



OIL & NATURAL GAS CORPORATION (W.O.U.) KARMACHARI SANGHATANA

AFFILIATED TO - PETROLIUM & GAS WORKERS' FEDERATION OF INDIA

Reg. No. (By - II - 8268)

Tel. : 022-26274102

Flat No.102, 1st Floor, Acme Harmony-I, Poonam Nagar, Off. JV Link Road, Andheri (E), Mumbai - 400 093.

Website : www.ksmumbai.com

REF. : ONGC/KS/ 75/2025

DATE : 29/08/2025

To,

Shri. Narendra Modi Ji,

Hon'ble Prime Minister of India,
Prime Minister's Office,
South Block,
New Delhi- 110 011.

Shri. Dr. Mansukh Mandaviya,

Hon'ble Minister - Ministry of Labour & Employment,
Government of India,
Shram Shakti Bhawan, Rafi Marg,
New Delhi-110 001.

Shri Hardeep Singh Puri Ji,

Hon'ble Minister - Ministry of Petroleum & Natural Gas (MoPNG),
Government of India,
Shastri Bhavan,
New Delhi - 110001

Subject: Complaint regarding discriminatory Compensatory Off & Overtime policy in ONGC (Office Order No. DDN/CORP-ER/ESTT-POLICY/2025/CoffoT/2600682 dated 07.08.2025)

Respected Sir,

We write to lodge a formal complaint about the new **Compensatory Off & Overtime policy** issued by the Oil and Natural Gas Corporation (ONGC) via Office Order No. DDN/CORP-ER/ESTT-POLICY/2025/CoffoT/2600682 dated 07.08.2025. This policy, **approved in the 663rd meeting of ONGC's Board (MCoD) on 16th July 2025 in New Delhi**, contains guidelines that **discriminate against staff-level employees** & are applied inconsistently across different duty patterns. We are deeply concerned that these guidelines deny legitimate compensatory off (C-off) & overtime (OT) entitlements to non-executive staff in many practical work situations. Below, we outline the key issues & unfair provisions in this policy, & we seek your urgent intervention to review & rectify the same in the interest of justice & in accordance with labour laws.

Key Issues & Discriminatory Provisions

- **14-Days ON/OFF Rotational Duty:** Under the new policy, an officer who works beyond the standard 14-days continuous duty rotation is granted compensatory off equal to the number of extra days worked.

Contd....2

A staff-level employee working on the 14-days ON/OFF duty pattern is effectively denied any compensatory off or overtime pay when a National Holiday falls within their on-duty period. **The guidelines clearly state that no Compensatory Off or Overtime shall be granted for that day.**

This policy has led to widespread resentment among employees, who believe their fundamental right to holiday pay is being ignored.

- **Round the Clock Shift Duties (24×7 Operations):**

The policy's provisions for continuous shift workers (e.g. 24x7 rotating shifts such as "2 Morning/2 Evening/2 Night/2 Off" cycles) performed beyond the scheduled roster, **officers are allowed to take a compensatory off** (since they normally are not eligible for OT pay). **Staff employees are entitled to overtime wages for extra shifts** or can **avail a compensatory off** under the new rules. Moreover, if a staff member's shift falls on a National or Festival Holiday, the policy again denies any compensatory off or Overtime for that day's work, effectively treating it as a normal day for staff.

- **General Shift & Field Staff (Weekly Off & Holidays):**

The **unfair treatment of field workers & general shift employees** under these new norms is particularly glaring. The policy explicitly **excludes certain categories from the compensatory off scheme**, stating that **"the scheme for compensatory off shall not apply to non-field personnel, field parties or executives on tour"**. This broad exclusion means that regular office staff ("Non-field") as well as on-site field teams are **barred from availing compensatory off** for extra work. For general shift employees (who usually work fixed daytime hours & have weekends off), the guidelines create a scenario where working on a scheduled rest day or weekend yields no immediate benefit. In fact, the policy absurdly stipulates that overtime for working on a weekly off/rest day will be **"admissible only if" the total number of working hours in that week exceed the limit prescribed by the applicable Act**. Practically, this implies that if management rearranges schedules to keep the week's total hours just at or below the legal threshold (e.g. 48 hours under the Factories Act), a staff member could be made to come in on their Sunday off **without any overtime pay or compensatory leave whatsoever**. The employee loses a day of rest with no compensation, which is grossly unfair.

