

NAVOTI ANALYTICS PRIVATE LIMITED (NAPL)
POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE
("NAPL POSH POLICY")

Objective

NAPL as a responsible corporate does not tolerate any form of harassment or discrimination or exploitation or intimidation ("Elements"), and intends to contribute, create and provide fair and hostile work environment by ensuring the workplace is free from such elements and more particularly Sexual Harassment ("SH").

NAPL intends to prevent, deter, prohibit such occurrence or commission, provide system of reporting, redressal of complaints and protect in matters related to Elements and SH.

Applicability

This policy is intended to be gender neutral and with more specific on women and comes into effect from **30/04/2024**.

This policy is deemed to be incorporated in the service conditions of all Employees of the NAPL.

This policy may be further amended by NAPL from time to time, and any such amended policy will be duly notified in writing by NAPL and shall be applicable accordingly.

In case of any amendment(s), notification(s), guideline(s), clarification(s), circular(s) etc., ("Changes") issued by the relevant authorities, not being consistent with the provisions laid down under this policy, then such Changes shall prevail upon the provisions hereunder and this policy shall stand amended accordingly from the effective date as laid down under such Changes.

Nothing contained in this policy shall prevent any victim of SH to seek any additional remedy available under civil or criminal law, as in force from time to time.

Scope

This policy is in line with **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the rules made thereunder ("Act").

This policy scope is restricted to:

- a) Workplace of NAPL, any other locations where NAPL has its place of work, virtual or remote mode of working and interactions through any online electronic mode.
- b) Any places visited by an Employee arising out of or during the course of employment or engagement with the NAPL.
- c) Transportation provided by the Employer for undertaking any journey or travel for the purposes of (a) and/or (b) and/or (c) above.



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Policy Statement

The Employees of the NAPL are strictly refrained and prohibited from engaging in any form of Sexual Harassment at Workplace ("SHW") and especially Sexual Harassment of Women at Workplace ("SHWW").

The occurrence of any such act of SHW and/or SHWW is treated as a gross misconduct and strict action shall be taken against them, and shall be punishable in accordance with the policy of the NAPL and other applicable civil or criminal law.

Making a false claims or allegations or complaint of SHW and/or SHWW or providing false or misleading or malicious information / statement / document / declaration regarding a complaint will also be treated as a violation of policy and appropriate disciplinary action would be taken against the complainant.

All complaints shall be addressed in compliance and in accordance with the provisions of the Act seriously, expeditiously, sensitively and with full confidentiality.

All Employees will be protected against victimization, retaliation for filing or reporting a complaint on SH and will also be protected from false accusations.

Definitions

a) **Aggrieved Associate or Employee** means in relation to a workplace, any individual, of any age whether employed in the Company or not, who alleges to have been subjected to any act of Sexual Harassment by the another associate of the Company.

b) **Employee** means a person employed at workplace for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

c) **Employer** means any person responsible for the management, supervision, and control of the workplace.

d) **Workplace** means office of NAPL, any other locations where NAPL has its place of work, including virtual or remote mode of working, interactions through any online electronic mode, any places visited by an Employee arising out of or during the course of employment or engagement with the NAPL and transportation provided by the Employer for undertaking any journey or travel for the purposes of work.

e) **Sexual Harassment** includes any one or more of the following unwelcome acts or behaviours (whether directly and/or indirectly and/or by implication):

- I. Physical contact and / or advances and / or sexual advance; or
- II. Demand or request or offer for sexual favour; or



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- III. Making or sharing sexually coloured remarks; or
- IV. Showing, displaying or sharing pornography or
- V. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The list of instances mentioned above is illustrative and not exhaustive and include:

- I. Making (or sharing) gestures or sounds, including but not limited to teasing, epithets, innuendos, jokes, pranks, comments of a sexual nature, whether generic or about a person and/or their body or clothing, sexual orientation, sexual prowess, or other expressions which have a sexual connotation/overtone; or
- II. Showing, displaying or sharing erotic or obscene material or content including images, pictures, posters, screensavers, objects, gifts, signs or other material of a sexual nature or having a sexual connotation; or
- III. Repeatedly asking to socialise after work hours, or following or contacting/attempting to contact a person repeatedly to foster personal interaction; despite a clear indication of disinterest by such person; or
- IV. Asking questions about another person's sexual conduct, or sexual orientation, or volunteering information about the sexual conduct of oneself or others; or

