

## CODE OF CONDUCT

<b>Policy No</b>	<b>Old No</b>	<b>Revised No</b>
	NEPL/HR/001-001	ECPL/EPM/001
<b>Version</b>	<b>Date of Release</b>	<b>Date of Applicability</b>
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### **Context**

Our Code of Conduct has been derived from our guiding principles. As a professionally run organization, we firmly believe in three interlinked fundamental principles, viz. good corporate governance, good corporate citizenship and exemplary personal conduct.

### **Philosophy**

It is our responsibility to ensure that the organization is managed in a manner that protects and furthers the interests of all concerned. It is also our belief that in order to serve the interests of our stakeholders in perpetuity, we must build Esme into an institution which is known for its dynamism and vitality.

### **Code of Conduct**

In the conduct of the Company's business, the practice of a professional relationship with each other is a prerequisite and embraces the following:

- 1. Dealing with People in the Organization:** In dealing with each other, we shall always demonstrate respect and integrity. Esme Consumer will focus on meritocracy and equity in all people processes.
- 2. Personal Conduct:** All of us shall conduct ourselves in an honest and ethical manner and act in the best interest of the Company at all times. We are committed to demonstrate exemplary personal conduct. The following are examples of conflicts of interest and should be avoided:
  - 2.1 Accepting loans, fees, special favours or services from suppliers, vendors, clients or others dealing with the company.
  - 2.2 Accepting a recreational or entertainment opportunity for a person or organization which does business with the company, whose value is such as to make it appear that the donor is attempting to influence the recipient
  - 2.3 Using company position for personal advantage (or that of a relative, friend or a colleague) for example requesting for employment opportunities, transfers etc.
  - 2.4 Working for competitors, suppliers or customers whether as a full time or part time employee as a consultant or otherwise.
  - 2.5 Appropriating, receiving, giving out or conspiring to appropriate, receive, and give out confidential information relating to the company, a guest, a supplier, or a competitor where the disclosure of such information is unauthorized.
  - 2.6 Deriving a personal benefit or a benefit to any of his or her relatives by making or influencing decisions relating to any transaction.

- 3. Protection of Confidential Information:** No employee shall disclose or use any confidential information gained in the course of employment/ association with the Company for personal gain or for the advantage of any other person. No information either formally or informally shall be provided to the press, other publicity media or any other external agency except within approved policies.
- 4. Esme maintains an open door for grievances and feedback:** We encourage employees to report any concerns and are responsive to employee feedback.
- 5. Relationships with Suppliers and Customers:** All employees shall ensure that in their dealings with suppliers and customers, the Company's interests are never compromised. Accepting gifts and presents of more than a nominal value, gratuity payments and other payments from suppliers or customers will be viewed as serious breach of discipline as this could lead to compromising the Company's interests.
- 6. Health and Safety:** We, as a company attach great importance to a healthy and safe work environment. We are committed to provide good physical working conditions and encourage high standards of hygiene and housekeeping. Particular attention is paid to training of employees to increase safety awareness and adoption of safe working methods, particularly designed to prevent serious or fatal accidents.
- 7. Company Facilities:** No employee shall misuse Company facilities. In the use of Company facilities, care shall be exercised to ensure that costs are reasonable and there is no wastage.
- 8. Leading by Example:** The organization's employees set the professional tone for the Company. Through both their words and their actions, the organization's leadership conveys what is acceptable and unacceptable behaviour. We, as employees must constantly reinforce through our actions and behaviour that our stated beliefs of responsible corporate citizenship are rooted in individual conviction and personal integrity.
- 9. Dual Employment:** During your employment with Esme Consumer, you are not authorised to accept or participate in any other assignment from any organization. If any employee is found to be involved in any sort of dual employment, it can be direct or indirect which may impact their efficiency at work, may lead to disciplinary action against him/her.
- 10. Conflict of Interest:** During the course of your employment with the company you will not engage yourself directly or indirectly in any professional or personal activity which might be considered prejudicial and detrimental to the lawful interest of the company i.e. its intellectual property rights, systems, processes, trade secrets, anything mentioned in its memorandum or articles of association or otherwise considered to be conflict of interest in this regard. You shall at all-times keep the company duly informed in writing and in the eventuality of failure in doing so the company shall be at liberty to proceed against such employee by initiating and prosecuting civil and criminal action as may be deemed fit and proper including seeking indemnity and damages.

