



# GIRIRAJ CIVIL DEVELOPERS LIMITED

## HR Policy Manual

14 September 2025

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## HR POLICY MANUAL

This Human Resources (HR) Policy Manual is provided as a central reference for all managers, supervisors and employees and applies to staff across all locations where the Company carries out its work.

The specific policies that follow promote the philosophy of **Giriraj Civil Developers Limited** ("the Company") with regard to standards of excellence; terms of employment; employee development; and employee services.

It may be necessary to change these policies from time to time to reflect changes in the workforce, employment trends, economic conditions and change in laws. However, any changes in policy will be consistent with the Company's approach to:

- Employing talented individuals whose creativity and imagination will support and contribute to achieving the Company's business objectives;
- Communicating Company standards and expectations in all aspects of employment including performance;
- Valuing diversity, and assure equal employment opportunity and a workplace where relationships are based on mutual respect;
- Treating all staff, workers, contractors and customers in a professional, non-discriminatory manner;
- providing safe, effective working conditions, and;
- providing competitive terms and conditions in our workplace market

Any Policy changes will be fully consulted on and communicated to all staff through normal communication channels. This Policy Manual will also be updated as necessary.

This Policy Manual should be read in conjunction with the Code of Conduct for Employees.

Signed: \_\_\_\_\_

A handwritten signature in blue ink, appearing to read 'R. Bangoura'.

Chairman / Managing Director / Chief Executive Officer

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## Introduction

**GIRIRAJ CIVIL DEVELOPERS LIMITED** (“the Company”) is one of the leading qualified contractors in India, directed by a highly qualified, experienced, and technical team. Over a period of time, the company achieved its position in the core of the contracting business in India through highly skilled teams of professionals and workers. In the last few years, the company has advanced rapidly and effectively accomplished numerous projects, proving us reliable contractors in various disciplines of civil construction projects. We are quality and time-conscious contractors and have a proven track record of keeping the time cost factor as our main consideration.

The Company was incorporated as a Private Limited Company under the Indian Companies Act, 1956 pursuant to a Certificate of Incorporation dated October 19, 2005, issued by the Registrar of Companies, Mumbai as “**GIRIRAJ CIVIL DEVELOPERS PRIVATE LIMITED**” having its registered office in Mumbai. The company has converted from a private limited to a public limited company with effect from the 22<sup>nd</sup> day of January 2018. Furthermore, the company has been listed on the National Stock Exchange under the SME segment w.e.f. the 2<sup>nd</sup> day of April 2018.

The company specializes in Railway civil construction work such as Railway Station Building, Road over Bridge (ROB), Foot Over Bridge (FOB), Car Shed, Railway Yard, laying and fitting of track, Earthworks, Officer Residential Building, and numerous other infrastructure and construction work awarded by local government authorities, such as the construction of roads, expansion of roads, construction of community halls, government schools, development of gardens, and repair and maintenance of such activities.

We have accomplished several turnkey projects in civil construction and provided comprehensive construction services and core solutions to the construction industry. We deliver our services in planning and estimation, design, construction, and maintenance, ensuring to carry out all scopes of work with safe and cost-effective methods to comply with quick, efficient, and quality work.

## **1. Code of conduct policy**

The Employee Code of Conduct policy sets forth the standards of behaviour expected from employees in their interactions with colleagues, supervisors, and the organization as a whole. It underscores the importance of transparent communication, professionalism, mutual respect, and compliance with legal requirements. Additionally, it delineates the consequences for any breaches of these standards.

## **2. Equal Employment Opportunity Policy (EEO Policy)**

The Equal Employment Opportunity Policy emphasizes the importance of fairness and diversity within the workplace, ensuring that all aspects of employment remain free from discrimination based on protected characteristics. This policy promotes an environment where the rights of every individual are respected and valued, from the hiring process to termination.

Key components of this policy include clear definitions of protected attributes such as age, gender, ethnicity, and religion, guidelines to ensure fairness in all stages of employment, and procedures for reporting violations with outlined disciplinary actions for non-compliance.