Field workers in exploration, drilling, & production face similar denial of C-off/OT when they toil through holidays or beyond normal hours, unless an arbitrary overtime threshold is crossed. Such provisions not only undermine staff morale but also appear to be a calculated attempt by ONGC's management to **evade paying overtime or granting leave** by exploiting technicalities, disproportionately affecting the lowest rungs of the workforce.

Concerns under Labour Laws & Regulations

We condemn that the above policy guidelines are not only unethical but may also **violate the spirit, if not the letter, of Indian labour laws** designed to protect workers' rights. The **Factories Act, 1948** stipulates clear limits on working hours & mandates extra wages for overtime work in factories specifically, **any work beyond 9 hours a day or 48 hours a week must be paid at twice the ordinary rate**. This Act also guarantees a weekly day of rest (one day off in every seven-day period) & requires that if workers are made to work on a rest day, they be given a substitute day off or overtime pay in lieu. The **Mines Act, 1952** contains similar provisions, with **Section 33 ensuring overtime wages for work beyond the prescribed hours** in mines & oilfields. Furthermore, the **Shops & Commercial Establishments Acts** of various states, which cover commercial & office establishments also lay down maximum working hours, mandatory weekly offs, & overtime payment requirements for all employees (including those in managerial or supervisory roles).

The ONGC policy in question appears to **circumvent these legal safeguards**. By only granting overtime or comp-off when absolute hour limits are exceeded, the policy ignores the fact that **forcing an employee to work on a scheduled off-day or holiday inherently warrants compensation**, regardless of whether weekly totals cross 48 hours. Denying any form of relief for work on National Holidays or Sundays, as the policy does for staff, runs counter to the established norms under labour statutes (e.g. **Section 52 & 59 of the Factories Act**) which ensure weekly holidays & overtime pay for extra work. While the policy document asserts that overtime allowance is payable to unionized category employees as per law, in practice its detailed guidelines nullify overtime entitlement in many cases by predefining those situations as "not admissible" for staff. This is an affront to the **principle of equity and fair labour practice**. It effectively creates a class of workers who are expected to put in extra hours with neither extra pay nor time off, which could be construed as an **unfair labour practice** and a violation of their right to just and humane conditions of work (**Article 42 of the Constitution of India**).

Prayer for Intervention and Relief

In light of the foregoing issues, we humbly **request the Government's intervention** under the relevant provisions of law to remedy this situation. Specifically, we seek the following relief:

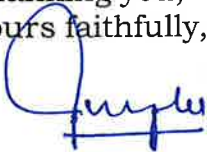
- 1. Thorough Review of ONGC's Policy:** We urge the Ministry of Labour & Employment to conduct a **comprehensive review** of ONGC's new Compensatory Off and Overtime policy (Office Order 13/2025) in context of the **Factories Act, 1948, Mines Act, 1952**, and the applicable **State Shops and Establishments Acts**, among other labour laws. The review should ascertain whether the policy's provisions comply with the minimum statutory requirements for overtime pay, weekly off and holiday work and identify clauses that violate or undermine workers' rights under these laws.
- 2. Directive to Rectify Discriminatory Provisions:** We request that the appropriate authority **issue directions to ONGC's management to immediately rectify or withdraw the discriminatory guidelines** in the said policy. ONGC should be instructed to ensure **uniform and fair compensatory off and overtime rules for all categories of employees**.

In practice, this means staff-level employees working in "**Offshore**" or in "**Round the Clock Shift duty**" must receive due compensatory off or overtime payment for extra days worked (such as when working beyond their scheduled duty cycle, on National holidays or other closed holidays) just as any worker in India is entitled to any provision that currently denies staff a benefit that is given to others (or that they are entitled to under law) should be removed or amended.