- 11. Anti-Discrimination:** As a Company we believe in equal opportunity of work to all our employees and do not encourage any kind of discrimination. Hence at Esme Consumer, all employees shall strive to create a workplace that is free from discrimination in their employment practices against any potential or existing employees, and shall not discriminate on a person with respect to their Age, Colour, Social and Religious beliefs, educational or personal background, race, ethnicity or nationality, political opinion, physical features, gender identity and expression, Sexual orientation, medical records, etc.

Any instance of non-adherence to the Code of Conduct / any other observed unethical behaviour on the part of those covered under this Code should be brought to the attention of the immediate reporting authority and function HOD or Head of Human Resources.

Each employee should discuss with the HR Department any situation which is or may appear to be a conflict of interest. Violation of this policy may subject to disciplinary action as deemed advisable by the management.

#### **Business Ethics and Conduct**

The successful business operation and reputation of Esme is built upon the principles of fair dealing and ethical conduct of our employees. Our reputation of our integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of Esme is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees owe a duty to Esme, its customers, and shareholders to act in a way that will merit the continued trust and confidence of the public.

Esme will comply with all applicable laws and regulations and expects its directors, officers, and employees to conduct business in accordance with the letter, spirit and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor. Compliance with this policy of business ethics and conduct is the responsibility of every Esme employee.

Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

INTENDED FOR INTERNAL CIRCULATION ONLY

## WHISTLE BLOWER POLICY

<b>Policy No</b>	<b>Old No</b>	<b>Revised No</b>
		ECPL/EPM/002
<b>Version</b>	<b>Date of Release</b>	<b>Date of Applicability</b>
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### **Purpose**

The purpose of the Whistle Blower Policy is to allow employees to convey their concerns about unacceptable, improper or unethical practices being practiced in the organization to the Management and to prohibit superiors from taking any adverse personal action against such employees.

The Policy is intended to ensure that whenever any unacceptable, improper, or unethical practice is reported by an employee, the concerned employee is protected against any vindictive action and/or any discrimination for such reporting.

### **Scope**

This policy is applicable to all employees, third party vendors & contractual employees.

#### **1. Policy Details:**

Under this policy an Employees shall be protected from any adverse action for reporting any unacceptable, improper or unethical practice, fraud, or violation of any law or regulation so long as the employee:

- Reports in good faith, his/her belief that there is misuse of company's funds/assets.
- Reports in good faith, criminal offences (corporate fraud, corruption, bribery or theft), which has been or is likely to be committed.
- Reports in good faith, the violation or suspected violation of any law, rule or regulations applicable to the Company.
- Participates in or gives information in an investigation, hearing, court proceeding, legislative or other inquiry, or administrative review
- Objects or refuses to carry out a directive that the employee believes in good faith may violate a law, rule or regulation.
- Reports in good faith an abuse of authority
- Reports in good faith activities violating the Company's policies.

This list is only illustrative and not exhaustive

The superior of the employee who has reported any of the actions specified aforesaid is forbidden from taking the following actions against the employee

- Discharging the employee
- Threatening the employee
- Discriminating against the employee

## **2. Reporting Authority:**

Any employee who has a genuine complaint/concern about any fraud or violation of any law, rule or regulation or unacceptable, improper, practice and/or any unethical practice may complain about this to the designated person to attend to whistle-blowers as mentioned herewith below.

Employees can send their complaints to **Head HR** in writing who shall be responsible for the following functions:

- To receive and record any complaints under this policy.
- To ensure confidentiality of any “whistle-blowing” complainant.
- To prepare a report of any whistle-blowing complaint and send the report promptly to the MD after, for deliberation and decision.

## **3. Identity of Whistle Blower:**

This policy requires employees to put their names in the disclosures they make.