### **Objective of Equal Employment Opportunity Policy:**

Indian constitution encompasses social safeguard measures for all citizens of India in Article 15 and Article 16. Article 15 mandates prohibition of discrimination on grounds of religion, race, caste, sex or place of birth. Article 16 mandates equal opportunity in matters of public employment. Article 16(2) further states that no citizen shall, on grounds only of religion, race, colour, caste, sex, descent, place of birth, residence or any of them, be ineligible for or discriminated against in respect of any employment or office under the State. The Company has endeavoured to capture the spirit of the above national and international statutes in EEO and Anti-Discrimination Policy. The Company is committed to promoting equal employment opportunities and a workplace that is free of all forms of discrimination. Equal opportunity means that all staff experience fairness, impartiality and equal access to all career initiatives in the Company. The Company's commitment to equal opportunity promotes an inclusive work environment that values and accepts the diverse cultural and social backgrounds of its staff.

## **3. Workplace health and safety policy**

The Workplace Health and Safety policy underscores the company's dedication to fostering a safe and hazard-free environment for its employees. It comprehensively outlines preventive measures, emergency protocols, and supplementary actions aimed at promoting health and safety standards. This policy highlights the significance of adhering to established guidelines and procedures to mitigate risks effectively.

Key elements encompass preventive action guidelines, which detail risk assessments, job hazard analysis, and strategies to prevent workplace-related injuries or illnesses. Additionally, it includes emergency management provisions addressing plans for responding to sudden catastrophes such as fires, floods, and other emergencies. Furthermore, the policy emphasizes additional measures such as regularly updating the policy in alignment with legislative changes, analyzing past incidents for improvement, and establishing clear procedures for accident reporting.

## **4. Leave and time off policy**

The Paid Time Off (PTO) Policy outlines the provision of paid leave offered to employees on an annual basis, covering vacation time that can be utilized at the employee's discretion. It's essential and one of the policies every organization should have.

It delineates the accrual process, usage guidelines, and distinguishes PTO from other forms of leave.

Essential components to include in this policy involve defining and differentiating PTO from other types of leave, specifying the accrual process, including the amount of PTO offered to various categories of employees. Additionally, it should detail procedures for requesting PTO and provide guidelines on its usage throughout the year.

### **Eligibility:**

All regular and confirmed employees of the organisation are covered in the leave policy. Employees who are on probation or hired as trainees will not be eligible for **any type of** leave. Leave year begins from **1st of April to 31st of March** each year and will be available only upon completion of each year of service. Leave will be credited to individual employee's leave account in advance at the beginning of the year (or from the date of confirmation), and employees can avail of leave in advance during the year. Employees who have joined during the year will be eligible for prorated leave from the date of joining the organization but will be credited to employee leave account on confirmation of employment. For the sake of clarity, no employee in probation period is entitled for any leave other than sick leave.

### **Other Conditions**

It is the responsibility of employees to ensure that their respective Managers take appropriate action on the leave applications before proceeding on leaves.

Leave availed in an emergency and only under unavoidable circumstances must be regularised in the system as soon as possible, which otherwise will result in loss of pay.

If an employee leaves the organisation or becomes ineligible for leaves for whatever reason, leave availed in excess of eligibility will result in loss of pay (LOP).

Employees are not allowed to merge two types of leave continuously.

Extended SL must be accompanied by a doctor's certificate and forwarded to HR for action with the consent of the Manager

#### **A. Types of Leave:**

##### **A 1. Earned Leave**

All confirmed employees are eligible for **15 (Fifteen) Days** of Earned Leave (EL) per completed year of service. However, employees can avail leave during the year in advance as and when credited to their respective accounts.

Any un-availed EL during the year will be carried forward to the extent of the next year and included in the next year's quota. EL can be accumulated up to a maximum of 15 Days during a year, and if not accumulated will be considered as lapsed. No additional monetary/non-monetary compensation will be given to the employee in lieu of any lapsed EL.

Leave encashment is allowed only upon resignation or termination of the contract and where the employee has un-availed EL leave balance. Encashment is based on monthly basic salary, divided by 30 days of the month and multiplied by the number of days of un-availed leave balance of the employee.

