The following policies are applicable to all staff, including permanent employees, people on contract, consultants, advisors, retainers, interns, trainees and all individuals working directly for IL&FS, unless otherwise specifically mentioned

I. Service Code of Conduct :

The purpose of this is to define a Service Code of Conduct for all staff of IL&FS. The Service Code of Conduct would be applicable to all staff immediately on their joining the Company, and all staff would be deemed to have read and understood the Service Code of Conduct on joining the Company

Any staff found breaching the Service Code of Conduct would be liable for disciplinary action by the appropriate authority, including termination of services, if so required

1. Outside Business : Each officer and the staff must obtain prior written approval of the Company with respect to outside business activities. Prior to engaging in such activities, an officer or the staff must obtain necessary approvals from the Competent Authority. Such approval, if granted, may be given subject to restrictions or qualifications and is revocable at any time. Examples of activities requiring prior written approval include full or part-time service as an officer, director, partner, consultant or staff of another business organisation (including acting as a director of a company whose securities are publicly traded); contributing (whether for payment or not) written articles in newspapers, magazines, journals of professional or trade 'bodies, etc.; agreements to provide financial advice to a

   Private, educational or charitable organization, and any agreement to be employed by or accept compensation in any form (e.g. salary, fee, commission, bonus etc) from a person or entity other than the Company or its subsidiaries and affiliates

2. Confidentiality : All staff shall maintain the strictest confidentiality regarding the Company's affairs and the affairs of its constituents, and shall not divulge, directly or indirectly, any information either to a member of the public or of the Company's staff, unless compelled to do so by a judicial or other regulatory authority or unless instructed to do so by a superior officer in discharge of his duties. Any attendant liability that may arise out against the Company due to the breach of secrecy by the staff will be entirely to the staff's account

3. Compliance : All staff in discharging their duties, shall fully and promptly comply with all the applicable statutory and regulatory requirements, and if in doubt shall refer the matter to his supervisor and / or the competent authority for advice

4. Honesty & Integrity : All staff shall serve the Company honestly and faithfully and shall use his utmost endeavors to promote the interests of the Company and shall show courtesy and attention in all transactions and dealings with the Company's constituents

5. Media Contact : No staff shall, except with the prior sanction of the Competent Authority, own wholly or in part, or conduct or participate in the editing or management of any newspaper or any other periodical / publication. Further, no staff shall, except with the prior sanction of the Competent Authority or except in the bonafide discharge of his duties, participate in any radio broadcast or give any interview to a Programme telecast on Television, or contribute to any article or write any letter to any newspaper or periodical or make public or publish or cause to be published any documents, papers or information that shall relate to the business of the Company and which may have come into his possession in his official capacity. Any staff in breach of the above shall be held responsible for any loss or damage that may be caused to the Company

6. No staff shall, without the prior sanction of the Company, except in the discharge of his official duties, take part in the registration, promotion or management of a Company which is required to be registered under the Companies Act, 1956 (1 of 1956)

7. No staff shall bring or attempt to bring any political or other outside influence to bear upon any superior authority to further his interests in respect of matters pertaining to his services in the Company

8. In carrying out the business of the Company or in any matter involving the Company, no staff shall resort to bribing or offering any monetary benefit or in any way offering any favour other than in the normal course of business, to any official, government, regulatory or otherwise. No staff shall accept, seek, solicit, or accept, for his personal benefit, any gifts or presents in cash or of significant monetary value, for the professional services rendered or business deals done on behalf of the Company, from existing and / or prospective constituents.

9. Usage of Electronic / Internet facilities : The Company makes available various electronic facilities such as computer, printing, internet, etc. The use of these facilities by staff should be restricted solely to official purpose and for conducting the business of the Company. Any deviations of this in a manner other than described herein would require the approval of the Competent Authority

10. Abusive Substances : All staff shall refrain from subjecting themselves to any prohibited abusive substances such as narcotics and shall refrain from attending work and remaining in office premises while under the influence of any substance that impairs mental faculties (e.g. alcohol). As smoking is a potential health hazard for the smoker as well as the surrounding persons, no staff shall be permitted to smoke in the office premises other than in designated areas

11. Third Party Intellectual Rights : In the course of performance of their official duties, all staff will use or have access to Software, Databases and other materials in which third parties have copyright or other proprietary interest. These third party intellectual property rights shall be honored by the staff and the said materials shall not be copied (includes loading software or other material onto the hard drive of a computer, copying it onto a disk and any other transmission of material e.g., sending via e-mail) without obtaining the permission of the copyright owner. No staff should accept, solicit or seek rewards, compensation, gifts, or presents, of any significant monetary value, for his personal benefit, for the professional services rendered or business deals done on behalf of IL&FS, from existing and / or prospective constituents

12. Dress Code and Decorum : In order to project a professional business image of the Company and to maintain a sober and decorous working atmosphere, all staff shall be expected to adhere to a sober dress code. For normal working days, this will be formal wear and tie for gentlemen, and either saris, salwar suits or formal office wear for ladies. Staff are not permitted on working days to wear Jeans, T-shirts, or any clothing that is likely to affect the working environment adversely or convey an adverse image of the Company