## **4. Confidentiality:**

Company will treat the disclosure made in a sensitive manner and will endeavor to keep the identity of the employee making an allegation confidential. However, the investigation process may inevitably reveal the source of information and the individual making the disclosure may need to provide a statement which cannot be kept confidential if legal proceedings arise.

## **5. Untrue / Malicious Allegations:**

If an employee makes an allegation which is not confirmed by a subsequent investigation and it is proved that the employee has made an untrue / malicious allegation, strict disciplinary action will be taken against the individual concerned.

## PREVENTION OF SEXUAL HARASSMENT

<b>Policy No</b>	<b>Old No</b>	<b>Revised No</b>
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### **Purpose**

The Company is committed to creating and maintaining an atmosphere in which our employees can work together, without fear of sexual harassment, exploitation or intimidation. Every employee should be aware that we are strongly opposed to sexual harassment and that such behaviour is prohibited both by the law and the Company policy. We intend to take all necessary action(s) required to prevent, correct and if necessary, discipline behaviour which violates this policy. This policy has been framed in accordance with the provisions of the "Sexual Harassment at Workplace (Prevention, Prohibition and redressed) Act, 2013. While the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

The term 'Esme' or 'Company' used in this Policy means Esme Consumer Private Limited and its subsidiaries

### **1. INDIVIDUALS AND CONDUCTS COVERED**

This Policy shall be respected by all and will be binding upon all employees, whether men or women, including, regular, temporary or ad hoc basis, a contract worker, probationer, trainee, apprentice or called by any other such name, persons employed in our workplace directly or through an agent or contractor, whether the terms of employment are expressed or implied. Men and women can both experience sexual harassment. Women can be sexually harassed by men and men may be sexually harassed by women. Same gender harassment (male to male or female to female) can also occur.

Sexual harassment is unacceptable in workplace and in any work-related activities whether in or outside the workplace including any place visited by the employee arising out of or during the course of employment including transportation provided by the Company for undertaking journey such as during business trips, business meetings and business- related social events.

Where harassment occurs to Esme employee as a result of an act by a third party or outsider while on official duty, all necessary and reasonable steps to assist the affected person to initiate action under applicable laws will be taken. The Head of such third party shall also be informed of such incident and an action/ enquiry for such action shall also be demanded from such third party.

### **2. DEFINITION OF THE TERM "Sexual Harassment"**

For purposes of this Policy one or more of the following unwelcome acts and behavior (whether directly or by implication) shall constitute sexual harassment:

- (a) physical contact and advances; or

- (b) a demand or request for sexual favours; or
- (c) making sexually coloured remarks; or
- (d) showing pornography; or
- (e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature such as loaded comments, remarks or jokes, letters, phone calls, SMS, emails or stalking, sexual demands whether by words, gestures or actions.

Following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- (a) implied or explicit promise of preferential treatment in an individual's employment; or
- (b) implied or explicit threat of detrimental treatment in an individual's employment; or
- (c) implied or explicit threat about individual's present or future employment status; or
- (d) interference with individual's work or creating an intimidating or offensive or hostile work environment; or
- (e) humiliating treatment likely to affect individual's health or safety.

It is discriminatory when the complainant has reasonable grounds to believe that his /her objection would disadvantage them in connection with employment, including recruiting or promotion or when it creates a hostile working environment.

The purpose of this Policy is not to outline every example of sexual harassment that is inconsistent with a work environment that promotes respect and dignity but to provide a broad guideline. Employees are expected to at all times to exercise sound judgment.