**Procedure to avail EL:** Employees shall plan their EL well in advance and apply to HR through their respective managers. The employees are permitted to avail the EL after the approval of their respective line managers only. Before proceeding the EL, the employees shall handover their duties, files, system passwords, and work in hand to another employee identified and designated by the line managers. In case of any urgency the employees shall be available on regular communication channels (voice calls, SMS, WhatsApp, etc) for short discussions.

#### **A.2. Sick Leave**

All employees are eligible for **7 (Seven) Days** of SL per annum. SL cannot be availed for more than **3 (three) days** at a time. In case of SL availed for more than 3 days, it should be accompanied by a registered medical practitioner's certificate.

Sick leave cannot be carried over to the next year or cashed out when an employee leaves their job and laps automatically at the end of the financial year.

**Procedure to avail SL:** Employees are urged to keep their managers informed of their sickness at the earliest in order to allow them to plan for continuity of tasks on hand.

#### **A.3. Maternity Leave**

The Maternity Benefit Act 1961 applies to all women employed in factories, mines, plantations, and organisations with 10 or more employees.

The Maternity Benefit Act 1961 states that a woman should have worked with her employer for at least 26 weeks in preceding the date of her expected delivery. If she fulfils this requirement, then she can utilise this mandated maternity leave and any further leave or benefits that she is entitled under the said Act.

Besides, additional paid leaves can also be granted based on the health and situation of the mother and her baby. It is to be noted that denying maternity benefits to female employees can attract some serious legal consequences, including imprisonment, for the employer.

Employers are mandated to pay full wages to the employee on maternity leave. The rate at which salary is disbursed is calculated based on her actual daily wages during the three months before her leave duration.

Employers must not employ a woman up to 6 weeks after her delivery, miscarriage or medical termination of pregnancy. In simple words, at least a 6-week rest period should be provided.

The employer can not dismiss or fire the employee who is on maternity leave. Doing so is a punishable offence. A legal notice or maternity leave application must be given to the employer by the pregnant employee before going on maternity leave. The same applies to rejoining the company after delivery.

#### **A.4. Paternity Leave**

The purpose of this policy is to support employees during the birth or adoption of a child and to promote work-life balance by providing paternity leave to eligible male employees.

**Eligibility:** An employee shall be eligible for paternity leave if:

- He is a confirmed employee at the time of childbirth or adoption
- The leave is availed for:
  - Birth of a child, or
  - Legal adoption of a child below the age of one year.
- The employee has **not exceeded two surviving children**

**Duration of Paternity Leave :** Eligible employees are entitled to-

- **7 calendar days** of paid paternity leave.
- Leave must be taken: Up to 7 days before the expected date of delivery, **or** Within 6 months from the date of birth/adoption

Paternity leave cannot be split unless approved by the reporting manager/HR.

### **Misuse of Leave:**

If paternity leave is found to be misused or availed on false grounds, the Company reserves the right to:

- Treat the leave as unpaid, and/or
- Take disciplinary action as per Company policy.

## **5. Data Protection and Privacy Policy**

In the construction industry, handling large volumes of personal data, from employee records to client information is inevitable. This policy outlines Giriraj Civil Developers Limited's framework to safeguard corporate data, protect intellectual property, and ensure employee data privacy in compliance with Indian laws.

### **Purpose and Scope**

This policy aims to:

- Define roles and responsibilities for data and IP protection
- Establish standards for handling, storing, and sharing corporate and employee data
- Set guidelines to safeguard the company's intellectual property rights (IPR)
- Comply with the Digital Personal Data Protection Act, 2023, Information Technology Act, 2000, and relevant IPR statutes in India

This Policy applies to all employees, contractors, consultants, and third-party vendors handling company or employee data.

### **Definitions:**

**“Personal Data”** means any information relating to an identified or identifiable individual (e.g., name, contact details, government ID numbers)

**“Sensitive Personal Data or Information (SPDI)”** means information requiring higher protection, including health records, financial data, and biometric identifiers under IT Act Section 43A and SPDI Rules.

**“Data Fiduciary”** means Giriraj Civil Developers Limited, determining the purpose and means of processing personal data.

**“Data Principal”** means the employee or individual whose personal data is processed

**“Classified Company Data”** means

- Restricted: trade secrets, financial forecasts, contract terms,
- Confidential: internal reports, project designs,
- Public: press releases, marketing brochures.

