



National E-Governance Services Limited

Prevention of Sexual Harassment at Workplace Policy

Introduction

As an organization, NeSL is committed to ensuring that the work environment at all its locations is conducive to fair, safe and harmonious relations between employees. Discrimination and harassment of any type/form is strictly prohibited. We place high importance in creating a discrimination free workplace and any violation of any form is not tolerated as part of our employee practices.

We have also ensured that no employee is at disadvantage by the way of gender discrimination. This note therefore enunciates the Company's approach to the issue of sexual harassment and its policy for dealing with any incidence of the same.

Scope of this Policy

This policy applies to all individuals who are employed in a permanent or temporary capacity at any business location or deployed/visiting at customer site by the Company. This policy document will be made available to all locations associated with the Company with a clear objective to establish a similar approach in dealing with this issue.

Definition of Issue

A broad definition of sexual harassment consists of any physical or verbal behavior and any form of communication that has unnecessary, improper or unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances. It may consist of, but not be limited to, any of the following:

- Unwelcome sexual advances, requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature
- Transmitting any message, by mail, telephone, e-mail etc. which is obscene, lewd, suggestive or blatantly sexual in nature
- Any explicit or implicit communication wherein a sexual favor or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. thereby creating a hostile environment
- Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes
- Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings
- Any pervasive pattern of behavior which makes employees uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation
- Physical & sexual assault

As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

NESL POLICY ON SEXUAL HARASSMENT

The Company policy is to totally prohibit any form of sexual harassment in the way employees behave with each other. This would also include complaints relating to instances outside of the work place. This applies equally to all employees of NeSL. Any incident of sexual harassment will be taken

extremely serious and compliant of this nature will be immediately investigated and appropriate action will be taken against the offending employee/s. Such action will depend on the nature and seriousness of the offence and will include strict disciplinary action including and up to termination of services.

Complaints Handling Process

The company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

Process for dealing with incidents of sexual harassment

- Any employee who experiences sexual harassment can get in touch with any member of the Internal Complaints Committee (ICC) whose contact details are provided in this document for convenience and confidential access. Alternatively, the affected employee may approach any Location Senior Manager or HR team member and such person will inform a member of the ICC immediately.
- On receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter and ensure confidentiality of the legal proceedings. The complainant can choose to remain anonymous. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the effected employee. The employee/s, who has allegedly committed the offence, would be given all reasonable opportunities to be heard by the Committee. Principal of natural justice will be followed irrespective of gender bias.
- The result of this investigation will be formally recorded and communicated to the Management, NeSL, along with a recommendation from ICC for appropriate action.
- The Committee will normally complete this process within 30 days after receiving the complaint and make its formal recommendation within 10 days after completing the enquiry process, unless there are exceptional circumstances.
- In the case of a multi locational context, one of the committee members will travel to the location in question as is required to ascertain the facts based on which the committee would discuss and assess the complaint in question.
- Necessary action will then be initiated by management based on the recommendation of the investigating committee/ICC based on the circumstances and seriousness of the offence.
- Where the Company is legally advised that any such incident constitutes a criminal offence, the Company will inform the relevant authorities, provide full details and request appropriate action. If the aggrieved employee directly takes any action against the offending employee, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, suo moto, start the internal enquiry / investigation and recommend appropriate action.
- The Company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.
- In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the Company and appropriate action taken against such malicious complainant/s.
- If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the Location Senior Manager or SBU Head concerned with the relevant SBU or location.

The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee.

- SBU Heads and Location Senior Manager at all Company locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the Company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.
- We believe in **No Retaliation** against those employees who have raised concerns of this nature in **Good Faith** and the issues raised will be investigated with full conviction.

Internal Complaints Committee

The Company has established a Committee for Prevention Sexual Harassment consisting of 3 members. The names of the members of this Committee are given below.

Sl.No.	Name	Designation
1.	Dr. Nivedita Haran	Independent Director
2.	Shri. Diwakar Kannan	VP, Technology
3.	Ms. Shajitha Lobo	AVP, Business Development

Any petition regarding sexual harassment may be written to: poshc@nesl.co.in

Shri. S. Ramann, Managing Director & CEO, NeSL, will provide all necessary support to the work of this Committee

Adopted at the Board meeting held on 28th January, 2019