

POLICY FOR PROTECTION OF WOMEN'S RIGHTS AT WORK PLACE

NAGPUR SEONI EXPRESS WAY LIMITED

A. Introduction

Nagpur- Seoni Express Way Limited (the "Company") believes that every woman Employee is entitled to work in an environment that is free from any conduct which can be considered as sexual harassment. Sexual Harassment infringes the fundamental right of a woman under Article 14 and 15 of the Constitution of India and her right to life and live life with dignity under Article 21 of the Constitution of India, which includes the right to a safe environment, free from sexual harassment.

The right to protection from sexual harassment and the right to work with dignity are recognized as universal human rights by International Conventions such as Convention on the Elimination of all Forms of Discrimination against women, which has been ratified by Government of India. Consequentially, the Supreme Court of India has laid down the fundamental guidelines to address the issue of sexual harassment until a suitable legislation is enacted by Government of India.

This policy is amended by the Board of Directors of the Company at its meeting held on December 23, 2020 and shall be effective from the December 23, 2020.

B. Objective

The Objectives of the Policy are threefold:

- To define sexual harassment;
- To lay down the guidelines for reporting acts of sexual harassment at workplace; and
- To provide the procedure for the resolution and redressal of complaints of sexual harassment.

C. Applicability

This Policy is based on the laws of India and therefore the Policy is applicable to all Employees of NSEWL located in India, irrespective of their level, rank or designation, across all departments, functions and operations.

Where sexual harassment occurs as a result of an act or omission by any Third Party, the Company will take all steps that are necessary and reasonable, to assist the affected person/victim.

D. Definitions

1. **"Company"** means Nagpur- Seoni Express Way Limited, having its Registered Office at "Sadbhav House" opp. Law Garden Police Chowki, Ellisbridge Ahmedabad -380006 India which expression shall also include its subsidiaries, and associate companies.

2. **“Complaint”** means any complaint (written or oral form) made by a female employee against any other employee within the company or any Third Party having business dealings with the Company.
3. **“Employees”** mean employees of the Company and employees of its holding, subsidiaries, and associate Companies. Employees would include a person employed at the Company for any work on regular, temporary, ad hoc or daily wage basis, either directly or by or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a domestic worker, a co-worker, a contract worker, probationer, trainee, apprentice or by any other name called.

Explanation: The aforesaid definition of **‘Employee’** shall be used only for the purposes of the Policy and cannot be used to claim rights of an employee conferred by any law for the time being in force.

4. **“Policy”** means the “Policy for Protection of Women’s Rights at the Workplace” of the Company.
5. **“Sexual Harassment”** means and includes such unwelcome sexually determined behaviour as physical contacts and advances, sexually coloured remarks, showing pornography, a demand of request for sexual favours or any other unwelcome conduct of sexual nature whether verbal, textual, physical, graphic or electronic or by any other actions, which may include, but is not limited to –
 - Implied or overt promise of preferential treatment in employment; or
 - Implied or overt threat of detrimental treatment in employment; or
 - Implied or overt threat about present or future employment status; or
 - Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or
 - Humiliating conduct constituting health and safety problems.
6. **“Third Party”** means and includes any person not on the rolls of Company but who, in the course of work-related activities, interacts with the Employees; such as customers, vendors, suppliers of Company.

E. Internal Complaints Committee

Internal Complaints Committee (ICC) means a Committee constituted by the Company for redressal of complaints of Sexual Harassment in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

F. Composition of Committee

As per requirement of law, the ICC should comprise of :

- Presiding Officer: A woman employed at a senior level in the organization or workplace.

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.

- At least 2 members from amongst employees, committed to the cause of women and or who have had experience in social work or have legal knowledge;
- One external member from amongst Non-Governmental Organizations or associations committed to cause of woman or a person familiar with the issues relating to sexual harassment.
- At least one half of the total members shall be women.

The ICC shall be constituted by the Board of Directors of the Company and shall be reconstituted, as and when required.

G. Procedure

Woman employee makes complaint within 3 months from the date of incident / last incident either verbally or as per Annexure 1: Template for Reporting Sexual Harassment instance to any members of the ICC as applicable.

Keeping in mind the criticality of the responsibility that has been bestowed upon the ICC, it is necessary for them to operate within realistic and reasonable time frames for resolution of Complaints, depending upon the magnitude of seriousness. In any case, the ICC should initiate action expeditiously on Complaints received. Recommendations for resolution should also be made as early as possible preferably within 2 weeks on receipt of Complaint.

However, where the investigation process is time consuming, the complaint should be acted on in an appropriate time frame.

ICC should facilitate redressal of the Complaint in consultation with the concerned Business Head/s.

In any case, the findings and details of all Complaints should be forwarded to the Chief Executive Officer of LTIDPL IndvIT Services Limited (Investment Manager to IndInfravit Trust, the Holding Entity).

The redressal procedure shall be as provided in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

H. Meetings of the Committee

In case of any complaint is received, ICC shall meet accordingly for early redressal.

I. Duty of the Committee

- Inform complainant of her right to make a complaint to the Police, if she so desires;
- Study and investigate the complaint in accordance with the principles of natural justice;
- Facilitate the redressal of the complaint and initiate appropriate action in accordance with the standing orders / applicable regulations in consultation with Business Head;
- In the event the Committee discovers after the findings that the complaint is frivolous in nature then such complaint may be dismissed. The Committee, if it finds the complaint to be maliciously motivated, should recommend appropriate disciplinary action against the complainant.

J. Documentation

1. The minutes of the Meetings of the ICC shall be communicated via email to all present at the meeting including the members, complainant, etc;
2. The compilation of the minutes of the Meetings and detailed report of findings, recommendation and action taken pertaining to Complaint registered with the ICC shall be communicated to the Chief Executive Officer of LTIDPL IndvIT Services Limited (Investment Manager to IndInfravit Trust, the Holding entity).
3. Such records and Minutes of the Meeting of the Committees shall be maintained in the office of the Chairperson of each of the ICC and should be retrievable as and when required.

K. Confidentiality

The Minutes of the Meeting of the ICC, the findings, recommendations, decisions of the ICC and any document or any verbal communication shall be kept strictly confidential and the members shall not divulge the details to any other Employee within the Company or to any person outside the Company. Also, to other Employees involved in such discussions, the members should emphasize the necessity for confidentiality and the consequences of possible disciplinary action in case of transgression.

L. Dissemination of this Policy

1. This Policy is issued by the management of Company;
2. This Policy may be reviewed on a yearly basis for any changes or modifications;
3. This Policy is to be shared with Employees at the time of induction and appropriate forums.
4. Ensure that the Third Parties are made aware of this Policy.

Annexure 1: Template for Reporting Sexual Harassment

To:

The Internal Complaints Committee
Nagpur Seoni Express Way Limited

Please provide the details of the person/s involved in this sexual harassment case:

Name:

Designation:

Location, SBU and relationship with you (eg. supervisor, colleague, etc)

Critical Incidents and Factual Data:

a. Please describe the incident/s

b. List supporting information/ data that the Committee can seek from you while investigating. eg. exact date/s, place/s of the incident/s, witnesses, if any, text messages, emails, etc.

Date:

Name & Location of the Complainant _____

PS No. of the Complainant _____

Contact Information: _____