### **3. ESTABLISHMENT OF COMPLAINT REDRESSAL MECHANISM**

Internal Complaint Committee (ICC) has been formed consisting of the following to which the complaints be filed by aggrieved employee. Since Company does not have any senior level women employee in most of the office establishment, location, the below mentioned ICC shall take the matters related to Sexual Harassment from all establishment, no matter where such employee is located:

#### **Internal Committee for Prevention of Sexual Harassment**

Name	Mobile No.	Company Name	Email ID
Sonal Kapur Sinha	9971845888	Esme Consumer Presiding Officer	<a href="mailto:sonal.kapur@esmeconsumer.in">sonal.kapur@esmeconsumer.in</a>
Supriya Agarwal	9004280194	Esme Consumer Member	<a href="mailto:Supriya.agarwal@esmeconsumer.in">Supriya.agarwal@esmeconsumer.in</a>
Shan Kohli	9341857009	SASHA India External Member	<a href="mailto:shan@sashaindia.com">shan@sashaindia.com</a>
Siddhartha Khaitan	9910060090	Esme Consumer Member	<a href="mailto:Siddhartha.khaitan@esmeconsumer.in">Siddhartha.khaitan@esmeconsumer.in</a>

The Presiding Officer and every member of the committee shall hold office for period not exceeding 12 months from the date of their nomination. The retiring members may be reappointed at the sole discretion of the Company.

#### 4. COMPLAINT PROCEDURE

##### 4.1. Reporting of incident of sexual harassment

Esme strongly urges the reporting of all incidents of sexual harassment regardless of offender's identity or position. The aggrieved person shall follow the complaint procedure outlined below:

- (i) The complaint shall be made by email to presiding officer at "[sonal.kapur@esmeconsumer.in](mailto:sonal.kapur@esmeconsumer.in)" or be sent in writing to the Presiding Officer, Internal Committee, Esme Consumer Private Limited – Plot no-18 Sector-44, Gurgaon-122001
- (ii) The complaint shall be made in writing, in six copies, to the IC, along with supporting documents and name and address of the witnesses.
- (iii) In case if the complaint cannot be made in writing, the Presiding officer or member of the IC shall render all reasonable assistance to the complainant for reducing the complaint in writing.
- (iv) The complaint shall be made within a period of three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of last incident.
- (v) For reasons to be recorded in writing, the IC may extend the time limit not exceeding three months, if it is satisfied that the circumstances were such that prevented the employee from filing a complaint.

##### 4.2. Who can make complaint?

- (i) Aggrieved employee;
- (ii) Where an aggrieved employee is unable to make the complaint on account of physical incapacity, a complaint may be filed by:
  - (a) Aggrieved employee's relative or friend; or
  - (b) Aggrieved employee's co-worker; or
  - (c) An officer of the National Commission for Women or State Women's Commission; or
  - (d) Any person who has knowledge of the incident with the written consent of the aggrieved employee.
- (iii) Where an aggrieved employee is unable to make the complaint on account of mental incapacity, a complaint may be filed by:
  - (a) Aggrieved employee's relative or friend; or
  - (b) A special educator, who is a person trained in communication with people with special needs in a way that addresses their individual differences and needs; or

- (c) A qualified psychiatrist or psychologist; or
  - (d) The guardian or authority under whose care the aggrieved employee is receiving treatment or care; or
  - (e) Any person who has knowledge of the incident jointly with any one of the above-mentioned people (s).
- (iv) Where an aggrieved employee for any other reason is unable to make the complaint, it may be filed by any person who has knowledge of the incident with the written consent of the aggrieved person.
- (v) Where an aggrieved employee is dead, a complaint may be filed by aggrieved employee's legal heir or any person who has knowledge of the incident with the written consent of aggrieved employee's legal heir.

#### **4.3. What shall the IC do on receipt of complaint?**

Within seven working days of the receipt of the complaint the IC shall send one copy to the respondent.

The respondent shall within the period not exceeding ten working days from the date of receipt of the copy of the complaint reply to the complaint along with the respondent's list of documents and name and address of the witnesses.

The parties shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC.

### **5. INQUIRY INTO COMPLAINT**

#### **5.1. Conciliation:**

- (i) The IC may before initiating an inquiry and at the request of the complainant take steps to settle the matter through conciliation. Provided that no monetary settlement shall be made a basis of conciliation.
- (ii) Where a settlement has been arrived, the IC shall record the settlement so arrived, provide the copies of the settlement to the complainant and the respondent and forward the same to management to take action as specified in the recommendation.
- (iii) Where a settlement is arrived, no further inquiry shall be conducted by the IC.
- (iv) If the complainant informs the IC that any term or condition of settlement arrived has not been complied with by the respondent, the IC shall proceed to make an inquiry into the complaint.