**“Intellectual Property Rights (IPR)”** means the rights granted under Indian laws (Copyright Act 1957, Patents Act 1970, Trademarks Act 1999) to protect creations, inventions, and branding

### **Governance & Roles**

**HR Head (Data Protection Officer)** - Oversees policy enforcement, handles data access requests, liaison with regulators

**Legal & IPR Team** - Manages registration and enforcement of copyrights, patents, trademarks

**IT Department** - Implements technical safeguards, encryption, access controls, vulnerability assessments

**Employees & Vendors** - Follow data handling rules, report incidents, complete mandatory trainings

### **Data Classification & Protection**

Classify data at creation based on sensitivity level.

**Apply controls:** Encryption for Restricted data, access logs for Confidential data, prohibit personal devices for processing Restricted data without IT approval

**Enforce secure disposal:** Shredding physical documents, secure wipe for digital files

### **Intellectual Property Rights (IPR) Protection**

- Register company trademarks, and copyrights with the Indian Patent Office and Trademark Registry
- Enforce non-disclosure agreements (NDAs) on all external vendors and partners
- Prohibit unauthorized copying or distribution of proprietary drawings, software, reports
- Monitor online and offline use of company branding; initiate takedown or legal action against infringements
- Maintain an IPR register tracking filings, expiries, and litigation

### **Employee Data Protection & Privacy**

#### **Legal Framework & Principles**

- Comply with Digital Personal Data Protection Act, 2023 for personal data processing
- Adhere to IT Act 2000 Section 43A and SPDI Rules for securing sensitive employee data
- Follow principles of lawfulness, transparency, purpose limitation, data minimization, accuracy, storage limitation, and security

#### **Employee Rights**

- Right to be informed about data collection and use
- Right to access and obtain copies of personal data held by the company
- Right to correction of inaccurate or incomplete data
- Right to data portability where applicable
- Right to withdraw consent for processing operations based on consent
- Right to erasure under conditions specified in DPDPA 2023

#### **Data Collection & Usage**

- Collect only data necessary for recruitment, payroll, performance management, and compliance
- Maintain records of consent when processing SPDI such as bank details, health records, or biometric data
- Limit internal access to employee data on a need-to-know basis, logged and reviewed quarterly

#### **Data Security Measures**

- Deploy firewalls, intrusion detection, endpoint protection, and network segmentation
- Encrypt SPDI at rest and in transit using industry-standard algorithms
- Enforce strong password policies, multi-factor authentication for remote access
- Conduct periodic vulnerability scans and penetration tests
- Maintain audited logs of data access and modification

### **Incident Response & Breach Management**

- Establish an Incident Response Team to detect, investigate, and contain breaches
- Notify affected employees and the Data Protection Board within DPDPA-mandated timelines
- Record all incidents in a breach register, perform root-cause analysis, and implement corrective Actions.

### **Compliance, Monitoring & Audit**

- Conduct annual compliance audits against this policy and applicable laws
- Report non-compliance incidents to senior management for review
- Integrate policy adherence into vendor due-diligence and contract management

### **Training & Awareness**

- Mandatory onboarding training on data protection, IP safeguards, and privacy rights
- Annual refresher programs and phishing simulations
- Regular updates via newsletters and intranet on emerging threats and legal changes

### **Policy Review**

Review this policy at least once every 12 months or upon significant changes to:

- Applicable laws or regulations
- Company processes, technologies, or risk landscape

Beyond this policy, Giriraj Civil Developers Limited may explore aligning with ISO 27001 for information security, implementing a privacy impact assessment (PIA) framework, and benchmarking against leading infrastructure firms to continuously enhance data and IPR governance.

## **6. Social media policies:**

The social media Policy offers comprehensive guidelines for employees regarding their use of social media platforms, whether for personal or professional purposes on behalf of the company. It underscores the importance of responsible utilization, maintaining productivity, and safeguarding the company's image and confidentiality.

Additionally, the policy outlines potential disciplinary actions for any violations. Key components of this policy include guidelines for using personal social media during work hours to ensure it doesn't impede productivity.

