

PREVENTION OF SEXUAL HARRASSMENT AT WORKPLACE

1 PREVENTION OF SEXUAL HARASSMENT

1.1 INTRODUCTION

Navig8 India Private Limited and Integr8 Fuels India Pvt Ltd (both the “**Company**”) are committed to providing a safe and healthy work environment to all employees and do not permit any form of sexual harassment at the workplace. The Company and its employees have a shared responsibility in contributing to a mature and respectful work environment. In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (**Act**), the Company has provided a framework to specifically deal with acts of sexual harassment at the workplace. This policy is intended to be gender neutral and will apply uniformly in case of sexual harassment of any person, irrespective of the gender of the parties. This policy will supersede any previous policies on the subject matter.

1.2 SCOPE

This policy is applicable to all 'employees' of the Company, which term for the purpose of this policy shall include all permanent and temporary employees, probationers, trainees, apprentices and also contract workers or vendors/service providers/consultants working on the Company's premises. In the case of an allegation of sexual harassment made against a contract worker, the Company will work with the direct employer of the alleged offender to decide how the matter should be dealt with.

This policy is applicable not only on the Company's premises, but also in instances where individuals covered by this policy have an occasion to interact on a work-related basis (e.g. in vehicles, third party premises, off site meetings and public venues). The Company will not tolerate any form of sexual harassment, if engaged in by its employees, clients or suppliers or any other business associates, if such conduct occurs on the Company's premises or during the course of the employee's work for the Company.

The policy applies to any allegations of sexual harassment made by an employee, client or visitor against an employee, if the conduct occurred on the premises of the Company, or during the course of the employee's work for the Company.

1.3 SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature (whether directly or by implication).

Sexual harassment at the workplace includes:

1. physical contact and advances; or
2. a demand or request for sexual favours; or
3. making sexually coloured remarks; or
4. showing pornography; or
5. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

This may also include sharing written material with sexual content, obscene gestures or wolf whistling, intimate comments on a person's appearance, sexually explicit conversation etc.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

1. Implied or explicit promise of preferential treatment in employment; or
2. Implied or explicit threat of detrimental treatment in employment; or
3. Implied or explicit threat about present or future employment status; or
4. Interference with work or creating intimidating or offensive or hostile working environment;
or
5. Humiliating treatment likely to affect health or safety.

It is unlawful for males to sexually harass females or other males, and for females to sexually harass males or other females. Sexual harassment in the workplace is prohibited whether it involves co-worker harassment, harassment by a manager, applicants for employment, temporary agency personnel and contractors, customers or vendors, or harassment by or of persons doing business with or for the Company.

1.4 PROCESS OF DEALING WITH SEXUAL HARASSMENT COMPLAINTS

Complaint Procedure for Sexual Harassment

1.4.1 Internal Committee

The Company has constituted a committee for redressal of sexual harassment complaints and for ensuring time bound treatment of such complaints (**Internal Committee**).

The names and contact details of the members of the Internal Committee is set out in Annexure B. The Company shall have the right and absolute discretion to remove or replace any member of the Internal Committee, if the Company believes this is necessary or appropriate.

The Internal Committee is responsible for investigating every formal written complaint of sexual harassment and making recommendations to the Company on the actions to be taken against the respondent.

1.4.2 Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

1.4.2.1 Complaints

Any individual who is a victim of sexual harassment at the workplace, may make a formal complaint by writing an email to their employing entity's Internal Committee:

- Navig8: N8POSH@navig8group.com
- Integr8: I8POSH@integr8fuels.com

Any email sent to either of the addresses above will be accessible to all members of the relevant entities' Internal Committee.

You may also contact the Presiding Officer or any member of the Internal Committee individually (contact details set out in Annexure B). In certain special circumstances, where the victim is unable to make the complaint, the Internal Committee may allow an authorized person to make the complaint in accordance with applicable law. The complaint must be in writing and can be in the form of a letter or an email. The complainant is required to disclose her/his name and contact details, and where the

complainant is an employee, the department and division the employee is working in, to enable the Internal Committee to contact the complainant and take the matter forward. The supporting documents and the names and address of witnesses must also be submitted along with the complaint.

- a) The complaint should be made within 3 months from the date of occurrence of the alleged incident and in case of series of incidents, within a period of 3 months from the date of the last incident. The Internal Committee may, at its sole discretion, extend this time limit by up to 3 more months if it is satisfied that the circumstances were such which prevented the complainant from filing of the complaint within the period of 3 months.

1.4.2.2 Processing the Complaint

- a) The Internal Committee will normally hold a meeting with the complainant, as soon as practicable, but not later than a week in any case. At this meeting, the Internal Committee shall hear the complainant, record her/his allegations and encourage her/him to submit any corroborative material with a documentary proof, oral or written material etc. to substantiate the complaint.
- b) The Internal Committee shall normally forward a copy of complaint to the respondent, within seven working days from the initial meeting, or within such time-period as it may deem reasonable and give her/him an opportunity to submit a written explanation if she/he so desires.
- c) The respondent shall file her/his reply to the complaint along with her/his list of documents and names and address of witnesses within a period of ten working days from the date of receipt of the complaint from the Internal Committee or such other period that the Internal Committee may specify.
- d) In the event the Internal Committee concludes that prima facie the complaint does not fall within the purview of Sexual Harassment, the Internal Committee will forward the complaint to the relevant adjudicating body that can look into the complaint.

1.4.2.3 Further action on the complaint

- a) Conciliation
 - (i) The Internal Committee may, before initiating an inquiry and at the request of the victim, take steps to settle the matter between the victim 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 Company to implement the terms of the settlement where required.
 - (iii) Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.
- b) Inquiry into the Complaint
 - (i) Where the victim 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 victim does not request for conciliation, or if the conciliation process fails, and where the respondent is an employee, the Internal Committee would proceed to make an inquiry into the complaint in accordance with the provisions of this policy.

