

Name of the Policy:

Prevention of Sexual Harassment against Women at Workplace

Policy No: NECL/HR/GOR/

No. of Pages:

Issue Date: 01.11.2024

Rev Date:



Objective:

The Company is committed to provide an environment that will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that women in the premises of the Company whether employees or not are not subjected to any form of harassment.

The Policy seeks to provide an avenue to women employees/other stake holders of the Company to report without fear any instance of Sexual harassment and redressal in the workplace.

Scope:

This policy applies to all women entering the premises of the Company, whether employees or not. However, the respondent has to be an employee of the Company. The Policy is deemed to be incorporated in the service condition of all employees and comes into effect immediately.

The policy is applicable to all employees of NECL and its subsidiary Companies.

Description:

I) Definition of Sexual Harassment:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical)
2. Demand or request for sexual favours
3. Any other type of sexually-oriented conduct
4. Verbal abuse or 'joking' that is sex-oriented
5. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.
6. Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body.
7. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
8. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes.
9. Giving gifts or leaving objects that are sexually suggestive.
10. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy.
11. Persistent watching, following, contacting of the woman employee.

II) Responsibilities Regarding Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

III) Complaint Mechanism:

To report an instance of Sexual Harassment, an appropriate complaint mechanism in the form of **"Internal Complaints Committee"** is created in the Company for time-bound redressal of the complaint made by an aggrieved woman, who need not be an employee of the Company.

	Name	Designation	Signature
Prepared by	B Venkata Rajeev	VP – HR	
Approved By	Gowrinath Atluri	CEO	

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Internal Complaints Committee:

The Internal Complaints Committee comprises of minimum of 4 members in following roles:

- Presiding Officer:** Shall be a woman employed at senior level at workplace amongst employees.
- Internal Member 1:** Anyone amongst the employees of the company preferably committed to the cause of women or who have experience or knowledge in Social work.
- Internal Member 2:** Anyone amongst the employees of the company preferably committed to the cause of women or who have experience or knowledge in Social work.
- External Member:** Anyone from the non-governmental organizations or associations committed to women welfare.

At least one half of the total members of ICC should be women.

The ICC Responsibilities:

- ✓ Investigating every formal written complaint of sexual harassment;
- ✓ Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- ✓ Discouraging and preventing employment-related sexual harassment.

a) Procedure for Resolution, Settlement or prosecution of Acts of Sexual Harassment:

The Company is committed to providing a supportive environment in which to resolve concerns of sexual harassment as under:

b) Informal Resolution Options:

- When an incident of sexual harassment occurs, the aggrieved woman can communicate her disapproval and objections immediately to the harasser and alert harasser to behave decently.
- If the harassment does not stop or if the aggrieved woman is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Internal Complaints Committee for redressal of her grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

c) Complaints:

- Any aggrieved woman with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the aggrieved woman can send complaint through an email. The complainant is required to disclose her name, department, division and location she is working in and such other details to enable the Committee to contact her and take the matter forward.
- The Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 15 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, the Committee will record this finding with reasons and communicate the same to the complainant.
- If the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, it will proceed to investigate the allegation.

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4. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director of the Company as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint.
6. Corrective action may include any of the following:
 - a. Formal apology
 - b. Counselling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - e. Suspension or termination of services of the employee found guilty of the offence
7. The Managing Director/Management shall act upon the recommendations within Thirty [30] days and confirms to the committee.
8. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

IV) Confidentiality:

The Company understands that it is difficult for an aggrieved person to come forward with a complaint of sexual harassment and recognizes the individual's interest in keeping the matter confidential.

To protect the interests of the complainant, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

V) Access to Reports and Documents:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

VI) Protection to Complainant / Aggrieved Person:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subjected to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that complainant or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

VII) Reports:

The Internal Complaints Committee will send reports to Company Secretary of NECL and its group Companies giving an update on the Complaints and its status, if any, on Quarterly basis and the statutory annual POSH returns submitted to the Women and Child Development wing.

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