Moreover, it provides clear instructions for employees representing the company on social media platforms, emphasizing the values of respect, accuracy, and responsibility. Furthermore, disciplinary consequences for policy violations, including the possibility of termination, are clearly outlined within the policy.

### **Key Elements:**

#### **Using Personal Accounts:**

Giriraj Civil Developers Ltd requires all employees to be careful when posting on social media. While we cannot restrict what you post we ask that you post responsibly, respectfully and with clarity as to who you are representing, mindful that you are an employee and have committed to always adhere to all company policies.

We would also caution you to avoid posting something that might make your collaboration with your work colleagues more difficult (e.g.: harassment towards colleagues' beliefs)

Representing Giriraj Civil Developers Ltd:

Only an approved administrator can post on company accounts and only once the post has been approved by the General Manager.

The administrator is expected to act carefully and responsibly to protect our company's image and reputation. It is important to follow these guidelines when talking about Splice Construction Ltd., its employees, or clients whether it is through your personal account or the company account.

- Follow the terms and conditions on all social media sites.
- Avoid sharing intellectual property like trademarks and logos on personal accounts without approval.
- Do not include any personal information about employees.
- Do not post negative, discriminatory, defamatory, or inflammatory comments about Splice Construction Ltd., their clients, or employees.
- Avoid speaking on matters outside of your field of expertise.
- Ensure that only positive health, safety, and environmental site practices are shown in any media posts about Giriraj Civil Developers Limited
- Do not post pictures or other information that implies someone has engaged in illegal conduct.
- Do not post anything that could create a real or perceived conflict of interest.
- Correct or remove any misleading or false content as quick as possible.

Any information that references a client's brand, name, images, or information must be approved by the client prior to being shared. No sensitive, private, or confidential company information (i.e., internal results, unannounced updates, pricing information or company strategy) is to be shared via social media.

#### Disciplinary Consequences:

We will monitor all social media postings on Giriraj Civil Developers Limited's accounts.

We may have to take disciplinary action leading up to and including termination if employees do not follow this policy's guidelines. Examples of non-conformity with the employee social media policy include but are not limited to:

- Disregarding job responsibilities and deadlines to use social media at work.
- Disclosing confidential information through personal or corporate accounts.
- Directing offensive comments towards other members of the online community including clients and other employees.

## 7. **Remote work policy**

The Remote Work Policy sets forth clear guidelines for employees engaged in work outside the traditional office environment. It defines remote work arrangements, providing clarity on both permanent and temporary setups. Additionally, it offers comprehensive guidance to ensure the effectiveness of remote work, covering aspects such as workspace setup and communication practices.

The policy underscores the importance of compliance with company policies, emphasizing the adherence to established standards even in remote work settings. Furthermore, it details provisions regarding equipment provisions, compensation adjustments, and ensures alignment with other company policies for remote employees.

## 8. **Expense reimbursement policy**

The Employee Expense Policy provides a structured framework for reimbursing employees for work-related expenditures. It categorizes expenses into two main groups: those directly covered by the company and those eligible for reimbursement to employees.

Emphasizing the importance of thorough documentation and adherence to approval processes, the policy aims to streamline expense management. It also offers clear definitions of reimbursable and non-reimbursable expenses, ensuring clarity for employees.

Key components of this policy include defining work-related expenses and delineating between company-paid and reimbursable expenses. Additionally, it provides detailed guidelines on what qualifies as reimbursable expenses and outlines the necessary documentation.

Moreover, the policy establishes procedures for submitting reimbursement claims, including timelines and the approval process, to ensure transparency and efficiency in expense reimbursement.

## **9. Conflict of interest policy**

One of the policies that every organization should have is, also, the Conflict-of-Interest Company Policy. It is designed to mitigate situations where an employee's personal interests could potentially conflict with those of the company. It places a strong emphasis on fostering mutual trust and transparency within the organization.

By providing clear definitions and examples of potential conflicts of interest, the policy aims to raise awareness among employees. Additionally, it outlines procedures for reporting and resolving identified or suspected conflicts, ensuring prompt and appropriate action is taken to address any conflicts that arise.

