

05.11.2022

ANTI SEXUAL HARRASMENT POLICY (POSH)

The company believes that all employees of the Company have the right to be treated with dignity. The Company is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. 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. It 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.

- This Policy is Gender Neutral, however encompassing the provisions of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition Redressal) Act, 2013 (Act), in letter and spirit and applying it to both genders. Hence the word "women/woman", wherever mentioned in this policy would imply and include "man/men/male", as applicable and appropriate.
- 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.
- The Company will take all necessary and reasonable steps to assist the affected person in terms of support and remedial/preventive action. Any Woman/men Employee who feels that he/she is/are being sexually harassed, directly or indirectly may submit complaint in writing of the alleged incident to any of the members of ICC in writing with his/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 Compliant should be filed in six copies along with supporting documents and names and addresses of witnesses if any, 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.
- The ICC upon receipt of the written Compliant will make an inquiry into the Complaint in accordance with the principles of natural justice and all procedures shall be governed by the "Act" and the "Rules" of Sexual Harassment of Women at the Workplace (Prevention, Prohibition Redressal) Act, 2013.
- 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.

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.

1. Mrs. Pooja Kalidindi	-	Presiding Officer	-	9989931034
2. Mrs. Usha Rani Ch	-	Member	-	9704170251
3. Mrs. Divya Bharathi U	-	Member	-	7680901110
4. Mr. KBV Raghuram	-	Member	-	8317627555
5. Mr. Vijay V	-	Member	-	7702001131
6. Mrs. N.Seeta Lakshmi	-	External Member	-	9849169616

Email Id: icc@nclbuildtek.com

For detailed policy please refer to our website www.nclbuildtek.com

For NCL Buildtek Ltd.,



Authorized Signatory