#### **5.2. Inquiry:**

- (i) If conciliation is not preferred by the complainant, the IC shall conduct inquiry if the respondent is an employee.

- (ii) In conducting the inquiry, a minimum of three members including the Presiding Officer shall be present.
- (iii) The IC shall make inquiry into the complaint in accordance with the principles of natural justice.
- (iv) Where both the parties are employees of Esme Consumer, both the parities shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representations against the findings before the IC.
- (v) The IC shall have the right to terminate the inquiry proceedings or to give ex-parte decision on the complaint, if the complainant or the respondent fails without any sufficient cause to attend three consecutive hearings convened by the IC.
- (vi) Such termination or ex-parte order may not be provided without giving a notice in writing, fifteen days in advance, to the party concerned.
- (vii) The inquiry shall be completed within the period of ninety days.

## 6. RELIEF TO THE COMPLAINANT DURING PENDENCY OF INQUIRY

At the written request of the complainant, the IC may recommend the management to:

- (i) Transfer the complainant or the respondent to any other workplace; or
- (ii) Grant leave to the complainant up to a period of three months. The leave granted to the complainant shall be in addition to the leave he/she would be otherwise entitled; or
- (iii) Restrain the respondent from reporting on the work performance of the complainant or writing the complainant's confidential report and assigning the same to another officer.

The management shall implement the recommendations so made by the IC and send the report of such implementation to the IC.

## 7. WHAT SHOULD THE IC DO ON COMPLETION OF INQUIRY?

On completion of the inquiry, the IC shall provide a report of its findings to the management within a period of ten days from the date of completion of inquiry and this report shall be made available to the concerned parties.

### 7.1. If allegations are not proved

Where the IC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the management that no action is required to be taken in the matter.

### 7.2. If allegations are proved

Where the IC arrives at the conclusion that the allegation of sexual harassment against the respondent has been proved, it shall recommend to the management

- (i) to take such actions as the IC deems fit including written apology, warning, reprimand or censure, withholding of promotion, withholding of any pay rise or increments, terminating the respondent from the service or undergoing a counselling session or carrying out community service.
- (ii) to deduct, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved employee or his/her legal heirs, as it may determine.

In case the management is unable to make such deduction from the salary of the respondent due to his/her being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved employee.

In case the respondent fails to pay such compensation sum the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

The management shall act upon the recommendation within sixty days of its receipt by him.

#### **8. Complaints made with false or malicious intent:**

If the IC concludes after an inquiry that any allegation/complaint against the respondent is malicious or was made knowing to be false or forged or misleading documents were provided, the IC shall recommend action to the management, against the complainant and/or the witness as the case may be, as mentioned above in Clause 7.2.

A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this Clause.

#### **9. RETALIATION FOR SEXUAL HARASSMENT COMPLAINTS**

The management shall safeguard the complainant and witnesses from any form of retaliatory measures.

Strict disciplinary action will be recommended by the Internal Committee if it is established that the complainant or the witnesses were subject to retaliation in any form.

#### **10. CONFIDENTIALITY**

Subject to applicable laws, procedures and requirements, the contents of the complaint, the identity and addresses of the aggrieved employee, the respondent and the witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by the management shall not be published, communicated or made known to the public, press and media in any manner.

However, information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved employee and witnesses.

Any person who breaches confidentiality shall be liable for penalty as per applicable laws.

The IC shall in each calendar year prepare and submit with the management and the prescribed authority such annual report inter alia giving number of complaints filed before the IC, complaints disposed, complaints pending, action taken etc.

### **11. APPEAL**

Any person aggrieved with any of the recommendation of the IC or non-implementation of such recommendation or breach of confidentiality may prefer an appeal, to the court or tribunal as per applicable laws, within 90 days from the date of receipt of the recommendation.

### **12. DISSEMINATION AND REPORTING OF THE POLICY**

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read and understood the Policy.

