall be duly considered by HO HR.
- Such candidates shall undergo the same evaluation process as other applicants.

#### **However:**

- The Company shall retain full discretion in selection based on merit, suitability, and organizational requirements.
- Notification to Employment Exchange shall not create any obligation to select candidates sponsored by it.

## **9. CONTRACT LABOUR ENGAGEMENT**

- Project teams shall submit requirements for contract labour
- Available contractor options shall be included
- Purpose, rates, duration in align with project cost must be provided by Project team
- Engagement shall comply with applicable labour regulations
- Final oversight shall remain with HO

## **10. EMERGENCY HIRING PROVISION**

### **10.1 Applicability:** Emergency hiring may be permitted in cases of:

- Urgent project requirements
- Critical manpower shortage affecting execution

### **10.2 Process**

- Project Head may initiate hiring within 48–72 hours
- Immediate intimation to HO HR is mandatory

### **10.3 Post-Facto Approval**

- All emergency hires must be submitted for HO ratification
- Failure to obtain approval may lead to nullification of engagement

## **11. DOCUMENTATION & RECORDS**

All Records shall be maintained centrally by HO HR. These records include all recruitment actions, including Manpower requisition, Internal transfer evaluation, Interview records, Approval notes, Offer letters, Appointment letters etc.

## **12. COMPLIANCE & AUDIT**

- All recruitment must comply with applicable labour laws
- Periodic audits shall be conducted by HO HR
- Unauthorized hiring shall be treated as a policy violation

### **13. POLICY VIOLATION**

This policy is mandatory and binding on all stakeholders. Any deviation or non-compliance shall be treated as a policy violation and may attract disciplinary and administrative action.

#### **13.1 Instances of Violation**

The following shall constitute violations:

- Unauthorized hiring without approval of Head Office HR and Functional Director
- Bypassing the transfer-first mechanism or failure to assess internal availability
- Non-compliance with documentation, including MRF, RAN, and approval records
- Misrepresentation or suppression of facts relating to manpower requirement or urgency
- Improper use of emergency hiring provisions without justification or post-facto approval

**13.2 Consequences:** Depending on severity, actions may include:

- Cancellation of unauthorized hiring
- Warning or disciplinary action
- Fixing of financial responsibility, where applicable

**13.3 Accountability:** All stakeholders shall be responsible for compliance within their roles. Project Heads and Functional Heads shall ensure no deviation occurs under their authority.

**13.4 Overriding Provision:** No operational urgency shall justify deviation from this policy, except as permitted under defined emergency provisions with mandatory approval.

### **14. EFFECTIVE DATE & AMENDMENT**

This policy shall come into effect from **01.04.2026** and shall remain in force until amended. The Company reserves the right to amend or modify this policy at any time based on operational or legal requirements.

## **4. LEGAL DEFINITIONS**

For the purpose of this Centralized Recruitment Policy, the following terms shall have the meanings assigned to them below. These definitions are intended to ensure clarity, consistency, and legal enforceability of the policy across all offices and project locations.

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### **4.1 “Company”**

“Company” shall mean **APS Hydro Pvt. Ltd.**, including its Head Office at New Delhi and all its project offices, sites, units, and establishments, whether existing or established in the future.

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### **4.2 “Head Office (HO)”**

“Head Office” shall mean the registered or corporate office of the Company located at New Delhi, which functions as the central authority for:

- Human Resource management
- Recruitment control and approvals
- Policy implementation and compliance

### **4.3 “Project Office / Project Site”**

“Project Office” or “Project Site” shall mean any temporary or permanent site, office, or establishment set up

### **4.4 “Stakeholders”**

“Stakeholders” shall mean all individuals, roles, and authorities involved in the implementation, execution, approval, or compliance of this policy, including but not limited to:

- Head Office HR Department and HR Head
- Department / Functional Heads
- Project Heads and Designated Project Officers
- Project / Site HR personnel
- Contractors / Vendors (in respect of contract labour)

All such stakeholders shall be bound by the provisions of this policy and shall act within the scope of authority and responsibility assigned to them.

**APPROVED BY:**

**Management – APS Hydro Pvt. Ltd.**