- (ii) Quorum for the inquiry proceedings shall be 3 members of the Internal Committee including the Presiding Officer.
- (iii) Both the respondent and the complainant (unless specifically exempted by the Internal Committee in writing) shall be required to attend every hearing that they have been called for. If either party fails to attend three consecutive hearings without sufficient cause, the Internal Committee may terminate the inquiry or pass an ex parte order with fifteen days' notice.
- (iv) 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.
- (v) On completion of the inquiry, the Internal Committee will prepare a report of its findings and recommendation for action to be taken by the Company and submit the same to Mr. Sanjeev Bhatnagar, the Director of the Company and in case he ceases to be the Director of the Company, the successor to his position in the Company.

1.4.2.4 Interim relief

During the pendency of the inquiry, on a written request being made by the victim, the Internal Committee may recommend to the Company to: (a) transfer the victim to another office/department/division as deemed appropriate, or (b) transfer the respondent to another office/department/division as deemed appropriate, or (c) grant leave to the victim up to a period of three months, or (d) restrain the respondent from reporting on the work performance of the victim or writing the victim's appraisal/ confidential report(s). The Internal Committee may also recommend to the Company to suspend the respondent with full pay during the pendency of the inquiry if the circumstances so merit.

1.4.2.5 Internal Committee's Recommendation and Action by the Company

- a) In the event the respondent is found guilty of sexual harassment, depending upon the gravity of the offence and without prejudice to any legal right(s), the Internal Committee may make any of the following recommendations of disciplinary action to be taken against the respondent:
 - (i) Direct the respondent to undergo training or counselling to address any specific issues.
 - (ii) Transfer the respondent.
 - (iii) Give a verbal or written warning which will also be noted in the respondent's record.
 - (iv) Withhold increment or bonus (whether in full or part).
 - (v) Withhold promotion.
 - (vi) Direct termination of employment of the respondent.
 - (vii) Any other recommendations as it may deem fit.
- b) In the event the Internal Committee concludes that the respondent is not guilty, the Company shall not take any further action.
- c) If the victim desires to take criminal action against the respondent, there shall be no objection by the Internal Committee and the Company. In such an event, the Company will attempt to provide all reasonable assistance to the victim. The Company may also choose to initiate criminal proceedings against the respondent.

1.4.2.6 Punishment for false or malicious complaint and false evidence

Where the Internal Committee arrives at a conclusion that the allegation against the respondent is malicious or the complainant has made the complaint knowing it to be false or the complainant has produced any forged or misleading document, it may recommend to the Company to take action against the complainant. The Internal Committee may also recommend to the Company to take appropriate disciplinary action, when it arrives at a conclusion that any witness has given false evidence or produced any forged or misleading document. These recommendations to be made by the Internal Committee will be similar to the recommendations of disciplinary action to be taken against the respondent if she/he is found guilty of sexual harassment, as discussed in clause (a) of the above sub-section 12.4.2.5.

1.4.3 Confidentiality

The Company understands that it is difficult for the victim/complainant to come forward with a complaint of sexual harassment and recognizes the victim/complainant's interest in keeping the matter confidential.

To protect the interests of the victim/complainant, the respondent, witnesses and others who may assist with the inquiry into a complaint of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances. The Internal Committee, the Company, the victim/complainant, the respondent and the witnesses shall be bound to keep information relating to the inquiry process confidential.

The victim/complainant, respondent, witnesses and members of the Internal Committee who are employees of the Company who breach the confidentiality of the inquiry process would be liable for disciplinary action up to and including termination.

1.4.4 Protection against Retaliation

The Company prohibits any form of retaliation against anyone who has raised a complaint of sexual harassment or has cooperated in any inquiry involving a complaint of sexual harassment.

Any individual who believes that she/he is experiencing retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report this to the Internal Committee or HR, and the Company will then address the concerns raised. Any person who is found to be guilty of retaliation may be subject to appropriate disciplinary action including dismissal from service. Anyone who abuses this procedure (for example, by maliciously putting an allegation knowing it to be untrue) would also be subject to disciplinary action including dismissal from service.

1.5 ACCESS TO REPORTS AND DOCUMENTS

All records of sexual harassment complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company, except where disclosure is required under disciplinary or other remedial processes.

2 ANNEXURE B: INTERNAL COMMITTEE MEMBERS AND EMAIL CONTACTS

Please note that the 'Presiding Officer' and 'External Member' are members of **both** the Integr8 and the Navig8 Internal Committees.

The members of the [Navig8](#) Internal Committee at the Company are:

Emp ID	Name of the committee members	Role	Email ID
PW828	Aafrin Khan	Presiding Officer	aafrin.k@navig8group.com
PW719	Kunal Kishore	Employee Member	kunal.k@navig8group.com
PW1093	Mansi Kadam	Employee Member	Mansi.k@navig8group.com
N/A	Dr. Devika Singh	External Member	devika.singh@cohereconsultants.com

Navig8 Committee email ID: N8POSH@navig8group.com

The members of the [Integr8](#) Internal Committee at the Company are:

Emp ID	Name of the committee members	Role	Email ID
PW828	Aafrin Khan	Presiding Officer	aafrin.k@navig8group.com
PW853	Ajay Bobade	Employee Member	Ajay.B@integr8fuels.com
PW642	Vaishali Pant	Employee Member	vaishali.p@integr8fuels.com
N/A	Dr. Devika Singh	External Member	devika.singh@cohereconsultants.com

Integr8 Committee email ID: I8POSH@navig8group.com