

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES IN NESCO LIMITED

1. Introduction:

- 1.1 The NESCO LIMITED ('the Company' or NESCO), is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place if involving employees is a grave offence and is, therefore, punishable. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.
- 1.2 This policy extended to all employees of the Company and is deemed to be incorporate in the service conditions of all employees and comes into effect immediately.
- 1.3 "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

2. Definition of Sexual harassment:

- 2.1 Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- 2.2 Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- 2.3 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- 2.4 Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- 2.5 The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment, as defined in (2.1) above, may amount to sexual harassment:—
 - (i) Implied or explicit promise of preferential treatment at work; or
 - (ii) Implied or explicit threat of detrimental treatment at work; or
 - (iii) Implied or explicit threat about present or future employment status; or
 - (iv) Interference with work or creation of an intimidating or offensive work environment; or



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- (v) Humiliating treatment likely to affect health, safety or self-esteem.

3 Policy statement

- 3.1 All Nesco employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- 3.2 All Nesco employees will understand and appreciate the rights of the individual to be treated with dignity.
- 3.3 All Nesco employees are required to maintain a work environment, which is free from any kind of harassment.
- 3.4 Nesco employees will refrain from committing any acts of sexual harassment at work place.
- 3.5 Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- 3.6 Nesco employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

4 COMPLAINT REDRESSAL COMMITTEE

- 4.1 A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairperson and Members of the Committee are as follows:
 1. Mrs. Sudha S. Patel, Chairperson
 2. Mrs. Neeta D. Desai
 3. Ms. Vibhuti Vyas
- 4.2 A quorum of 2 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

5 REDRESSAL PROCESS

- 5.1 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- 5.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 5.3 The Committee will hold a meeting with the Complainant within 7 days of the receipt of the complaint, but no later than a week in any case.
- 5.4 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative



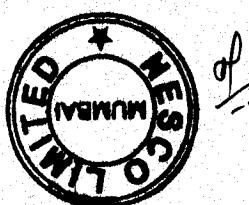
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material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

- 5.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 5.6 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- 5.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

6. ENQUIRY PROCESS

- 6.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 6.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she/he so desires within 7 days of receipt of the same.
- 6.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 6.4 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- 6.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he /she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- 6.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 6.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.



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- 6.8 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the VP-HR. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 6.9 The VP-HR will direct appropriate action in accordance with the recommendation proposed by the Committee.
- 6.10 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7. OTHER POINTS TO BE CONSIDERED

- 7.1 The Committee may recommend to the Head - HR action which may include transfer or any of the other appropriate disciplinary action.
- 7.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 7.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Nesco shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 7.4 The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Head - HR.
- 7.5 In case the Committee find the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

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For NESCO LIMITED

(Ashok R. Yadav)
Company Secretary and
Compliance Officer