- 3. Ensuring Compliance and Fair Compensation:** We also seek your kind offices to **monitor and ensure that ONGC abides by all labour law provisions** going forward. The company should be reminded that **overtime must be compensated at double rates as per Section 59 of the Factories Act** and corresponding provisions in the Mines Act, and that **no employee can be deprived of a weekly holiday or National holiday without adequate compensation or a substituted rest day**. We pray that the labour authorities issue necessary **compliance instructions** so that ONGC institutes fair practices – for example, granting a compensatory off for staff who work on a holiday or rest day (in addition to overtime wages where applicable), and treating all employees with parity in matters of overtime and compensatory off. This will not only ensure legal compliance but also foster industrial harmony by addressing the just grievances of the staff.

We trust your authority will give this complaint its due consideration. **The staff employees of ONGC feel aggrieved and demoralized** by the current policy, and an early positive action in this matter would go a long way in upholding their faith in the nation's labour justice system. We remain available for any further information or clarification that may be required, and we urge you to kindly treat this representation as a matter of priority to prevent further injustice to the workers concerned.

Thanking you,
Yours faithfully,



(Pradeep Mayekar)
General Secretary

Copy to:

1. The Secretary (L&E), Ministry of Labour & Employment, Government of India,
Shram Shakti Bhawan, Rafi Marg, New Delhi-110001.
2. Chairman & CEO , ONGC, PDD Urja Bhavan, "5", Nelson Mandela Marg, Vasant Kunj,
New Delhi-110 001.
3. Director (HR) , ONGC, PDD Urja Bhavan, "5", Nelson Mandela Marg, Vasant Kunj,
New Delhi-110 001.
4. Chief Labour Commissioner (C), Ministry of Labour & Employment, Govt. of India,
Shram Shakti Bhawan, Rafi Marg, New Delhi-110 001
5. Dy. Chief Labour Commissioner (C), Ministry of Labour & Employment,
Govt. of India, Shram Raksha Bhawan,
Shiv Shrushti Road, Sion, Mumbai-400 022.
6. Shri. Anil Desai, MP (Loksabha), Shivsena (UBT) Leader, Secretary
President - Sthaniya Lokadhikar Samitee Mahasangh.
President - ONGC (WOU) Karmachari Sanghatana.



No. DDN/CORP-ER/ESTT-POLICY/2025/CoffOT/2600682

Dated: 07.08.2025

OFFICE ORDER (13/2025)

Subject: Regulating Compensatory off and Overtime

MCoD in its 663rd meeting held on 16th July 2025 at New Delhi accorded approval for Compensatory off and Overtime guidelines as follows:

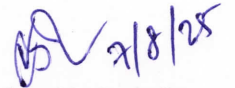
- a) Compensatory Off (C-off) and Overtime (OT) for various duty patterns shall be regulated as follows:

DUTY PATTERN/ TYPE	WORKING BEYOND SCHEDULED DUTY PERIOD		NATIONAL HOLIDAY		CLOSED HOLIDAY other than NH	
	OFFICERS	STAFF	OFFICERS	STAFF	OFFICERS	STAFF
14 DAYS ON/OFF DUTY PATTERN	C-off equal to the number of days deployed on duty beyond 14 days, after completion of scheduled duties.	<ul style="list-style-type: none">Entitled to Overtime allowance if they work beyond 12 hours during ON duty for putting extra hours of work beyond scheduled duty hoursC-off equal to the number of days deployed on	<p>1. If NH falls on day of duty, no C-off would be admissible.</p> <p>2. If NH falls on off duty period, no C-off would be admissible.</p>	<p>1. If NH falls on day of duty, neither C-off nor OT is admissible.</p> <p>2. If NH falls on off duty period, no C-off would be admissible.</p>	<p>1. If CH/RH falls on day of duty, no C-off would be admissible.</p> <p>2. If CH/RH falls on off duty period, no C-off would be admissible.</p>	<p>1. If CH/RH falls on day of duty, neither C-off nor OT is admissible</p> <p>2. If CH/RH falls on off duty period, no C-off would be admissible.</p>