Explanation:

Any of the aforesaid acts, conduct or behaviours will, for the purposes of this policy, amount to SH, irrespective of whether such act, conduct or behaviour was committed:

- in written, printed, graphic, verbal, gestural, audio-visual, virtual, electronic, or other forms,
- in person, or when working from home, or through any mode or channel of communication including phone calls, audio or video calls/meetings, virtual spaces, technology platforms and applications, texts, instant messaging, emails, through social media, social networking websites / applications / platforms or otherwise.

Further, the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of SH may also amount to SH for the purposes of this policy: or

- I. Implied or explicit promise of preferential treatment at employment; or
- II. Implied or explicit threat of detrimental treatment at employment; or
- III. Implied or explicit threat about present or future employment status; or
- IV. Interference with work or creation of an intimidating or offensive or hostile work environment for employee; or
- V. Humiliating treatment is likely to affect health, safety or self-esteem.

Any such or similar behaviour or act which may be perceived as SH by the Aggrieved Associate of Employee may be considered so, if agreed by the Internal Committee as per the provisions of the Act.



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Basic Do's and Don'ts at Workplace:

- I. **Proper Attire / Appropriate Dress** - Employees attending workplace, any places visited by an Employee arising out of or during the course of employment or engagement with the NAPL and while participating in any video call / chat / conferences / any other interactions must be dressed appropriately as expected in any professional environment which everybody follows.
- II. **Content of Conversation** - Keep the conversation specific to work areas, projects, deliverables and matters relating to work only.
- III. **Advance Information** - Please inform to Employee if the call or any other interaction is likely to be audio or video well in advance except under unforeseen business emergencies.
- IV. **Employee Privacy** - Please be sensitive for employee privacy and try to restrict interactions after office working hours and do not insist on video calls and restrict to audio calls only.
- V. **Behave Professionally** - Please behave professionally at all times respecting each other, understand, appreciate, protect the rights of the individual and treated with dignity.
 - *Know your policy and ask for clarifications if required.*
 - *Walk away from uncomfortable situations.*
 - *Say "NO" to offensive behaviour as soon as it occurs.*
 - *Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable.*
 - *Never do any act of verbal or non-verbal or physical harassment.*
 - *Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this policy.*

Constitution of Internal Committee (IC)

NAPL shall by order in writing, constitute Internal Committee ("IC") as the provisions of the Act to address any complaints of SHW and SHWW by conducting an inquiry. The IC shall abide by the obligations and duties as prescribed under all applicable laws, the Act and this policy.

The Act has vested the IC with certain powers that a Civil Court has under the Code of Civil Procedure, 1908 and has powers of: (a) summoning and enforcing the attendance of any person, and examining him/her/them on oath, and (b) requiring the discovery and production of documents; as are provided to a Civil Court under the Code of Civil Procedure, 1908.

The present Members of the IC nominated by Employer are:



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Name	Designation	Designation	Category (Internal/ External)
Mrs. Jyoti Priya	CEO	Presiding Officer	Internal
Mr. Amit Kumar	Chief People and Growth Officer	Member	Internal
Ms. D Bharathi	Data Analyst	Member	Internal
Mr. Pawan Jain	PCS M/s.Pawan Jain & Associates, Company Secretaries, Gachibowli, Hyderabad.	Member	External *

Name	Contact No.	Email
Mrs. Jyoti Priya	9985526504	jyoti.priya@navotianalytics.com
Mr. Amit Kumar	9871007368	amit.kumar@navotianalytics.com
Ms. D Bharathi	9560988186	d.bharathi@navotianalytics.com
Mr. Pawan Jain	9800795803	cspawanjain@gmail.com

* One outside member nominated should be from amongst Non-Government Organizations or Associations committed to the cause of women or a person familiar with the issues relating to SH, whose fee or allowances shall be fixed by the Employer and also at the time of conducting the proceedings of the IC and revised from time to time.

