

NCL Alltek & Seccolor Ltd Anti-Sexual Harassment Policy

I) POLICY

NCL Alltek & Seccolor Ltd., having its registered and admin office at Ganga Enclave Plot No 1,3rd floor Petbasheerabad, Kompally Road, Hyderabad-500067. The Company believes that all employees of the Company have the right to be treated with dignity. The Company believes that Sexual Harassment in any form at workplace is a grave offence. The Company takes on itself the responsibility to identify and prevent Sexual Harassment and to develop a culture of “zero tolerance” for any form of Sexual Harassment at the Workplace. The Company will respond promptly to reports of Sexual Harassment and will take prompt and appropriate steps to take cognizance of acts/behavior that violates this Policy and if necessary, facilitate legal action.

2. LEGISLATIVE BACKGROUND AND REQUIREMENT

- The Government of India has notified the Sexual Harassment of Women at the Workplace (Prevention, Prohibition Redressal) Act, 2013 (“Act”) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“Rules”). Both the Act and the Rules have come into force with effect from December 9, 2013. The Act and the Rules were both drawn up and passed in furtherance to the guidelines as laid down by the Supreme Court of India in the matter of Vishaka v. State of Rajasthan, to ensure that women, in particular, are protected against Sexual Harassment at all work places, be it in public or private, and to create work environments that recognizes right to gender equality, life and liberty and equality in working conditions everywhere.
- This Anti-Sexual Harassment Policy gives effect to the legal provisions contained in the Act and the Rules relating to protection against Sexual Harassment at Workplace and for establishing the necessary mechanisms for redressal of complaints of Sexual Harassment and for matters connected therewith or incidental thereto.
- In order to comply with the provisions of the Act, every organization has to formulate and implement an Anti- Sexual Harassment Policy (“Policy”).
- This Policy is meant to educate the Employees about what act/conduct constitutes Sexual Harassment and has been formulated to prohibit, prevent or deter the commission of acts of Sexual Harassment at workplace, and in the event of such an occurrence, to enable a fair mechanism for dealing with such conduct.

II) SCOPE AND EFFECTIVE DATE

- ❖ This Policy is a policy for the protection of women Employees.
- ❖ This Policy extends to all Employees of the Company whether permanent, temporary, on training and on contract and is deemed to be incorporated in the service conditions of all Employees.
- ❖ It also extends to outsiders who come in contact of the Employees of the Company and who allege that they have been sexually harassed by the said Employee.
- ❖ The Company will also not tolerate Sexual Harassment of the Employees of the Company, if engaged in by clients or any other business associates.

- ❖ This Policy shall extend to:
 - a. All Company-related activities performed at any other site away from the Company's premises;
 - b. All Employees at (whether in the office premises or outside while on assignment) Company's office.
 - c. Incidents of Sexual Harassment reported by Company's Employee as a result of an act by a third party or outsider while on official duty.
 - d. The Company will take all necessary and reasonable steps to assist the affected person in terms of support and remedial/preventive action.
 - e. This Policy shall come into effect immediately upon its approval by the Board of Directors of the Company.

III) DEFINITIONS

Sexual Harassment

includes any unwelcome acts or behavior (whether directly by implication) such as Physical contact and advances; or demand or request for sexual favors; Making sexually colored remarks; Showing pornography; or Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Additionally, any of the following, in relation to or connected with the above, will constitute

- i. Implied or explicit promise of preferential treatment in her employment ; or
- ii. Implied or explicit threat of detrimental treatment in her employment; or
- iii. Implied or explicit threat about her present or future employment status; or
- iv. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- v. Humiliating treatment likely to affect her health or safety.

Employee

For the purpose of this Policy, means and includes any person hired by the Company. whether as a consultant or as an employee on the rolls of the Company who is employed for any work on regular, temporary, ad-hoc or daily wage basis, directly or through an agent, including a contractor, with or, without the knowledge of the Company's management, whether for remuneration or not, or working on voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker,, trainee, apprentice, article clerk or called by any other such name.

Workplace

- i. The Company's Registered offices situated at Ganga Enclave Plot No: 1,3rd floor Petbasheerabad, Kompally road, Hyderabad-500067
- ii. All the Manufacturing Units, Regional Offices PAN India
- iii. Any place visited by an Employee of the Company, arising out of or during the course of discharging the Company's work

Aggrieved Woman/Victim

With respect to the Act in relation to the workplace is a person of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.

Respondent

Means the person who is alleged or reported to have committed an act of Sexual Harassment and against whom the Aggrieved Woman/ Complainant has made a Complaint under this Policy in terms of Section 9 of the Act.

Complaint

Means information, either oral or written, made by the Aggrieved Woman/ Complainant. However, complaint made orally must be reduced in writing with the assistance of the Internal Complaints Committee members.

