

HUMAN RESOURCE POLICY

DATE ISSUED : December 01,2024

SUBJECT : Prohibition, Prevention & Redressal of Sexual Harassment

1. **PREAMBLE**

NUSUMMIT TECHNOLOGIES PRIVATE LIMITED ("the Company" formerly known as CXIO Technologies Private Limited) reaffirms its commitment to treat all individuals with dignity and respect. As a logical extension of this commitment, the Company has established this Policy with the objective of creating and maintaining a work environment that is free from sexual harassment.

2. **APPLICABILITY OF THIS POLICY**

The Company will apply this Policy to all conduct/situations affecting its work environment. Examples of such situations are:

- (a) Interactions amongst the Company's employees*, irrespective of location and timing;
- (b) Interactions between the Company's employee and a third party during the course of employment or third party's business relationship with the Company;
- (c) Interactions between an employee of the Company/third party having a business relationship with the Company and a visitor to the Company's premises/events.

** The term "employee" includes permanent as well as temporary employees, individual consultants and trainees (paid as well as unpaid).*

3. **PROHIBITION OF SEXUAL HARASSMENT**

(A) The Company strictly prohibits Sexual Harassment and will continuously strive to create a work environment that is free from Sexual Harassment.

(B) The Company will treat any conduct that is unwelcome and sexual in nature, as Sexual Harassment.

Examples of such conduct are:

- (a) physical contact and advances;
- (b) a demand or request for sexual favors;
- (c) making sexually colored remarks;
- (d) Showing pornography.

(C) The Company will also treat any conduct/circumstance that is harassing in nature and occurs in relation to or connected with unwelcome conduct of a sexual nature, as Sexual Harassment.

Examples of such conduct/circumstances are:

- (a) Retaliation in any manner, for complaining against Sexual Harassment or giving evidence in support of such a complaint;
- (b) implied or explicit promise of preferential treatment in the harassed person's employment;
- (c) implied or explicit threat of detrimental treatment in the harassed person's employment;
- (d) implied or explicit threat about the harassed person's present or future employment status;
- (e) circumstances interfering with the harassed person's work or creating an intimidating or offensive or hostile work environment;
- (f) Humiliating treatment likely to affect the harassed person's health or safety.

4. PREVENTION OF SEXUAL HARASSMENT

- (A) The Company believes that Sexual Harassment can be eliminated through awareness.
- (B) The Company will spread awareness within its organization through periodic communication about Sexual Harassment and its consequences for the individuals involved.
- (C) The Company will also take other appropriate steps as may be required to prevent and eliminate Sexual Harassment from its workenvironment.

5. REDRESSAL OF COMPLAINTS

- (A) The Company has constituted an Internal Committee ("IC") to investigate and decide complaints of Sexual Harassment covered by this Policy.
- (B) The names and contact details of the IC members are listed in **Appendix A** to this Policy.
- (C) Anyone who faces or is affected by Sexual Harassment in the situations covered by this Policy (refer Section 2 above) may make a complaint of Sexual Harassment.
- (D) The procedures and time frames for filing, investigating and deciding complaints; and rights and obligations of the parties involved in the complaint are detailed in **Appendix B** to this Policy.

6. PUNISHMENT FOR SEXUAL HARASSMENT

- (A) The Company shall take suitable action as recommended by the IC against any employee who is found guilty of Sexual Harassment after due investigation by the IC. Such action may include one or more of the following:
- a warning,
 - a written apology,
 - mandatory counseling sessions or community service,
 - fines,
 - withholding of promotions or increments,
 - suspension from service,
 - Termination of service.
- (B) Any person who is found guilty of Sexual Harassment of a woman after due investigation by the IC, shall be liable to pay compensation for any losses suffered by the harassed woman due to such Sexual Harassment.
- (C) The following acts of Sexual Harassment by a man are also criminal offences under the Indian Penal Code and are punishable as described below:
- (a) physical contact and advances involving unwelcome and explicit sexual overtures;
 - (b) a demand or request for sexual favors;
 - (c) showing pornography against the will of a woman;
 - (d) Making sexually colored remarks.
- The offences under (a), (b) and (c) are punishable with fine and/or rigorous imprisonment of up to 3 years. The offence under (d) is punishable with fine and/or simple or rigorous imprisonment of up to 1 year.

