



Anti-Harassment Policy

The Company is committed to providing a work environment that promotes and advances productive working relations and mutual respect among employees.

It is the policy of the Company to provide an environment free from all forms of harassment. Employees have a duty to act in accordance with this policy, and therefore to treat fellow colleagues with dignity at all times, and not to discriminate against or harass other employees.

The Company resolves to prevent or deter the commission of acts of harassment and to provide the procedures for the resolution, settlement, or prosecution of acts, in instance of harassment by taking all required steps.

1. Objectives

The objectives of the Company's Anti-Harassment Policy are to:

- Eliminate acts of harassment, either sexual or otherwise and provide appropriate procedures to deal with the problem in case of such occurrence
- Encourage and promote the creation of workplaces free of harassment, in which employers and employees respect their privacy and right to equality within and outside of the Company
- Deal with it in a sensitive, prompt, unbiased and confidential manner
- Ensure that neither the aggrieved nor the alleged party are victimized in any way by management

2. Features

- Definition of Harassment
- Redress Mechanism
- Committees Formation for Harassment Cases

3. Definition

3.1. Harassment includes verbal, physical, sexual and visual conduct that creates an intimidating, offensive, or hostile working environment that interferes with work performance. Such conduct constitutes harassment when:

- 3.1.1.** Submission to the conduct is made either an explicit or implicit condition of employment
- 3.1.2.** Submission to or rejection of the conduct is used as the basis for an employment decision
- 3.1.3.** The harassment interferes with the employee's work performance or creates an intimidating, hostile or offensive work environment

3.2. Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as:

3.2.1. Physical contact and advances

3.2.2. A demand or request for sexual favors

3.2.3. Sexually colored remarks

3.2.4. Showing pornography

3.2.5. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

4. Redress Mechanism

4.1. Complaints of harassment or other threatening behavior in any form will be confidential and only employees necessary for the investigation and resolution of the complaint will be given information about it.

4.2. A complaint of sexual harassment in the workplace will be treated with utmost confidentiality.

4.3. Anonymous disclosure will not be entertained.

4.4. If an employee feels victimized, he or she can report it directly by mail to any of the following; Head- HR, Business Unit Head, any Management committee member, Head Legal Counsel or the MD & CEO regarding the grievance.

4.5. The mail must state the following:

4.5.1. Nature of the offence b. Occurrence of events

4.5.2. Full details of complainant and the accused party

4.6. There will be two committees to handle complaints on Sexual Harassment and any other form of harassment respectively.

4.7. The Committee for addressing complaints on Sexual Harassment will include:

4.7.1. A female Management Committee Member (heading the Committee)

4.7.2. The Head-HR

4.7.3. Two Business Heads from non-related verticals

4.7.4. Half of the Committee's members will be females

5. Process

5.1. The Committee will initiate investigations within 10 working days from the date of the receipt of the complaint to discuss the issue.

5.2. Either party may be asked to attend the meetings. Based on the discussion & the investigations, a decision will be arrived at.

- 5.3. The action taken will be notified to the complainant within five working days from the date of the final meeting.
- 5.4. If either party is not satisfied with the verdict, they can appeal to the Managing Director who will then discuss the issue with the committee again and arrive at the verdict.
- 5.5. The decision taken by the Managing Director will be final and binding on both the parties.
- 5.6. The Company will ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- 5.7. The victims of sexual harassment will have the option to seek transfer of the perpetrator or their own transfer. They can discuss the same with the Committee and the Head – HR.
- 5.8. Care will be taken that complete confidentiality is maintained about the matter to prevent the complainant's discomfort at the work place.
- 5.9. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.
- 5.10. These may be in form of:
 - 5.10.1. Granting leave to the affected person
 - 5.10.2. Providing an option of transfer to the affected person to a related the Company business or within the same department (subject to availability)

6. Confidentiality of Complaints

Harassment complaints will be kept confidential, except as required to complete the investigation and review process, or unless the Company is required to disclose it in a legal action. To maintain confidentiality, it is important that the employees should not also confer with anyone else within the Company about the situation.

7. Disciplinary Action

- 7.1. Where the harassment amounts to misconduct, the Company shall in accordance with the Company policies or rules initiate appropriate disciplinary action.
- 7.2. Harassment is a disciplinary offence, and is capable of amounting to gross misconduct and can lead to suspension.

8. Non-Retaliation

Discrimination or harassment for any reason will not be tolerated. No retaliation or intimidation

directed towards anyone who makes, assists in making a complaint or is a witness in an investigation, will be tolerated.

The law and our values protect any person who, in good faith, reports what he or she thinks is discrimination or harassment from experiencing retaliation because he or she has exercised his or her legal rights.

9. Policy Scope

This policy will be applicable to all Company employees including employees deputed at client sites, vendors, outsourced business associates, or any person engaged in the Company's business, etc.

10. Dispensation

Dispensation requires approval of the CXO, Management, or the Board of Directors.

11. Policy Approver

The Board of Directors and / or the Management of the Company

12. Policy Owner/Administrator

Human Resource Department

Sd/

Neeraj Sanghi
Chief Executive Officer
Highway Concessions One Pvt. Ltd.