DUTY PATTERN/ TYPE	WORKING BEYOND SCHEDULED DUTY PERIOD		NATIONAL HOLIDAY		CLOSED HOLIDAY other than NH	
	OFFICERS	STAFF	OFFICERS	STAFF	OFFICERS	STAFF
		duty beyond 14 days, after completion of scheduled duties. They can claim OT in lieu of C-off.				
ROUND THE CLOCK SHIFT DUTY PATTERN (2M/2E/2N /2 DAYS OFF)	Perform extra shift duty either in continuation of scheduled shift or on a rest day, one compensatory off shall be granted	Perform work either in continuation of scheduled shift or on a rest day, Overtime will be admissible. Employee may, at his option, be entitled to avail C-off in lieu of OT if the employee performs extra shift duty either in continuation of scheduled shift or on a rest day.	1. If NH falls on day of duty, no C-off or out of pocket would be admissible. 2. If NH falls on off duty period, no C-off would be admissible.	1. If NH falls on day of duty, neither C-off nor OT is admissible. 2. If NH falls on off duty period, no C-off would be admissible.	1. If CH/RH falls on day of duty, no C-off or out of pocket would be admissible. 2. If CH/RH falls on off duty period, no C-off would be admissible.	1. If CH/RH falls on day of duty, neither C-off nor OT is admissible. 2. If CH/RH falls on off duty period, no C-off would be admissible.
2 DAYS ON/OFF SHIFT DUTY	For working on 3 rd or 4 th day in	For working beyond 2 days- OT	1. If NH falls on day of duty, no C-off	1. If NH falls on day of duty, neither	1. If CH/RH falls on day of duty, no	1. If CH/RH falls on day of duty, no

DUTY PATTERN/ TYPE	WORKING BEYOND SCHEDULED DUTY PERIOD		NATIONAL HOLIDAY		CLOSED HOLIDAY other than NH	
	OFFICERS	STAFF	OFFICERS	STAFF	OFFICERS	STAFF
PATTERN	continuation of 2 day shift, C-off would be admissible for the day of retention.	would be admissible. Employee may, at his option, be entitled to avail C-off in lieu of OT.	or out of pocket would be admissible. 2. If NH falls on off duty period, no C-off would be admissible.	C-off nor OT is admissible. 2. If NH falls on off duty period, no OT or C-off would be admissible.	C-off or out of pocket would be admissible. 2. If CH/RH falls on off duty, no C-off would be admissible.	C-off or OT would be admissible. 2. If CH/RH falls on off duty, no C-off would be admissible.
GENERAL SHIFT (when deployed in field at various stages of exploration, drilling and production)	For working on weekly off/rest day, no C-off is admissible. Employee can claim Out of Pocket as per the scheme	For working on weekly off/rest day, the employee is entitled to avail C-off. Overtime for working on weekly off/rest day shall be admissible only if the total number of working hours in the week exceed the limit as mentioned in the applicable Act.	If NH falls on weekly off day, no C-off would be admissible	If NH falls on weekly off day, no C-off would be admissible	If CH/RH falls on weekly off day, no C-off would be admissible	If CH/RH falls on weekly off day, no C-off would be admissible

- b) The eligible employees will be allowed to avail the compensatory off with the prior approval of the controlling officer within the month in which the C-off is earned or within next two months immediately following that month subject to earning / accumulation of maximum four compensatory offs in one calendar month.
- c) The compensatory off can be prefixed or suffixed with earned leave (EL), half pay leave (HPL) or casual leave (CL) and restricted holidays (RH- only for General shift) with prior permission of the controlling officer.
- d) The scheme for compensatory off shall not apply to non-field personnel, field parties or executives on tour.
- e) Overtime allowance is payable to all the employees of unionized category as compensation, wherever applicable, for putting in extra hours of work, beyond normal duty hours.
- f) Employees covered by the Mines Act, 1952 shall be paid Overtime as per the Mines Act and rules made thereunder.
- g) Employees covered by the Factories Act, 1948 shall be paid Overtime as per the Factories Act and rules made thereunder.
- h) Employees covered by the Shops and Commercial Establishment Act of the respective State Governments shall be paid Overtime as per the Shops and Commercial Establishment Act and rules of the State Govts.
- i) These instructions shall be effective from the date of issue of office order.
- j) Other terms and conditions shall remain unchanged.



(Vaskar Kr. Barai)
Chief General Manager (HR)

Distribution: Through ONGC Reports

(Not to be circulated through individual social media platforms/accounts)