The Presiding Officer ("Chairperson") and each Member of the IC shall hold the position for three (3) years from the date of nomination.

The Chairperson or any Member can be removed from the IC due to contravention of any of the provision of the Act or other disqualifications as defined in Section 4(5) of the Act.

NAPL may re-constitute the IC as required from time to time, within the stipulated requirements under the Act.

The IC shall hold at least 1 meeting in a year. However, in case, it receives any complaint pertaining to matter of SH, then the IC shall be competent to proceed with the investigation accordingly.



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The quorum for holding any meeting of IC shall not be less than 3 members, provided that in every meeting of IC the presence of the External Member is mandatory. However, during preliminary inquiry, presence of External Member may not be required.

Grievance Resolution Procedure - 1

Upon incident of SHW / SHWW reported by the Aggrieved Associate or Employee;

IC before initiating an Enquiry and at request of Aggrieved Associate or Employee can decide to settle the matter through Conciliation; and

If matter is settled then IC shall record the settlement and send a copy to Employee to take action as specified in the recommendation.

IC shall provide copy of the settlement shall be given to Aggrieved Associate or Employee, respondent and witnesses and no further enquiry shall be conducted by the IC.

If matter is not settled then IC shall inform the same to Employer and initiate the enquiry into the compliant and close the compliant as per provisions of the Act.

Grievance Resolution Procedure - 2

Upon incident of SHW / SHWW reported by the Aggrieved Associate or Employee;

If the Aggrieved Associate or Employee decides to settle the matter without Conciliation and gives a formal written compliant to the IC

IC shall start enquiry into compliant and close the compliant as per the provisions of the Act.

Explanation:

Anyone can refer the details / provisions / rules given in Chapter IV and V of the Act which are placed in NAPL website so as to maintain transparency in matters starting from compliant till compensation stage.

In case of any difficulty in understanding the details / provisions / rules, they can approach to Presiding Officer, who shall assist and make them understand the same until their satisfactory.

Prohibition of publication or making known content of complaint or inquiry

The contents of the complaint made under the policy, identity and addresses of the Aggrieved Associate or Employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC and the action taken by NAPL shall not be published, communicated or made known to the public, press and media in any manner:

Provided that information may be disseminated regarding the justice secured to any victim of SH without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Aggrieved Associate of Employee, respondent and witnesses.



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Responsibilities of Employer

The Employer shall :

- I. provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- II. display at any conspicuous place in the workplace, the penal consequences of SH;
- III. organize workshops and awareness programmes at regular intervals for sensitizing the Associates with the provisions of the Act and orientation programmes for the members of the IC in the manner as may be prescribed;
- IV. provide necessary facilities to the IC for dealing with the complaint and conducting an inquiry;
- V. assist in securing the attendance of respondent and witnesses before the IC;
- VI. make available such information to the IC as it may require having regard to the complaint made;
- VII. provide assistance to the Aggrieved Associate of Employee if he/she so chooses to file a complaint against the respondent in relation to the offence under the Indian Penal Code or any other law for the time being in force;
- VIII. cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the Aggrieved Associate so desires, where the perpetrator is not an Associate, in the workplace at which the incident of sexual harassment took place;
- IX. treat SH as a misconduct under the disciplinary policy of the Company and initiate action for such misconduct;
- X. monitor the timely submission of reports by the IC.

Responsibilities of Employees

All Employees of NAPL have a personal responsibility to ensure that they have read the policy document and follow the same.

Annual Report

The IC shall in each calendar year prepare and submit to Employer an annual report which includes:

- I. Number of complaints of SH received in the year;
- II. Number of complaints disposed off during the year;
- III. Number of cases pending for more than 90 days;
- IV. Number of workshops or awareness programme against SH carried out; and
- V. nature of action taken by the Employer.

In case no complaints or issues are reported the IC shall submit NIL report.

Policy Availability

The Policy will be available to all Employees on <https://navotianalytics.com/About/News>

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 will be available to all Employees on <https://navotianalytics.com/About/News>



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