

POLICY ON PROHIBITION OF SEXUAL HARASSMENT

9.1 Scope

This Policy shall apply to all employees, contract labour in the utilization of the Company, apprentices, trainees, all officers and consultants of the Company.

Provided that nothing in this Policy shall apply to any action between any independent contractor and his employees or among such employees, or any action between contract labour of two independent contractors who are in the utilization of the Company as Contract Labour. All such cases will not come under the purview of this Policy.

9.2 Objective:

The Company firmly believes that every employee has a right to work in an environment free from harassment, intimidation or offensive behaviour and in which issues of harassment will be resolved without fear of reprisal. The Policy is designed to take effective measures to avoid and to eliminate and if necessary to impose punishment for any sexual harassment.

9.3 Policy

- Harassment in any form will not be permitted or tolerated or condoned by the Company whether it is based on a person's race, colour, ethnic or national origin, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability or other personal characteristics.
- The use of Company property including e-Mail, Bulletin Boards or documents as a vehicle for harassment is prohibited.

9.4 Definitions:

- a) "Board" means the Board of Directors of the Company.
- b) "Chairperson" means Chairperson of the Grievance Redressal Committee appointed under this Policy.
- c) "Company" means Nihar Info Global Limited.

- d) "Employee" shall mean and include all employees, Contract Labour in the utilisation of the Company, apprentices, trainees, all Officers and Consultants of the Company.
- e) "Grievance Redressal Committee" means Grievance Redressal Committee constituted under these Rules.
- f) "Policy" means this Policy i.e., the Policy of Nihar Info Global Limited for prohibiting for sexual harassment at work place.

9.5 Prohibition of Sexual Harassment

No employee shall engage in Sexual Harassment.

9.6 Meaning of Sexual HARASSMENT AND SEXUALLY Oriented Behavior

'Sexual Harassment', includes any unwelcome sexually determined behavior, direct or by implication, and includes physical contact and advances, a demand or request for sexual favors, sexually colored remarks, showing pornography, any other unwelcome physical, verbal or non verbal conduct of a sexual nature. Sexually Oriented behavior shall mean and include but not limited to the following:

- Material that is sexual in nature, sexiest, sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer or fax machine or on the Internet or any other public display system or public place in the work premises
- Verbal abuse or comments that put down people because of their sex
- Comments about people's (women/men) bodies
- Tales of sexual exploits
- Graphic descriptions of pornography
- Pressure for dates
- Sexually explicit gestures
- Unwelcome touching and hugging

- Sexist and insulting graffiti
- Sexist jokes and cartoons
- Obscene phone calls
- Displaying pornography in the workplace
- Insisting that workers wear revealing clothing
- Inappropriate gifts (for example, lingerie)
- Discussion of one's partner's sexual inadequacies
- Lewd and threatening letters
- "Accidentally" brushing sexual parts of the body
- Pressing or rubbing up against a victim
- Sexual sneak attacks (such as grabbing private parts on the run)
- Indecent exposure
- Subtle, overt or covert pressure for sexual favours
- Soliciting sexual services
- Demanding sexual services
- Sexual or physical contact, such as slapping, kissing or touching
- Intrusive questions about sexual activity
- Sexual assault
- Repeated sexual invitations when the person invited has refused/ignored similar invitations
- Coerced sexual intercourse (e.g., as a condition of employment or academic status)

“Sexual Harassment” should not be confused with simple friendly behaviour or with more intimate exchanges, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is neither solicited nor accepted by the recipient, it is unwelcome and / or imposed.

9.7 Rights and responsibilities of Employees

- (1) Every Employee shall be entitled to a work environment free from Sexual Harassment.
- (2) Every Employee shall be entitled to complain against Sexually Oriented Behaviour to which he/she was subjected to or which was targeted at him/her, to the Grievance Redressal Committee or to the Chairperson of the Committee or any other Member of the Grievance Redressal Committee established under these Rules, as the case may be.
- (3) Every Employee shall promptly report any incident of Sexual Harassment that comes to his/her knowledge, to the Grievance Redressal Committee or to the Chairperson of the Grievance Redressal Committee or to the Official designated by the Chairperson of the Grievance Redressal Committee as the case may be.