A register shall be maintained and signed by the Presiding Officer by 10<sup>th</sup> of every month detailing complaints received in previous month, action taken / progress made against such compliant.

### **13. MISCELLANEOUS**

The Company shall:

- (i) display at any conspicuous place in the workplace, the penal consequences of sexual harassments and the details of constitution of the IC.
- (ii) organize workshops and awareness programmes at regular intervals for employees and orientation programmes and seminars for members of the IC.
- (iii) provide necessary facilities and information to the IC for dealing with the complaint and conducting an inquiry.
- (iv) assist in securing the attendance of the respondent and the witnesses before the IC.
- (v) Provide-assistance to the aggrieved employee if he/ she so chooses to file a complaint in relation to the offence under the applicable law.
- (vi) cause to initiate action, under the applicable law, against the perpetrator, or if the aggrieved employee so desires, where the perpetrator is not an employee.
- (vii) monitor the timely submission of reports by the IC.

ANNEXURE-SUMMARY OF TIMELINES

<b>Sn o</b>	<b>ACTION POINT</b>	<b>AUTHORITY / CONCERNED PERSON</b>	<b>TIME LIMIT</b>
<b>1</b>	Complaint	Complaint to be lodged before IC by the aggrieved person or such other person as detailed in Clause 4.2 of the Policy	1) Within a period of 3 months from the date of the incident, or 2) In case of series of incidents, within the period of 3 months from the date of last incident.
<b>2</b>	Initiation of inquiry proceedings	By the IC, by sending the copy of complaint to the Respondent	Within the period of 7 working days of receipt of the complaint.
<b>3</b>	Reply by the respondent along with his list of documents, names and addresses of witnesses	By the respondent to IC	Within 10 working days from the day of receipt of the copy of complaint forwarded by IC.
<b>4</b>	Completion of inquiry proceedings	By IC	Within 90 days from the date of receipt of complaint.
<b>5</b>	Submission of inquiry report and findings along with recommendations by IC	By IC to the Management	Within 10 days of completion of inquiry proceedings by IC.
<b>6</b>	Implementation of recommendations made in inquiry report of IC	By the Management	Within 60 days of the receipt of the recommendations made in the inquiry report by IC.
<b>7</b>	Appeal	By any person aggrieved with any of the recommendation of the IC or non-implementation of such recommendation or breach of confidentiality	Within a period of 90 days of recommendations by IC.

## GENERAL SECURITY POLICY

Policy No	Old No	Revised No
	NEPL/HR/003-001	ECPL/EPM/004
Version	Date of Release	Date of Applicability
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### Purpose

The purpose of this policy is:

- To lay down guidelines pertaining to Security at all our factory and warehouse premises.
- To safeguard the company's assets & property from any theft and damage.
- To ensure only authorized in & outward movement of men & material from Factory premises.

### Scope

This policy shall be applicable to all employees including contractual staff based out of factory. This policy covers entire infrastructure, property and all belongings of the company based within the factory premises.

### Policy Details

#### Do's and Don'ts at the Entry Gate

1. All employees shall need to carry their Identity cards while entering the Factory premises
2. All employees shall enter and leave the factory premises only by the gate or gates provided for the purpose by the company
3. The premise gates may remain closed during working hours at the discretion of management
4. Employees are liable to get all their belongings like carry bags, lunch bags etc. checked while entering the Factory premises
5. No restricted items like any weapon, explosive, tobacco or intoxicant material, cameras, matchbox, cigarette etc. shall be allowed inside the premises
6. Security Officer on duty shall be responsible for checking/ frisking of any on-roll or contractual staff. Every on-roll / contractual employee is expected to support at the time when frisking is being conducted.
7. Frisking can be done at any point of time during the working hours or in any shift or at the time of entering or exiting the premises.

8. Any employee who does not cooperate at the time of frisking / checking would be liable for disciplinary action.
9. Any employee leaving the premises during working hours must have permission in writing from the appropriate authority in the form of a gate pass, which shall be shown and submitted at the gate.