7. CONSEQUENCES OF MAKING FALSE OR MALICIOUS COMPLAINTS

If the IC concludes that a complaint is intentionally false or malicious or that any person has intentionally provided false or misleading evidence of any kind, the person who knowingly made such a false or malicious complaint or knowingly provided such false or misleading evidence may be punished in the same manner as described in Para 6(A) and (B) above. A complaint will not be automatically treated as false or malicious just because of failure to prove that Sexual Harassment occurred.

8. CONFIDENTIALITY

Privacy and dignity of individuals must be respected and matters of Sexual Harassment must be treated with great sensitivity. Therefore, all information pertaining to any complaints of Sexual Harassment should be treated as private and confidential and should not be disclosed to anyone other than the IC or the parties involved in the complaint and, to a limited extent, only to those persons strictly on a “need to know” basis and who are expected to implement the decisions of the IC. Anyone breaching this obligation of confidentiality shall be liable to pay the Company a fine of Rupees Five Thousand (Rs.5000.00).

9. AMENDMENTS

The Company may amend this Policy and the related Appendices from time to time to reflect any changes in the applicable laws or even otherwise to ensure that its work environment is free from sexual harassment.

Appendix A

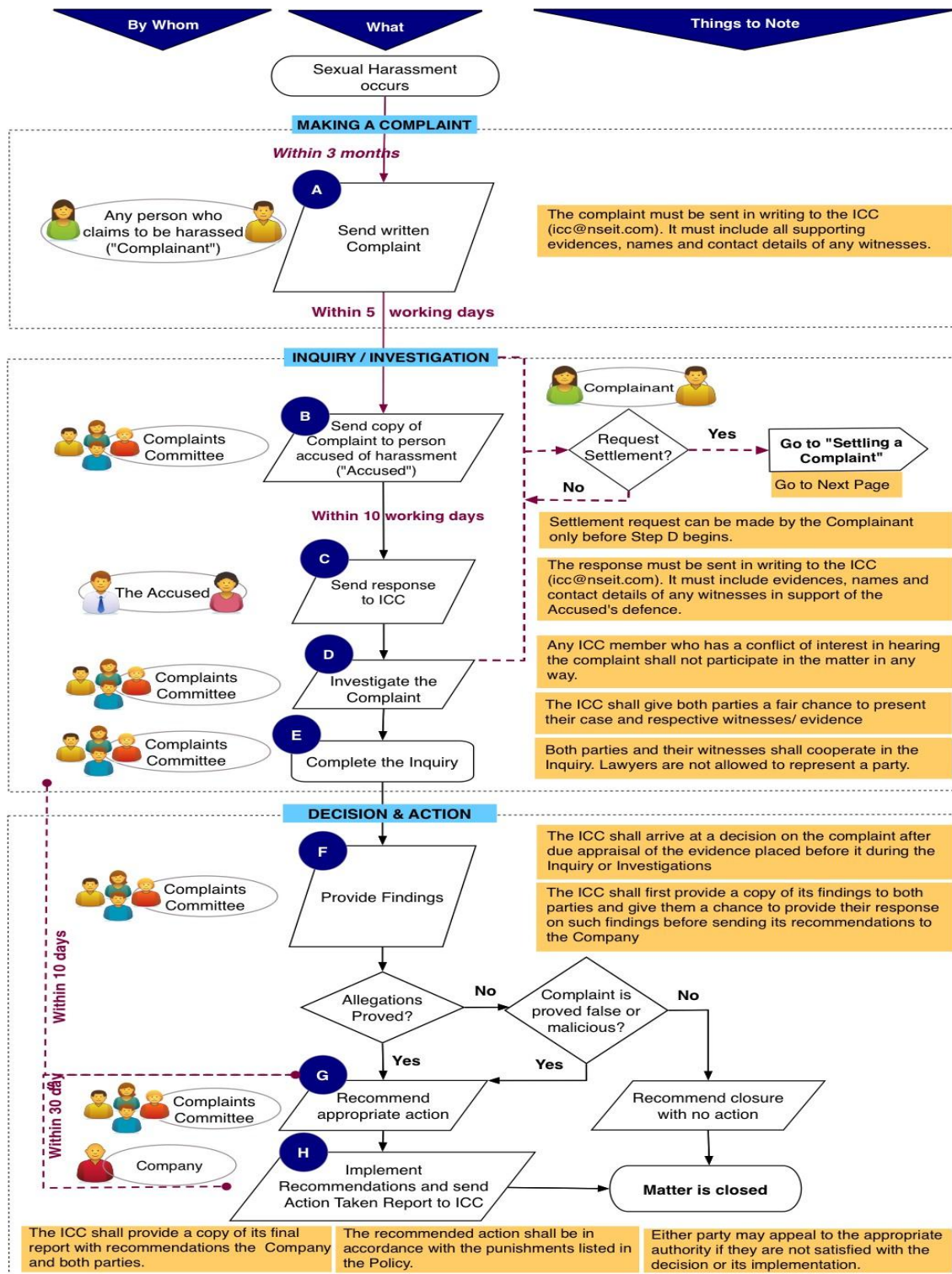
INTERNAL COMMITTEE

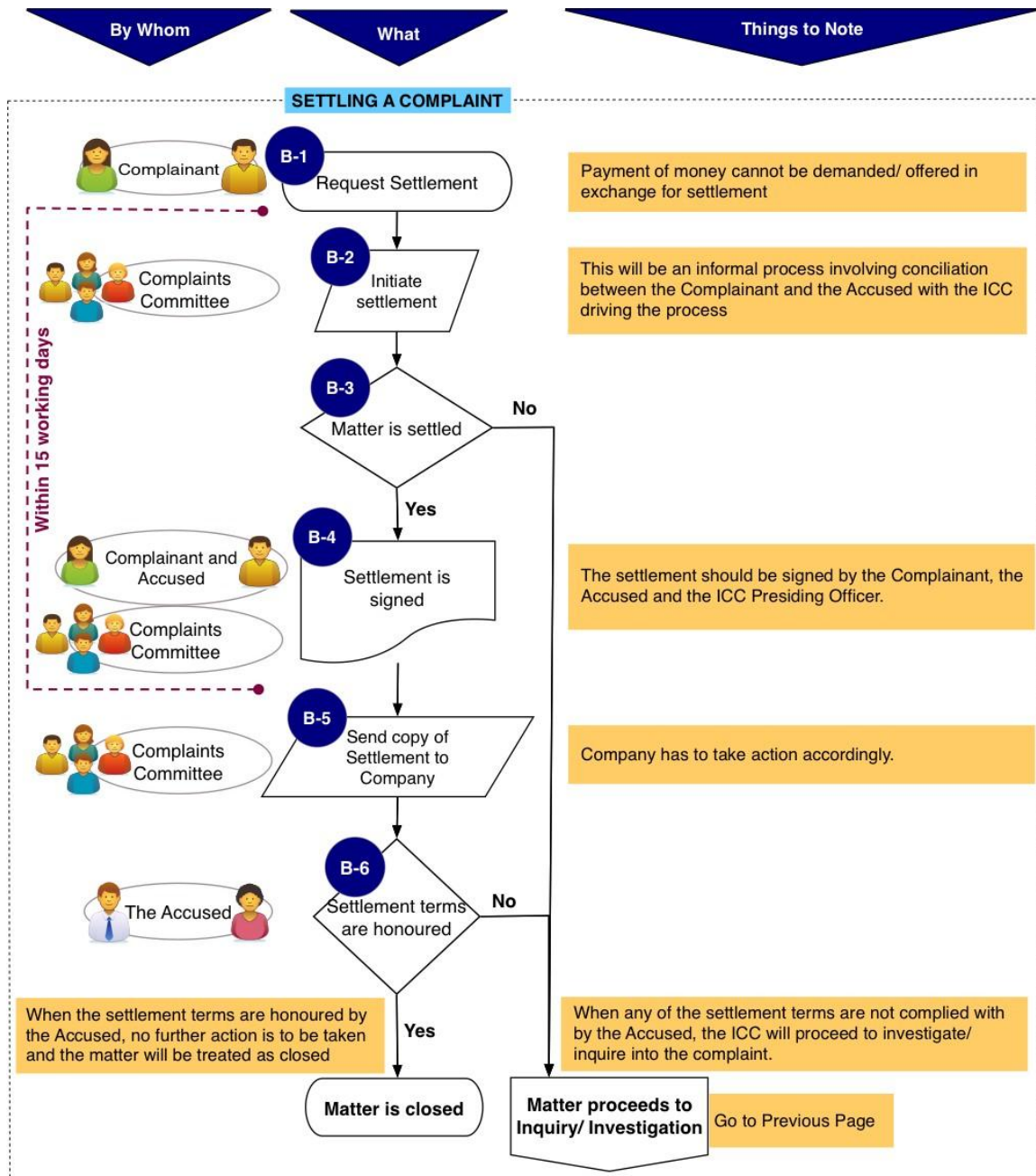
The IC team can be contacted on the group id (ICC@nusummit.com) or their individual contact details as listed below:-

