

POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

1.0 POLICY

1.1 The NCC Ltd. (**formerly Nagarjuna Construction Company Ltd**) (hereinafter known as "**NCC**") is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. NCC believes that all its employees have the right to be treated with equality without any discrimination. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

1.2 The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 mandates the companies to lay down guidelines and to form an Internal Committee for redressal of grievances related to sexual harassment.

2.0 APPLICABILITY

2.1 This Policy shall be applicable to NCC and all its Group Companies.

3.0 SCOPE AND EFFECTIVE DATE

3.1 This Policy extends to all employees of NCC and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3.2 "Employee" means any person on the rolls of the NCC including those on deputation, contract, temporary, part time, training or working as consultants.

3.3 The term 'Sexual harassment' includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- i. Physical contact and advances; or
- ii. A demand or request for sexual favours; or
- iii. Making sexually coloured remarks; or
- iv. Showing pornography; or
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- vi. Implied or explicit promise of preferential treatment in her employment; or
- vii. Implied or explicit threat of detrimental treatment in her employment; or
- viii. Implied or explicit threat about her present or future employment status; or
- ix. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- x. Humiliating treatment likely to affect her health or safety.

POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

4.0 INTERNAL COMPLAINTS COMMITTEE

4.1 Internal Complaints Committee (“**Committee**”) has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Presiding officer and Members of the Committee are as follows:

Committee Members:

i.	Mrs. Chandana Suram	Presiding Officer
ii.	Mrs. P. Vijaya Lakshmi	Member
iii.	Mrs. V. Hymavathi	Member
iv.	Mrs. G Sri Jhansi Lakshmi	Member
v.	Mrs. Anusha Kolaventi	Member
vi.	Mrs. D Hemalatha	Member
vii.	Mr. V V A P Krishna Murthy	Member
viii.	Mr. G V K Raju	Member
ix.	Mr. V Ramamurthy	Member
x.	Mr. G Sravana Kumar	Member
xi.	Mr. M P Raju	External Member

4.2 A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer, at least two members, one of whom shall be a lady.

5.0 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 the Committee in writing as early as possible but within one month from the date of the incident and in case of a series of incidents, within a period of one month from the date of last incident.

5.2 Before initiating any inquiry on the complaint & at the request of the aggrieved woman, the Committee shall take steps to settle the matter between her and the Respondent through conciliation and copies of such settlement shall be provided to the Complainant & Respondent.

In case of settlement is arrived at, no further inquiry shall be conducted by the Committee.

5.3 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.

5.4 The Committee will hold a meeting with the Complainant within five (5) days of the receipt of the complaint, but no later than a week.

POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

- 5.5 The first meeting, the Committee shall hear the Complainant and record her allegations. The Complainant can also submit any material oral or written to substantiate her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer shall meet and record the statement.
- 5.6 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to her/him to give explanation, where after, an "**Enquiry**" shall be conducted and concluded.
- 5.7 In the event, the complaint does not fall under the purview of Sexual Harassment; the Committee shall cease to conduct Enquiry after recording the reasons thereof.
- 5.8 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- 5.9 Corrective action may include any of the following:
- a) Formal apology
 - b) Counseling
 - c) Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d) Change of work assignment transfer for either the perpetrator or the victim.
 - e) Suspension or termination of services of the employee found guilty of the offence.

6.0 ENQUIRY PROCESS

- 6.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Respondent.
- 6.2 The Committee shall prepare and handover the Statement of Allegation to the Respondent and give her / him an opportunity to submit written explanation if he so desires within seven (7) days of receipt of the same.
- 6.3 The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.

POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

- 6.4 If the Respondent desires any witnesses to be called, he shall communicate in writing to the Committee the names of witness/es whom he desires to be examined.
- 6.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she shall supply original copies of such documents. Similarly, if the Respondent desires to tender any documents in evidence before the Committee he shall supply original copies of such documents.
- 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 the Respondent for putting forward and defending their case.
- 6.8 The Committee shall complete the "Enquiry" not beyond three (3) months from the date on which the written complaint is filed by the Complainant and communicate its findings & recommendations for action to the HR Department. 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.
- 6.9 HR Department shall take appropriate action on the Enquiry Report of the Committee.
- 6.10 The Committee shall be governed by Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 as amended from time to time.

7.0 OTHER POINTS TO BE CONSIDERED

- 7.1 The Committee shall recommend to the HR Department the action against the erred employee which may include transfer, dismissal or any 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, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 7.4 The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to the HR Department

POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

7.5 In case the Committee finds 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.

7.6 The name of the aggrieved employee shall not be referred to or revealed in any records of proceedings by the Committee/NCC to any press / media or any other persons whilst reporting the proceedings / case.

8.0 PROTECTION TO COMPLAINANT:

8.1 NCC is committed to ensuring that no employee who brings forward a harassment concern subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

8.2 NCC will ensure that the Complainant or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure by maliciously putting an allegation knowing it to be untrue will be subject to disciplinary action.

9.0 CONFIDENTIALITY: All inquiries, complaints and investigations are treated confidential. Information shall be revealed strictly on a need-to-know basis. However, the identity of the complainant usually is revealed to the Respondent and witnesses. All individuals contacted in connection with a complaint will be counseled that any information pertaining to the complaint shall be held in confidence.

ANNEXURE - INTERNAL COMPLAINTS COMMITTEE

Organization Type	Private
Organization Name	NCC Limited
Branch Name	Corporate Office
No.of departments/Wings	10
Name of the departments/Wings	Buildings, Roads, Oil&Gas, Electrical,W&E, Railways, Irrigation, Metals, Mines,Power
Address	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
Pincode	500081
Email of Organization/HR	ho.hr@nccltd.in
Mobile Number of HR	9908977899
Phone Number(Landline)	040-23268888
District	Rangareddy
Mandal	Serilingampally
Panchayath	GHMC - Serilingampally
Date of ICC Formation	09-12-2013

ICC Internal Members

Employee Name	Gender	Designation	Position	Mobile No.	Mail Id	Address
Chandana Suram	Female	Deputy General Manager	Presiding Officer	8008684141	chandana.suram@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
P Vijayalakshmi	Female	Deputy General Manager	Member	9704890667	vijayalakshmi.p@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
V Hymavathi	Female	Chief Manager	Member	9491213802	hymavathi.v@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad

G Sri Jhansi Lakshmi	Female	Senior Manager	Member	9490867366	jhansi.g@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
Anusha Kolaventi	Female	Manager	Member	7396008532	anusha.k@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
D Hemalatha	Female	Deputy Manager	Member	8121015219	hemalatha.d@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
G V Krishnam Raju	Male	Chief General Manager	Member	9908977899	raju.gvk@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
V V A P Krishna Murthy	Male	Joint General Manager	Member	8008224546	krishnamurthy.vinjamuri@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
Gorantla Sravana Kumar	Male	Senior General Manager	Member	9154456474	sraanakumar.g@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad
V Rama Murthy	Male	General Manager	Member	7331101448	ramamurthy.v@nccltd.in	NCC House, Survey No.64, Near Durgam Cheruvu, Madhapur, Hyderabad

ICC External Members

Name	Gender	Designation	Mobile No.	Email ID	NGO/ADVOCATE /EXPERTISES ON WOMEN ISSUES	Address
M Peddi Raju	Male	Consultant	9989082246	mantenapraju@gmail.com	Sirisha Memorial Charitable Trust, Pedakanjarla, Paten cheruvu, Hyderabad	Flat No : 102, Elegant Apartments, ASIF Avenue, Raj Bhavan, Somajiguda, Hyderabad