INTERNAL CIRCULATION ONLY

## IT SECURITY POLICY

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### **Purpose**

To strengthen internal control and prevent unauthorized and improper access to data, thereby ensuring the appropriate protection of information assets

### **Scope**

These rules are applicable to all authorized E-mail & Internet users in the company.

### **Policy Details**

It is against company policy to store non-work-related data on company equipment. Files that contain music, video, pictures are not to be stored on corporate equipment unless they have a business purpose and will be regularly checked and deleted.

#### **1. Desktop/Laptop Users**

Do not use the Desktop/ My Documents/ or any of the C:\ drive to store data. Use the network drives (If available on network) or D / E /F drive to store data. If anything, unexpected happens to your computer then we may not be able to retrieve any data that existed on the computer, if your data does not reside at the right place.

#### **2. What You Need to Do**

Data is your responsibility and you need to look through your data and ensure it is in the right place. If you need any help with moving the data or any clarification please contact someone in IT.

#### **3. Information Technology Uses - Guidelines**

##### **DO'S**

- a) All eligible new entrants shall be given workstations equipped with the necessary software/hardware. additional software hardware can be requested and shall be allocated once the relevant authorities/manager approves the Assets Requisition Format'
- b) All Information shall be shared on a need-to-know basis. Each user shall be given necessary (and restricted) access to the computers/shared network. It shall be mandatory to follow the access limits strictly.

- c) Employees shall be held responsible for inappropriate use of information, which they have access to. All passwords must be kept confidential and computers shall be locked/logged out from while away from them.
- d) The company shall have the right to monitor any and all of the aspects of the technology.
- e) Employees shall be required to read and follow the technology updates sent from time to time. These shall include tips for effective use of technology, information security, new technology and upgrades.
- f) All personal greetings, displays or messages on any technology shall be formal and professional.

#### DONT'S

- a) Employees are expected not to use company's technology for personal financial gain or profit.
- b) Carrying official information in printed or soft copy shall be prohibited without prior sanction from the manager. Any employee shall copy no information illegally.
- c) Employees shall not install or download any type of software on the computers. All software required for business purposes shall be installed and upgraded by the Information Technology Department.
- d) There shall be no toleration for the use of technology for any actions those are harassing or discriminatory.
- e) A breach of any of any of the above guidelines or not following the policy guideline shall lead to strict disciplinary action against the concerned employee.
- f) Using technology for entertainment shall be prohibited.
- g) Technology is linked hence inappropriate use of one technology can cause unintended consequences in another. An employee shall always consider the availability of resources for others as well as the overall operational efficiency of the technology system.

#### 4. Uses of Personal Computers & Laptops

#### DO'S

- a) Employees must maintain company's professional image and reputation in their use of the PCs & laptops.
- b) They may store only work-related programs or information on their PC, laptop or the servers.
- c) They must at all times be conscious that the hardware is networked and others may view files stored on their computer.
- d) Employees will be held responsible for the data stored on their machines, its security & use.

- e) The company reserves the right to replace, remove or recall hardware at any time.
- f) Separating employees who have been assigned PCs or laptops must return in working condition them prior to leaving.

**DON'TS**

- a) Employees are expected to strictly comply and must never share the hardware (PC or laptop) with friends or family members.
- b) Employees must not install unauthorized hardware devices or software on the machines that they have been assigned.

**5. Uses of Internet****DO'S**

- a) Certain employees may be provided with access to the Internet to assist them in performing their assigned tasks.
- b) Use of the Internet shall be tempered with common sense and good judgment.
- c) The company advises discretion in the material viewed or downloaded by users from the Internet.

**DON'TS**

- a) Sending mass mails or chain letters, playing games, engaging in online chat groups, printing multiple copies of documents, or otherwise creating unnecessary network traffic etc. is not permitted.
- b) Since audio, video and picture files require significant storage space; files of this or any other sort shall not be downloaded unless they are business related.
- c) Employees shall not have an expectation of privacy in anything they create, store, send, or receive on the computer system.

