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| Name of the Policy: Non-Discrimination and Equal Opportunity Policy | |  |
| Policy No: NECL/HR/GOR/ | No. of Pages: 03 | |
| Issue Date: | Rev Date: | |

1. Objective & Purpose: Navayuga Engineering Company Limited (hereinafter referred to as "NECL") is committed to promote equal opportunities in a workplace that is free of all forms of discrimination and harassment. The objective of this policy is to ensure that all employees or potential employees have equal opportunity based on relevant abilities and merit.

2. Definitions:

Discrimination includes:

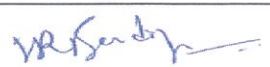
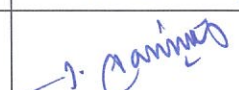
- Applying different conditions or standards of employment or work to individuals or employees,
- directly or indirectly disadvantaging certain individuals or employees,
- Refusing employment related opportunities without any reasonable cause or solely on the basis of gender, gender identity/expression, sexual orientation, age, place of birth, descent, ethnic or national origin, religion, community, caste, race, colour, physical appearance, marital status, disability etc.
- Denial of reasonable accommodation in working conditions and workplaces, and
- Unfair treatment in, or in relation to, employment.


Harassment: includes any kind of unwelcome act or behaviour in the workplace, direct or indirect, obvious or subtle, of a vexatious, disrespectful, offensive, intimidating, humiliating, demeaning, abusive, hostile, oppressive, or derogatory nature as well as micro aggressions and bullying by or towards any Employee. Such unwelcome behavior may be physical, verbal, or non-verbal.

3. Scope: The Policy is applicable to all employees, potential employees (Applicants) of NECL.

4. Policy Statement:

- NECL affirms to be an equal opportunity employer and recruit, hire, train, and promote at all levels, qualified applicants irrespective of religion, gender, color, sexual orientation, physical disability, and marital status. All other progressions during employment, such as compensation, benefits, rewards & recognition, training & development etc. will be administered disregarding above-mentioned Factors.
- NECL supports professional atmosphere that promotes dignity, respect, diversity, safety, and positive regard towards all in the workplace.
- Employees are encouraged to take positive action for promoting equal opportunity in NECL.
- NECL is committed to maintain a workplace that is free of any harassment & discrimination.
- Provide reasonable accommodation to persons with disabilities.
- Foster a safe, respectful, and inclusive workplace.
- Encourage gender balance and representation of under-represented groups.
- Maintain zero tolerance for discrimination or harassment.
- Encourage employees and other stakeholders to express their views & concerns, if any, in an open and transparent manner. Employee/stakeholder who believes that he/she has been discriminated is encouraged to report the concern to the Corporate HR Dept in writing/email hrhead@navayuga.com
- Appropriate/competent person(s) appointed for the purpose will inquire into any complaint of discrimination and/or harassment at the Workplace. NECL ensures that the inquiry will be conducted promptly, thoroughly, and objectively, in a just and fair manner. Privacy and confidentiality of the persons involved in the process will be maintained throughout.
- Any complaint received is resolved in 30 to 45 working days.
- Upon the conclusion of an inquiry, if the allegations against the perpetrator of Discrimination and/or Harassment at the Workplace is proven, appropriate action (including censure, suspension and/or termination) shall be initiated against the perpetrator as deemed fit.
- If the Inquiry arrives at a conclusion that the aggrieved individual falsely or maliciously accused the alleged perpetrator of discrimination and/or harassment at workplace, such a person shall be subject to appropriate disciplinary action as per internal misconduct rules/code of conduct of the Company.

| | Name | Designation | Signature |
|-------------|------------------|-------------|---|
| Prepared By | B Venkata Rajeev | VP-HR |  |
| Approved By | Gowrinath Atluri | CEO |  |

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5. Roles and Responsibilities

- Top Management – Champion equal opportunity principles & integrate them into company strategy.
- Human Resources – Implement, monitor, and train employees on this policy.
- Supervisors and Line Managers – Ensure equitable treatment and prevent bias.
- Employees – Demonstrate respect, inclusiveness and accountability.

6. Training and Communication: NECL will ensure that all its employees & other stakeholders are aware of the Policy. The Policy shall be easily available & accessible to all employees.

7. Retention of Documents/Annual Report: Annual report on complaints to be submitted to the management. Retention of documents for a period of 5 years.

8. Policy monitoring and review: The Policy shall be reviewed periodically at NECL and necessary modifications/improvements shall be incorporated to ensure the effectiveness of the Policy.

Annexure – Non Discrimination and Equal Opportunity Monitoring Record

Annexure A – Employee Acknowledgement Form

I hereby acknowledge that I have read and understood the Company's Non-Discrimination and Equal Opportunity Policy. I agree to comply with its principles and procedures at all times.

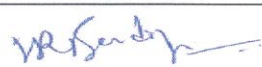
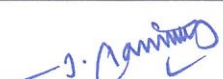
Employee Name: _____
 Employee ID: _____
 Department: _____
 Project & Location: _____
 Signature: _____ Date: _____

Annexure B – Complaint Form

Name of Complainant: _____
 Designation/Department: _____
 Project & Location: _____
 Nature of Complaint: _____
 Details of Incident (Date, Time, Location): _____
 Persons Involved: _____
 Preferred Mode of Resolution: _____
 Signature: _____ Date: _____

Annexure C – Investigation and Resolution Report

Complaint Reference No: _____
 Date of Complaint: _____
 Investigation Committee Members: _____
 Summary of Findings: _____
 Action Taken: _____
 Closure Date: _____
 Signature of HR Head: _____ Date: _____

| | Name | Designation | Signature |
|-------------|------------------|-------------|---|
| Prepared By | B Venkata Rajeev | VP-HR |  |
| Approved By | Gowrinath Atluri | CEO |  |