Moreover, the policy specifies disciplinary consequences for employees who conceal conflicts of interest or fail to resolve them in a timely manner, underscoring the importance of compliance and accountability within the company.

## **10. Whistleblower policy**

The corporate whistleblower policy serves as a vital mechanism for employees to report any instances of unethical or illegal behaviour within the organization without fear of retaliation.

Its primary goal is to foster a culture of transparency and accountability within the company.

A well-crafted whistleblower policy is crucial for promoting ethical practices and ensuring the integrity of the organization. HR professionals can utilize this template to tailor a policy that aligns with the specific needs and values of their organization, providing employees with a safe and confidential reporting avenue.

By implementing such a policy, HR demonstrates the company's commitment to maintaining a safe and ethical workplace for all employees.

A whistle-blower policy for a construction organisation should include the following elements:

1. Protection from retaliation: The policy should clearly state that there will be no retaliation or adverse action taken against whistleblowers who report in good faith.
2. Confidentiality: The policy should ensure that the whistleblower's identity is kept confidential, except to those who are necessary to investigate the concern.
3. Investigation: The Policy should state how the concern will be investigated, including who will be responsible for the investigation and what steps will be taken.

## **11. Performance management policy**

Performance Management is a structured process aimed at enhancing a company's effectiveness through the improvement of its employees' performance. This policy delineates the organization's approach to managing employee performance, encompassing objective setting, performance reviews, feedback mechanisms, and development plans.

A comprehensive Performance Management Policy should include clear definitions of performance management and delineate the respective responsibilities of both employers and employees throughout the process.

It should also outline the procedures for setting objectives and conducting performance reviews, as well as the steps the organization will take to address any performance issues that may arise. Additionally, the policy should specify the potential consequences for unsatisfactory performance.

This Performance Management Policy template is provided as a foundational resource that can be customized to suit the specific needs and requirements of your company. It serves as a starting point for establishing comprehensive employment policies tailored to your organization's unique context.

## **12. Email use policy**

The Email Usage Policy serves as a guiding framework for employees utilizing corporate email addresses, establishing clear guidelines regarding their appropriate and inappropriate usage. It underscores the importance of adhering to security measures and maintaining professionalism in all email communications.

Additionally, the policy addresses limitations on personal use, outlines specifications for email signatures, and delineates potential disciplinary actions for violations.

A comprehensive corporate email usage policy should include distinct criteria distinguishing appropriate from inappropriate email use, encompassing security measures such as password requirements and strategies for identifying phishing attempts. Moreover, it should provide guidance on crafting professional email signatures and specify the consequences of policy breaches.

## **13. Harassment and discrimination policy**

Giriraj Civil Developers Limited is committed to ensuring the working environment is free from harassment, Discrimination, Bullying and workplace Violence.

The Anti-Discrimination Policy is paramount in establishing a safe and inclusive workplace environment, aiming to prevent discrimination based on protected characteristics.

Organisation considers all type of harassment, discrimination, bullying and workplace violence to be unacceptable forms of behaviour that will not be tolerated under any circumstances. We believe all employees should be treated with respect, fairly and reasonably. Harassment, discrimination, bullying and workplace violence are illegal under a range of Federal and state legislation

This policy should incorporate comprehensive definitions of discrimination along with a delineation of protected characteristics, encompassing factors like age, gender, ethnicity, and sexual orientation.

Giriraj Civil Developers Ltd is therefore committed to ensuring that:

1. Harassment, discrimination, bullying and workplace violence complaints are treated seriously.
2. Complaints are attended to promptly and confidentially.
3. Complaints are investigated impartially.
4. Action is taken to ensure that misconduct does not continue and
5. Complainants and witnesses are not victimised in any way.

## **14. Recruitment and selection policy**

The hiring process of Giriraj Civil Construction Limited varies, but it typically follows a similar process, from creating a job title to interviewing, conducting checks, and accepting potential candidates to become long-term employees.

The Employee Recruitment and Selection Policy serve as a comprehensive guide to the procedures involved in attracting and selecting external job candidates. The policy offers detailed guidelines for various aspects of recruitment and selection, including job postings, selection stages, feedback mechanisms, and potential offer revocations.