**6. Uses of Email & Email Client****DO'S**

- a) All messages distributed via the organization's email system, shall be the property of the company.
- b) Emails shall be monitored without prior notification if the company finds it necessary. If there is evidence that the employee is not adhering to the guidelines set out in this policy, the company reserves the right to take disciplinary action.
- c) Users shall take care in drafting an email as they would for any other communication.
- d) Confidential information should be encrypted prior to being sent via email.

**DON'TS**

- a) Employees shall not have an expectation of privacy in anything they create, store, send, or receive on the email system.
- b) It is strictly prohibited to:
  - i. Send or forward emails containing offensive text or images.
  - ii. Send unsolicited email messages or chain mail.
  - iii. Forward a message or copy a message or attachment belonging to another user without acquiring permission from the originator first
  - iv. Forge or attempt to forge email messages, or disguise or attempt to disguise one's identity when sending mail.

**7. Software Usage****DO'S**

- a) The company shall own all software and makes it available to employee according to need, under the terms of licensing agreements between the company and individual software vendors.
- b) If an employee leaves the company, any company-owned software in his or her possession must be returned.
- c) To use resources wisely, employees are expected to learn what existing software can do. The company reserves the right to revoke access to software applications or remove, delete or destroy any non-approved software on systems at any time.
- d) The Company reserves the Right to add/delete/modify any of the above detailed terms and clauses & subsequently the related versions shall be intimated to the employees.
- e) Only IT Department shall add/ load/delete/ edit/ execute any new required software.

**DON'TS**

- a) Employees shall not use DC-ROM to alter the existing software. Violation of the same shall be viewed as an offence and will be liable for disciplinary action.

**8. Rules & Conditions**

The rules & conditions are based on the general principles that all users must have the opportunity to appropriately use the IT facility and that none of the users may be disturbed and their privacy compromised. At the same time, employees are expected to use the Net and associated facilities responsibly and professionally, the user shall not attempt to disrupt, degrade or interfere with the normal operation of any IT service and facility.

The access to E-mail or Internet facility is subject to approval from the appropriate authority in the company and no employee can claim it as a matter of his/her right.

8.1 The use of E-mail / Internet shall be restricted to company's business only.

8.2 The use of E-mail / Internet for visiting job sites, personal or entertainment purpose or spreading political or religious views, downloading illegal software, downloading wallpaper, games, visiting porn sites, placing employee's confidential information on websites like Facebook, LinkedIn, and Twitter is strictly forbidden.

8.3 The users shall not misrepresent the content of any original official messages/communication while sending / forwarding the same to others.

8.4 All users are strictly warned not to deliberately transmit files that contain viruses or corrupted data. It is punishable misconduct.

8.5 It is forbidden to interfere with other users directly or indirectly.

8.6 The users shall not intercept, redirect or in any way interfere or attempt to interfere with the E-mail intended for others.

8.7 Users must comply with all company access procedures, including use of assigned user IDs and properly licensed software. User IDs and password for such IDs may not be shared and the users are advised to change their password at convenient intervals so that others may not get access to their IDs. Users are also advised to store their data in their local hard disks for retrieval and safety.

8.8 Any e-mail or other communication sent or received via the Internet must be appropriate for the workplace. Please note that e-mail is relatively permanent form of communication. Do not transmit anything in an e-mail message that you would not be comfortable writing in a letter. Deletion of an e-mail message does not eliminate backup copies of the message that is automatically stored electronically. Regardless of available security, it should be noted that the Internet is not adequately equipped to protect data that is considered highly sensitive confidential or personal.

8.9 The company does not normally monitor any individual's use of Internet service. But when policy violation is suspected, then with or without notice, the company reserves right to access or monitor the use of his/her internet.

8.10 This policy shall be communicated to the user at the time he/she is given access to Information Technology tools and services. The user must agree to comply with this policy to gain access.

8.11 While sending attached files such as spreadsheets or word-processed documents, use a version which is likely to be supported by the recipient.

8.12 The attachment should not be more than 15 MB.

8.13 Failure to adhere to the above Rules and Conditions shall result in severe disciplinary action or even termination of employment.