

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

1. Scope and Applicability:

This policy is applicable to all resources of Noveltech Feeds Private Limited, its subsidiaries and affiliates (including the group's manufacturing units, collectively, “**Noveltech**” or “**Company**”), which for the purpose of this policy shall include all officers, directors, permanent and temporary employees, probationers, trainees, consultants, secondees, contract workers, visitors, all kinds of staff and interns working at Noveltech's offices (collectively, “**Resources**” or individually, “**Resource**”) .

This policy is applicable to all premises of Noveltech and any place visited by the Resources arising out of or during the course of their association/employment with the Company including transportation provided by the employer for undertaking such journey (e.g., in vehicles, third party premises, offsite meetings and events, virtual or physical meetings and public venues). Noveltech will not tolerate any form of sexual harassment, if engaged in by its Resources, or by any other individual, if such conduct occurs on Noveltech's premises or during the course of the Resource's work for Noveltech.

2. Objective:

Noveltech is committed to providing a safe and healthy work environment and does not permit any form of sexual harassment in its workplace. Noveltech and everyone working with it, have a shared responsibility in contributing to a respectful work environment. In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (**Act**), Noveltech has provided a framework to specifically deal with acts of sexual harassment at workplace. While the Act is only intended to protect women, Noveltech is committed to providing a workplace free of sexual harassment. Accordingly, this policy is intended to be gender neutral and will apply in case of sexual harassment of any person, irrespective of the gender of the parties.

3. What constitutes Sexual Harassment:

Sexual harassment includes any one or more of the following acts or behavior (whether directly or by implication):

- (a) Physical contact or advances;
- (b) A demand or request for sexual favors;

- (c) Sexually coloured remarks;
- (d) Showing pornography; or
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Examples of sexual harassment include but are not limited to:

Verbal: Repeated requests for dates, sexual innuendoes, sexual epithets, derogatory, slurs, foul or obscene language, inappropriate jokes/propositions, questions about another's sexual experiences, or sexually suggestive or insulting remarks or sounds;

Visual/Non-verbal: Inappropriate written materials (including email and online content), derogatory posters, cartoons or drawings, suggestive objects or pictures, graphic commentaries, leering, or obscene gestures; and

Physical: Assault of a sexual nature, such as rape, molestation or attempts to commit these assaults. Any other physical conduct that is sexual in nature, such as touching, pinching, patting, grabbing, brushing against another's body, etc.

Additionally, if any of the following circumstances exist in relation to or connected with any act or behavior of sexual harassment (as set out above), such conduct would also amount to sexual harassment at the workplace:

- (a) implied or explicit promise of preferential treatment at work;
- (b) implied or explicit threat of detrimental treatment at work;
- (c) implied or explicit threat about present or future employment/engagement status;
- (d) interference with work or creating intimidating, offensive or hostile working environment; or
- (e) humiliating treatment likely to affect a Resource's health or safety.

4. The Internal Complaints Committee:

Noveltech has constituted an internal complaints committee (**Internal Committee**). Role of the Internal Committee is to deal with the complaints of sexual harassment received by it and provide relief to the Resource who has been subject to sexual harassment (**Complainant**). The names and

contact details of the members of the Internal Committee is set out in **Annexure 1** attached herewith. The Company shall have the right and absolute discretion to remove or replace any member of the Internal Committee, if it deems necessary or appropriate.

5. Reporting a Complaint:

Complainant must make a written complaint (via email at the email IDs set out in **Annexure 1** or a physical hard copy) to the Chairperson or to any member of the Internal Committee at the earliest and in any case within three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. The Internal Committee may, for the reasons to be recorded in writing, extend the time limit, not exceeding three months, if it is satisfied that the circumstances were such which prevented the Resource from filing a complaint within the initial three months period.

If a Complainant is unable to make the complaint, a relative, friend, co-worker or another third party (referred to as authorized person) may make the complaint on behalf of the Complainant. The Complainant may also seek the help of any member of the Internal Committee or the concerned HR representative, for making the complaint in writing.

Once a complaint is received, the Internal Committee will initiate an inquiry in accordance with applicable law. During the pendency of the inquiry, the Internal Committee may, at its discretion, recommend any interim measures as it deems necessary (including a recommendation that the accused be placed on suspension).

6. Procedure for dealing with complaints of sexual harassment:

6.1 Processing the Complaint

- (a) The Internal Committee will hold a meeting with the Complainant, within [7] working days of the receipt of the complaint or within such time period as it may deem reasonable. At this meeting, the Internal Committee shall hear the Complainant and record his/her allegations along with details of any witness and evidence.
- (b) The Internal Committee shall then forward a copy of complaint to the person against whom the complaint has been filed (**Respondent**), within [7] working days of the initial meeting with the Complainant, or within such time period as it may deem reasonable and give him/her an opportunity to submit a written explanation if he/she so desires.
- (c) The Respondent shall file his/her reply to the complaint along with his/her list of documents and names and addresses of witnesses within a period of [7] working days from the date of receipt

of the complaint from the Internal Committee or such other period that the Internal Committee may specify.

