

DISA India Limited
Gender Neutral Policy Zero Tolerance Towards Sexual Harassment

1. Objective:

- a) To provide a safe working environment for all employees at the workplace.
- b) To ensure prevention, prohibition, and redressal of sexual harassment at workplace.
- c) To constitute an Internal Complaints Committee.
- d) To respond to and investigate all reports of sexual harassment as per the Act.

2. Applicability:

This policy is applicable to Head Office & All branch offices, Manufacturing Plant. Any party can be a victim or perpetrator of sexual harassment and therefore, this policy is gender neutral. The policy covers any person employed at DISA for any work on regular, temporary, ad hoc or daily wages basis, either directly or through an agent, including a contractor, whether for remuneration or not, or working on voluntary basis or otherwise whether the terms of employment are express or implied and includes a co-worker, a contractor worker, probationer, trainee, apprentice, a visitor or called by any other such name.

- Sexual harassment of any employee at Workplace is a misconduct under the service rules and the Management will initiate action for such misconduct as per the Act.
- Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication)
 - a. Physical Contact and advances or
 - b. A demand or request for sexual favors, or
 - c. Making sexually colored remarks, or
 - d. Showing pornography, or
 - e. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature
- 3. The following circumstances, among other circumstances, if it occurs or present in relation to or connected with any act or behavior may amount to sexual harassment.
 - a. Implied or explicit promise of preferential treatment in her/his employment, or
 - b. Implied or explicit threat of detrimental treatment in her/his employment, or
 - c. Implied or explicit threat about her/his present or future employment status, or
 - d. Interference with her/his work or creating an intimidating or offensive or hostile work environment for her/him, or
 - e. Humiliating treatment is likely to affect her/his health or safety.
- 4. As prescribed by the Act, Management has formed the Internal Complaints Committee, for covering the head office & Branch offices, Manufacturing Plant.

The committee comprises of

Name	Representation	Mobile Number	Mail ID
Nithya Krishnamurthy	External Member – BCP Associates	+91 9036802679	nithya.k@bcpassociates.com
Stephys Udayakumar	Presiding Officer	+91 9972300428	Stephys.u@norican.com
Sowbhagya Murthy	Member – Corporate Office	+91 9945539308	Sowbhagya.murthy@norican.com
V N Satyanarayana	Member – Corporate & Regional Office	+91 9900204755	Satya.vn@norican.com
A Geetha	Member – Corporate & Regional Office	+91 9343368218	Geetha.ananda@norican.com
Manjunatha V	Member – Tumkur	+91 9945539342	v.manjunatha@norican.com
Venkatesha M	Member – Tumkur	+91 9945539318	Venkatesha.m@norican.com
Srikantaswamy Gowrisha	Member – Tumkur	+91 9972303891	Gowrisha.s@norican.com

5. Any aggrieved employee may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee within a period of three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident.
6. Where the aggrieved employee is unable to make a complaint on account of her/his physical or mental incapacity or death or otherwise, her/his legal heir or such other person as prescribed may make a complaint.
7. The Internal Committee, at the request of the aggrieved employee, takes steps to settle the matter between her/him and the respondent (perpetrator) through conciliation.
8. Where the aggrieved employee informs the Internal Committee that any terms of the settlement arrived at under the conciliation has not been complied with by the respondent, the Internal Committee shall proceed to make an enquiry into the complaint or, as the case may be, forward the complaint to the police.
9. Where both the parties are employees, the parties shall, during the course of enquiry, 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 representation against the findings before the committee.

- 10.** On completion of an enquiry under the Act, the Internal Complaints Committee as the case may be, shall provide a report of its findings to the employer, or as the case may be within a period of ten days from the date of completion of the enquiry and such report be made available to the concerned parties.
- 11.** Where the Internal Committee, as the case may be, arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take action for misconduct.
- 12.** The employer shall act upon the recommendation of the committee within sixty days of its receipt by him/her.
- 13.** Where the Internal Committee, as the case may be arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer as the case may be to take action against the employee or the person who has made the complaint.
- 14.** The Internal Committee, as the case may be, shall in each calendar year prepare an annual report and submit it to the employer.
- 15.** The employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of the Organization.

In case of any grievances/ concerns related to the sexual harassment of any employee at workplace, you may either contact over phone or write to the Internal Complaints Committee,

Mail Id - complaints.india@norican.com.

The Internal Committee Member's Name & Contact number is displayed on the notice board.

Signed by:

Lokesh Saxena

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Lokesh Saxena
Managing Director & CEO