    The dress code on weekends and holidays may be casual, except when official meetings have been planned on such days. Further, given the 'open office' system being followed in most IL&FS offices, all staff are also urged to observe decorum at work and to desist from unnecessary and unseeming loud and boisterous behavior

13. All staff shall fully comply with all applicable statutory/regulatory requirements and IL&FS's Corporate Policies and Procedures as mentioned in the above sections in respect of his department activities. In case of doubt, he should approach his supervisor for necessary guidance

14. Without prejudice to the provisions of the other Rules, a staff who commits a breach of the Rules of the Company, or who displays negligence, inefficiency or indolence, or who knowingly does anything detrimental to the interests of the Company or in conflict with its instructions, or who commits a breach of discipline or is guilty of any act of misconduct, shall be liable to the following penalties :

(a) Reprimand

(b) Postponement or stoppage of increment or promotion

(c) Demotion to a lower post or grade or to a lower stage in his incremental scale

(d) Recovery of the whole or part of any pecuniary loss caused to the Company

(e) Discharge

(f) Dismissal

15. A staff may be placed under suspension by the officer empowered to pass such orders. During such suspension, he shall receive a subsistence allowance as per the applicable laws, to be adjusted against salary and benefits at the final disposal of the case

II. Sexual Harassment of Women at Workplace Policy

1. Introduction

Infrastructure Leasing & Financial Services Limited (hereinafter referred to as "**Employer**") is committed to maintaining an environment where all women, enjoy a safe, friendly and supportive working environment, free of harassment and exploitation. Sexual harassment (as defined below) and abuse damages both individual and organizational health

In view of the aforesaid, and in light of the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**Act**"), the objective of this Policy is to :

(a) provide protection against sexual harassment of women at workplace; and

(b) prevention and redressal of Complaints (as defined below) of sexual harassment

The terms of this Policy should be read in conjunction with the Act and the Rules framed there under. In case of any inconsistency between this Policy and the Act/Rules, then the Act/Rules (as amended and modified from time to time) shall prevail. All staff should be aware that the Employer is strongly opposed to sexual harassment and such behavior is prohibited. Violation of this Policy will not be permitted and will result in disciplinary action, including termination of services

2. Applicability

This Policy is applicable to (i) persons employed at the workplace by the Employer for any work *on a* regular, temporary ad hoc or daily wage basis, either directly or through an agent including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, probationer, trainee, apprentice or called by any other such name and; (ii) any aggrieved woman at workplace, who alleges to have been subjected to any sexual harassment ("**Complainant**")

3. Aggrieved Woman :

In relation to a workplace an aggrieved woman means a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. Any women employed at a workplace for any work on regular, temporary, adhoc, or daily wage basis either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name

4. Workplace :

Any place visited by the staff arising out of or during the course of employment, including transportation provided by the employer for undertaking such a journey. A workplace includes private sector organisations, or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, vocational, educational, entertainment, industrial, health services or financial activities, including production, supply, sale, distribution or service.

It also includes hospitals and nursing homes, sports institutes, stadiums, sports complex or competition or games venue, whether residential or not used for training, sports or other activities

5. What is Sexual harassment?

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

(a) Physical contact and advances; or

(b) A demand or request for sexual favours, such as seeking sexual favours or advances in exchange for work benefits or refusal to comply with a 'request' is met with retaliatory action such as dismissal, demotion, difficult work conditions; or

(c) Sexually coloured remarks; or

(d) Showing pornography; or

(e) Entry into a private place marked for woman, with the intent to commit mischief and harassment; or

(f) Taking photographs of aggrieved woman without permission and converting it into pornographic material and/or circulating the same by means of electronic media; or

(g) Any other unwelcomed physical, verbal or non-verbal conduct of sexual nature; including eve-teasing, gender based insults or sexist remarks, unwelcome sexual overtone in any manner, like obnoxious telephone calls, touching or brushing against any part of the body, displaying pornographic or other offensive or derogatory pictures, cartoons, pamphlets or sayings, forcible physical touch or molestation

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

(a) Implied or explicit promise of preferential treatment in her employment, or

(b) Implied or explicit threat of detrimental treatment in her employment; or

(c) Implied or explicit threat about her present or future employment status; or

(d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or

(e) Humiliating treatment likely to affect her health or safety

Sexual harassment shall also include such unwelcome sexually determined behavior by any person either individually or in association with other persons or by any person in authority whether directly or by implication which amounts to offence defined in the Indian Penal Code.