IV) INTERNAL COMPLAINTS COMMITTEE

An Internal Complaints Committee ("ICC") must be constituted, in accordance with the provision of Section 4 of the Act to redress complaints of Sexual Harassment.

An ICC shall consist of:-

- a. A presiding officer who shall be a woman employed at senior level;
- b. Not less than two Members from amongst the Employees preferably committed to the cause of women;
- c. One Member from an NGO or association committed to the cause of women or person familiar with the issues relating to the Sexual Harassment.
- d. At least one half of the total Members nominated shall be women. The Presiding Officer and Members shall hold office for a period not more than 3 years.
- e. An order constituting the ICC shall be passed and shall be displayed at any conspicuous place of the Company.

V) REDRESSAL PROCESS

1. Complaint -

a. Any Woman Employee who feels that she is being sexually harassed, directly or indirectly, may submit a Complaint of the alleged incident to any member of the ICC in writing with her signature within three (3) months of occurrence of incident, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The ICC may, after recording its reasons in writing, extend the time limit if it is satisfied with the circumstances that led to preventing the Complainant from making the Complaint within three (3) months;

- b.** A Complaint may also be made by a legal heir or any of the persons specified under Sub-section (2) of Section 9 of the Act read with Rule 6 of the Rules, where the Complainant is unable to do so, on account of any kind of incapacity;
- c.** The Internal Complaints Committee shall maintain a register to record the Complaint received by it and keep the contents confidential, except to use the same for inquiry;
- d.** The Complainant must file six copies of the Complaint along with supporting documents and names and addresses of witnesses;
- e.** The ICC shall forward one copy of the Complaint to the Respondent within seven (7) working days of receipt of complaint;
- f.** The Respondent must file his response to the Complaint along with supporting documents and names and addresses of witnesses, within ten (10) days of receiving the Complaint copy from the ICC. A copy of the said response shall be provided to the Complainant forthwith.

2. Settlement through Conciliation-

- a.** At the request of the Complainant the ICC, shall, prior to initiating an inquiry, take steps to settle the matter between the Complainant and the Respondent through conciliation. The ICC shall record the terms of any such settlement reached between the Complainant and the Respondent, and forward the same to the management/employer to take action as recommended;
- b.** If the Respondent fails to comply with the terms and conditions of the Settlement, the Complainant may inform the ICC of the same for further action, as provided under the Act.

3. Inquiry and Action-

- a.** The ICC will make an inquiry into the Complaint in accordance with the principles of natural justice;
- b.** During the pendency of an inquiry, the ICC shall, on the request made by the Complainant, grant interim relief in accordance with the provision of Section 12 of the Act;
- c.** The ICC may terminate the inquiry proceedings or decide ex-parte on the Complaint, if the Complainant or the Respondent does not, without sufficient cause, present himself/herself for three consecutive hearings convened by the ICC;
- d.** The quorum for convening a meeting of the ICC for the purpose of an inquiry shall be three (3) members of the ICC, including the presiding officer;
- e.** The ICC shall complete the inquiry within a period of ninety (90) days and communicate its findings and its recommendations for action to the Company's management in a report, within ten (10) days of completing the inquiry;
- f.** A copy of the report shall also be made available to the Complainant and the Respondent;

- g. In the event, the Complaint does not fall under the purview of Sexual Harassment or the allegations are not established, the ICC shall recommend to the Company that no action is required to be taken and close the enquiry by recording reasons in writing;
- h. None of the parties can be represented by a lawyer during the proceedings;
- i. The ICC shall be governed by the “Act” and the “Rules”.
- j. ICC shall take action in accordance with the provision of Section 14 of the Act against a Complainant for knowingly or recklessly bringing a false Complaint of Sexual Harassment and false evidence;
- k. If on an inquiry, the Complaint is found to be false or malicious, or that a witness has given misleading evidence, the Complainant or the witness, as the case may be, shall be liable for appropriate disciplinary action by the ICC. Such malicious intent must be established after an inquiry;
- l. A mere inability or insufficiency to substantiate a Complaint shall not be considered as grounds for taking action.

VI) ANNUAL REPORT

The ICC shall submit a report periodically to Board and in Annual Report of the company the details of number of cases received, disposed and pending for more than ninety (90) days, and nature of action taken by the ICC/ Company.

VII) REVISION AND TERM OF THE CODE AND ANTI-HARASSMENT POLICY

This Anti-Harassment Policy shall be reviewed preferably once in three years, or as and when there are any amendments to the Act or Rules, whichever is earlier.

VIII) CONTACT DETAILS OF KEY PERSONS

Names of the members of the ICC, along with their contact details are provided in the order constituting the ICC. The Company will periodically update the list of names and contact details of the members