6.2 Further action on the Complaint

(a) Conciliation

- i. The Internal Committee may, before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.
- ii. Where a settlement has been arrived at under sub-clause (i) of this clause (a), the Internal Committee shall record the settlement so arrived at and forward the same to the [head of Human Resources] of the Company's concerned office to take action as specified in the recommendation.
- iii. Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.

(b) Inquiry into the Complaint

Where the Complainant informs the Internal Committee that any term or condition of the settlement arrived at as part of the conciliatory proceedings has not been complied with by the Respondent, or if the Complainant does not request for conciliation, or if the conciliation process fails, and where the Respondent is a Resource, the Internal Committee would proceed to make an inquiry into the complaint in accordance with the provisions of this Policy.

- i. Quorum for the inquiry proceedings shall be a minimum of three members of the Internal Committee including the Presiding Officer.
- ii. Both the Respondent and the complainant (unless specifically exempted by the Internal Committee in writing) shall be required to attend every hearing that they are called for. If either party fails to attend [2] consecutive hearings without sufficient cause, the Internal Committee may terminate the inquiry or pass an *ex parte* order within [7] days' notice.
- iii. While conducting the inquiry, the Internal Committee shall call upon such witnesses as it may deem appropriate and provide a reasonable opportunity of being heard to both the Complainant and the Respondent.

(c) Inquiry report

- i. On completion of an inquiry, the Internal Committee will prepare a report of its findings and recommendation for action to be taken by Noveltech.
- ii. Inquiry report shall be provided to the Chairperson of the Internal Committee within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

6.3 Interim relief:

During the pendency of the inquiry, on a written request being made by the Complainant, the Internal Committee may recommend (a) transfer the Complainant to another department/division/team as deemed appropriate, or (b) transfer the Respondent to another department/division/team as deemed appropriate, or (c) grant leave to the Complainant up to a period of [3] months, or (d) restrain the Respondent from reporting on the work performance of the Complainant or writing the Complainant's appraisal/confidential report(s). The Internal Committee may also recommend suspending the Respondent during the pendency of the inquiry if the circumstances so merit. Additionally, the Company shall act upon the recommendation within sixty days of its receipt.

7. Disciplinary Action:

In the event a Resource is found to be guilty of sexual harassment, or of filing a false and malicious complaint, or giving false evidence during the inquiry, he/she will be subject to disciplinary action as recommended by the Internal Committee. Such disciplinary action may include, training/counselling, written or verbal warning, withholding increment, bonus/additional performance-based retainer payment or promotion, suspension of services without pay, termination of the services with Noveltech or such other action as the Internal Committee may deem appropriate.

8. Third Party Harassment:

If any Resource has been subject to sexual harassment during the course of work for Noveltech by any third party, including visitors, etc., Noveltech will take appropriate remedial measures, including, assisting the Resource to raise a complaint with the accused's employer.

9. Resources' Responsibilities:

- (a) All Resources must read and abide by this Policy, attend trainings (as and when required) and speak to the Human Resources (**HR**) Department or the Internal Committee, when they have

questions.

(b) Everyone is responsible for reporting concerns about sexual harassment in a timely fashion. Any Resource who becomes aware of possible sexual harassment of another person must encourage the harassed party to inform the Internal Committee. The Resource may also contact the HR Department of the relevant location or its reporting senior to raise concerns. They will forward this information to the concerned HR Department. Please note that a formal complaint and the related process will commence only when the complaint is filed with the Internal Committee by the aggrieved person, or the aggrieved person has provided his/her consent to initiate a formal investigation.

(c) Noveltech respects the privacy of all Resources. Accordingly, complaints of sexual harassment and any resolution of the same will be handled with complete sensitivity, in a timely manner and kept confidential to the extent possible. Violations of confidentiality can result in disciplinary action, up to and including termination.

(d) Noveltech also prohibits retaliation against anyone for making a good faith report regarding sexual harassment, assisting in making a sexual harassment complaint, or cooperating in a sexual harassment inquiry. Anyone found guilty of retaliatory behavior will be subject to disciplinary action, up to and including termination.

**NOVELTECH FEEDS PRIVATE LIMITED**

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ANNEXURE 1**INTERNAL COMMITTEE MEMBERS**

Name	Role	Email ID
Amtul Baseer Quadri	Chairperson	amtulbaseerquadri@noveltech.in
Sandhya Shetty	Member	sandhyashetty@noveltech.in
Raghavendra Joshi	Member	raghavendra.joshi@noveltech.in
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**To be finalized shortly*