Key components to include in this Employee Recruitment and Selection Policy involve providing an overview of the recruitment and selection process, from identifying the need for an opening to extending an official job offer.

Additionally, it should outline specific guidelines for job postings, covering internal postings, creation of job descriptions, and ensuring clarity and consistency in job advertisements.

Furthermore, the policy should detail the standard selection stages, such as resume screening, phone screening, and interviews, while also allowing flexibility to adapt or modify stages as necessary to meet the organization's needs and objectives.

### **Payroll:**

Employees pay cycle will be monthly. Salary will be automatically deposited electronically into the bank account details provided to Giriraj Group. Taxation payment will be automatically deducted from the salary.

## **15. Policy on prevention of sexual harassment (posh) act 2013:**

### **1. Purpose**

The Company is committed to providing a workplace free from sexual harassment and ensuring a safe, respectful, and dignified working environment for all employees. This Policy is framed in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** ("POSH Act") and the rules made thereunder.

### **2. Scope & Applicability**

This Policy applies to:

- All employees (permanent, temporary, probationers)
- Contract workers, consultants, vendors
- Interns, trainees, apprentices
- Visitors, clients, and customers
- All workplaces of the Company including:
  - Office premises
  - Client locations
  - Work-from-home
  - Company events, offsites, and travel

### **3. Definition**

#### **A. Aggrieved Woman**

As per **Section 2(a)** of the POSH Act, any woman who alleges sexual harassment at the workplace, irrespective of employment status.

#### **B. Sexual Harassment (Section 2(n))**

Includes any unwelcome:

- Physical contact or advances
- Demand or request for sexual favours

- Sexually coloured remarks
- Showing pornography
- Any verbal, non-verbal, or physical conduct of sexual nature

#### **C. Workplace (Section 2(o))**

Includes all places visited during the course of employment, including virtual/online platforms

### **4. Prohibition of Sexual Harassment**

Sexual harassment at the workplace is strictly prohibited and will be treated as **misconduct**, attracting disciplinary action under Company rules and applicable law.

### **5. Internal Committee (IC)**

#### **A. Constitution:**

In compliance with **Section 4** of the POSH Act, the Company has constituted an **Internal Committee (IC)**.

#### **Composition:**

- Presiding Officer (senior woman employee)
- Minimum two employee members
- One external member (NGO/legal/social worker)
- At least **50% women members**

#### **B. Tenure**

Members shall hold office for a period of **three (3) years**.

### **6. Complaint Procedure**

#### **A. Filing a Complaint (Section 9)**

- Complaint must be made in **writing**
- Within **3 months** from the date of incident
- Extension of another **3 months** may be granted by the IC
- Assistance will be provided if the complainant cannot write

#### **B. Conciliation (Section 10)**

- May be initiated **only at the request of the complainant**
- Monetary settlement is **not permitted**

### **7. Inquiry Process**

#### **A. Inquiry (Section 11)**

- Inquiry conducted in a fair and confidential manner
- Both parties will be given opportunity to be heard
- Inquiry completed within **90 days**

#### **B. Inquiry Report (Section 13)**

- IC submits findings to the employer

- Employer shall act on recommendations within **60 days**

#### **8. Interim Relief (Section 12)**

During pendency of inquiry, IC may recommend:

- Transfer of complainant or respondent
- Grant of leave up to **3 months**
- Any other relief deemed appropriate

#### **9. False or Malicious Complaints (Section 14)**

- Action may be taken if complaint is proven malicious
- Mere inability to substantiate a complaint does **not** attract action

#### **10. Confidentiality (Section 16)**

Strict confidentiality shall be maintained regarding:

- Identity of parties
- Details of complaint
- Inquiry proceedings and outcomes

Violation of confidentiality is punishable under law.