POSH Committee Members for Mumbai / Chennai Location

Sr.No.	Name of the Employee	Details of ICC	Location	New Email Id
1	Vidhya Kanekar	Presiding Officer	Mumbai	vidhya.kanekar@nusummit.com
2	Adv. Baban Rajale	External Member	Mumbai	brajale@rediffmail.com
3	Tina Mathew	Internal Member	Mumbai	tina.mathew@nusummit.com
4	Hiren Bhat	Internal Member	Mumbai	hiren.bhatt@nusummit.com
5	Supriya Tiwari	Internal Member	Mumbai	supriya@nusummit.com
6	Suma Nair	Internal Member	Mumbai	suma.nair@nusummit.com
7	Suneeti Sudame	Internal Member	Mumbai	suneeti.sudame@nusummit.com
8	Gunjan Dhoot	Internal Member	Mumbai	gunjan.dhoot@nusummit.com
9	Pritish Nadkarni	Internal Member	Mumbai	pritish.nadkarni@nusummit.com
10	Ridhi Vaid	Internal Member	Mumbai	ridhi.vaid@nusummit.com
11	Annette Roberts	Internal Member	Mumbai	annette.roberts@nusummit.com
12	Araddhya Nikam	Internal Member	Mumbai	araddhya.nikam@nusummit.com
	Chennai			
13	Nadia Makhani	External Member	Chennai	nadiaamakhani@gmail.com
14	Anand Krishnamoorthi	Internal Member	Chennai	anand.krishnamurthi@nusummit.com

Appendix B

COMPLAINT PROCESS



10. OTHER IMPORTANT RULES APPLICABLE TO THE COMPLAINTS PROCESS:

- (1) The Accused should refrain from interacting with the Complainant and any of the Complainant's witnesses or retaliating against them in any manner.
- (2) Both parties and their respective witnesses shall appear before the IC whenever required for the purposes of the Inquiry. They shall also produce all necessary information and/or documents demanded by the IC in relation to investigation of the Complaint.
- (3) During the pendency of the Inquiry, the Complainant may request the IC to:
 - (a) transfer the Complainant or the Accused to another office of the Company;
 - (b) grant him/her leave from work;
 - (c) prohibit the Accused from appraising the work performance of the Complainant and his/her witnesses.

The IC will consider such requests but is not bound to accept the same if it believes the situation does not warrant it. If the IC accepts the request, it will recommend implementation of the same to the Company. However, it cannot recommend grant of leave exceeding 3 months. The Company will report back to the IC on the implementation of the recommendations.

- (4) Information regarding the Complaint or the investigations or the names or addresses of the parties involved or action taken; shall not be disclosed to any one except those involved in the investigations and implementation of the IC's recommendations

EFFECTIVE DATE

Version Number	Effective Date of Policy	Updates
Initial	1-Dec-24	First Draft