9.8 Constitution of the Grievance Redressal Committee

- The Chief Compliance Officer shall establish a Grievance Redressal Committee to deal with Sexual harassment. The Grievance Redressal Committee shall consist of three members.
- One Female member to act as Chairperson of the Grievance Redressal Committee. The other two members will be one male and other female member. The term of the office of Grievance Redressal Committee is for a period of two years and after the expiry of the said period the Company shall reconstitute the Grievance Redressal Committee.
- The Chief Compliance Officer may, if required, engage a person who is associated with or working with a Non-Governmental Organization or Institute that is engaged in the field of gender studies, equal opportunity, anti-gender discrimination, anti-sexual harassment movements, etc. or a practising professional like HR Consultant, Advocate, Doctor as the Chairperson of the Committee.
- The names of the persons who are on the Grievance Redressal Committee from time to time along with their contact telephone numbers and other details shall be displayed on the notice board of the company or on the Web Site as the case may be.

9.9 Powers and Duties of the Grievance Redressal Committee

- To ensure implementation of this policy.
- To ensure and supervise proper constitution and functioning of the Grievance Redressal Committee.
- To organise regular workshop and training programmes.
- To formulate programmes for the spread of awareness of the policy among the management.
- To bring out publication concerning Sexual harassment and also concerning implementation of this policy.

9.10 Grievance Procedure

- Any employee will have a right to lodge a complaint concerning sexual harassment against an employee or an outsider with the Grievance Redressal Committee.
- Such a complaint may be oral or in writing.
- If the Complaint is oral, the same shall be reduced in writing in detail by the Grievance Redressal Committee member to whom the complaint is made.
- The Complainant will be afforded full confidentiality at this stage.
- Immediately upon receipt of the Complaint, and within not more than 2 working days, the Member of the Grievance Redressal Committee to whom the Complaint is made shall communicate the same to the Chairperson of the Grievance Redressal Committee.
- Within a period of 5 working days from the date of such communication, the Chairperson shall convene a meeting of the Grievance Redressal Committee
- The Grievance Redressal Committee shall examine the complaint and shall undertake investigation of the complaint after giving opportunities to the complainant to present his case and the accused to give his version. The Grievance Redressal Committee may examine witnesses from both the sides and the other side will have opportunity of cross-examine the witnesses. Documents, if any, produced by the parties may be

taken on record. The Grievance Redressal Committee after completion of investigation may submit its report to the HRD for further necessary action in the matter.

9.11 Protection against Victimization

In the event complainant being an employee and the accused being his / her manager, during the pendency of investigation and even after such investigation if the manager is found to be guilty, the accused shall not act as Manager of the Complainant.

9.12 Consequence of Compliant Being Proved

In the event allegations made in the complaint are proved against the employee, it will be taken as proved misconduct and the competent authority may impose any of the punishment as envisaged in the policy on disciplinary process.

9.13 Obligations of the Management:

The Management of the Company shall provide all necessary assistance for the purpose of ensuring full effective and speedy implementation of this policy. Management shall be bound by the decision of the Grievance Redressal Committee constituted as above and shall implement such decisions in an expeditious manner.

9.14 Third Party Harassment

In case of third party Sexual Harassment, the Grievance Redressal Committee will actively assist and provide all its resources to the complainant in pursuing the complaint and ensure his/her safety at least in the company's premises.

9.15 Savings

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the accused under any other provision of civil or criminal law.

The provisions of this policy shall not restrict the power of company or complainant to proceed against the alleged offender for any other misconduct or to pursue the criminal or civil remedies.