#### **11. Disciplinary Action**

If sexual harassment is proven, actions may include:

- Written warning
- Suspension
- Termination of employment
- Deduction of compensation from salary
- Legal action under applicable laws

#### **12. Employer's Responsibilities (Section 19)**

The Company shall:

- Provide a safe working environment
- Display POSH notices
- Conduct periodic awareness training
- Assist IC in discharge of its duties
- Submit annual POSH report to authorities

#### **13. Annual Report (Section 21)**

The IC shall submit an annual report including:

- Number of complaints received
- Complaints resolved
- Pending cases (if any)

#### **14. Penalty for Non-Compliance (Section 26)**

Non-compliance may result in:

- Fine up to ₹50,000
- Cancellation of business license on repeat offence

#### **15. Policy Review & Amendment**

The Company reserves the right to amend this policy in accordance with changes in law or organizational requirements.

#### **16. Travel policy**

The company travel policy serves as a comprehensive guide for business-related travel, detailing reimbursable expenses and guidelines for employees. It encompasses various aspects such as transportation, accommodation, legal/medical expenses, and daily allowances.

Employees are encouraged to exercise discretion and ensure timely submission of expenses for reimbursement. Key components to include in the policy are guidelines on transportation methods and their reimbursement, provisions for accommodation including specified hotel standards, and instructions for managing meal expenses and client meetings during trips. Personal travel allowance will not be reimbursed.

#### **17. Drug and alcohol policy**

The drug and alcohol policy establishes guidelines for the acceptable use and misuse of drugs and alcohol in the workplace, aiming to maintain a safe and productive work environment. It sets clear boundaries regarding the consumption and possession of these substances while also providing support mechanisms for employees facing substance misuse issues.

#### **18. Intellectual property policy**

An Intellectual Property (IP) Policy is a framework that governs the creation, protection, and use of intellectual property assets within an organization. It outlines the rights and responsibilities of employees regarding the development, ownership, and utilization of intellectual property, including inventions, patents, trademarks, copyrights, and trade secrets.

The policy serves to safeguard the organization's intellectual assets, promote innovation, and ensure compliance with legal requirements and ethical standards.

Key components that should be included in an Intellectual Property Policy typically encompass provisions for defining the types of intellectual property covered, establishing procedures for disclosing and protecting intellectual property, outlining ownership rights and assignment agreements, specifying confidentiality and non-disclosure obligations, and addressing issues related to licensing, infringement, and enforcement.

#### **19. Grievance handling policy**

A Grievance Procedure Policy outlines the process by which employees can express their complaints or grievances in a constructive manner. The policy emphasizes the importance of supervisors and senior management being aware of issues that affect employees' work and promptly addressing them to prevent conflicts.

Additionally, it promotes open communication and encourages employees to voice their grievances to foster a supportive and pleasant workplace environment.

- **How to raise a grievance**

Employees should raise grievances with their direct supervisor or HR department in writing, using a grievance form. It should provide a clear explanation and relevant facts or evidence. Grievances should be filed within a specific timeframe.

- **Who handles grievances**

Different people may be responsible for handling grievances from different sources:

- **HR manager:** Handles internal complaints from employees
- **CR manager:** Handles complaints from communities, social stakeholders, and other stakeholders
- **OG manager:** Handles complaints from raw material suppliers
- **HSE manager:** Handles complaints from environmental NGOs
- **MD/DG/COO/Chef de site:** Handles complaints from authorities or para-public organizations
- **Marketing:** Handles complaints from sub-contractors

- **How to resolve grievances:**

All concerned parties should make every effort to resolve issues at the earliest stage. A written record should be kept of meetings and decisions.

## 20. **Contractors**

The Company wishes to ensure that as far as is reasonably practicable, the Health, Safety and Welfare of Contractors working in the Company's establishments will be of the highest standards. In addition, Contractors and their employees have an obligation so far as is reasonably practicable to ensure all equipment, materials and premises under their control are safe and without risks to health.

Contractors must also observe the Company's Fire Safety Procedures. These obligations will be drawn to the attention of the Contractors in the contract document issued to them. In addition, a Company Manager will be identified in the contract as having authority to stop the work of Contractors who are placing themselves, other staff, or visitors at risk. Any member of staff who judges there is a risk where contractors are working, should inform their manager immediately.

In tendering, Contractors will be asked to confirm they have a written Health, Safety and Welfare Policy. The Company's Manager letting the Contract will be responsible for monitoring the Health and Safety performance of the Contractor and the Contractor's performance will be a factor in deciding whether or not to invite the Contractor to tender again.

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