6. <u>If you are being harassed</u>

(a) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a Complaint, but a record can strengthen your case and helps you remember the details over time, in case the Complaint is not filed immediately

(b) May try telling the harasser that his behaviour is unwelcome and ask him to stop

(c) File a Complaint as soon as possible and, report the abuse to the Internal Complaints Committee formed for this purpose

7. Constitution of Internal Complaints Committee

(a) A Committee known as the "Internal Complaints Committee" (ICC) at Mumbai has been constituted, and has nominated the following members :

Name		Company
Dr Archana Hingorani	Presiding Officer	IIML
Mr Vibhav Kapoor	Member	IL&FS
Mr Milind Patel	Member	IFIN
Ms Shikha Bagai	Member	IL&FS
Ms Navita Yadav	Member	ITCL
Ms.Piali Syam	NGO	-

(b) A Committee known as the "Internal Complaints Committee" (ICC) at Delhi / NCR has been constituted , and has nominated the following members :

Name		Company
Dr Archana Hingorani	Presiding Officer	IIML
Mr RCM Reddy	Member	IL&FS
Mr Vibhav Kapoor	Member	IL&FS
Ms Monisha Macedo	Member	NTBCL
Ms Amrita Singh	Member	IRL
Ms Namrata Mukherjee	Member	IEDCL
Dr Ranjana Kaul	External Member	-

(c) The term of the members of the ICC will not exceed three years from the date of their nomination

(d) An exclusive email id being ICCChairperson@ilfsindia.com is created with access only to the ICC

(e) All staff shall address any sexual harassment complaints only to the ICC and not to talk or disclose information on the case to anybody else except to persons permitted to make a complaint on behalf of the Complainant as set out in this policy

(f) Meetings of the ICC to be held :

i. Every quarter

ii. Within 7 (seven) days from receipt of Complaint

iii. Such other special meetings to address the Complaints pertaining to sexual harassment of the female staff

(g) It shall prepare an annual report in each calendar year and submit the same to the Employer and the District Officer which shall have the following details :

i. Number of complaints of sexual harassment received in the year

ii. Number of complaints disposed off during the year

iii. Number of cases pending for more than ninety days

iv. Number of workshops or awareness programmes against sexual harassment carried out

v. Nature of actions taken by the Employer

(h) In conducting the inquiry, a minimum of three members of the ICC including the Presiding Member shall be present

8. Filing Complaint with ICC

(a) The procedure for filing the Complaint is contained in Annexure A subject to such amendments/modifications as per applicable laws

(b) Indicative formats of the Complaint, reply of Respondent and statement of witnesses are annexed hereto as Annexures B, C and D respectively (which formats may be modified by the ICC members as may be necessary from time to time). The formats may be followed by the Complainant and Respondent as required

9. Settlement of Complaint

(a) Before initiating an inquiry on the Complaint, ICC may at the request of the Complainant take steps to settle the matter between her and the Respondent through conciliation, provided that monetary settlement shall not be made a basis of conciliation

(b) If a settlement has been arrived at, the ICC shall :

i. Record the settlement and forward the same to the Employer to take action as specified in the recommendation; and

ii. Provide copies of the settlement as recorded to the Complainant and the Respondent and no further inquiry shall be conducted.

iii. The indicative format of the settlement is annexed as **Annexure E,** which may be modified by the ICC members as may be necessary from time to time

10. Termination of Inquiry /Ex-Parte Order

The ICC shall, after giving prior fifteen days' notice in writing to the concerned party, have the right to terminate the inquiry proceedings or pass an ex-parte decision on the Complaint, if the Complainant or Respondent fails, without sufficient cause, to present herself or himself for three consecutive meetings of the convened by the Presiding Officer

11. Inquiry of complaint by ICC

(a) In case no conciliation has been arrived at or the terms of conciliation are not complied with, then at the request of the Complainant (where the Respondent is a staff), the ICC shall proceed to make an inquiry into the Complaint in accordance with the provisions of the service rules applicable to the Respondent or in accordance with the Rules formulated under the Act

(b) During the course of inquiry :

i. Where both the Complainant and the Respondent are staff, both the parties shall be given an opportunity of being heard;

ii. A copy of the findings shall be made available to both the parties enabling them to make representation against the findings before ICC;

iii. Both the Complainant and the Respondent will be interviewed, and also such individuals who may be able to provide relevant information;

iv. ICC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 namely summoning and enforcing attendance of any person and examining him on oath and requiring the discovery and production of documents

v. ICC shall make inquiry into the complaint in accordance with the principles of natural justice.

(c) The inquiry shall be completed within a period of ninety days

(d) The parties shall not be permitted to bring any legal practitioner to represent them in their case at any stage of the proceedings before the ICC

12. Action Pending Inquiry by ICC

During the pendency of an inquiry, on a written request made by the Complainant, ICC may recommend to the Employer to :

(a) Transfer the Complainant or the Respondent to any other workplace; or

(b) Grant leave to the Complainant upto a period of three months (this leave shall be in addition to the leave she would be otherwise entitled); or

(c) Restrain the Respondent from reporting on the work performance of the Complainant or writing her confidential report and assign the same to another officer

On the receipt of recommendation from ICC, the Employer shall promptly implement the recommendations made and send the report of such implementation to ICC

13. Completion of Inquiry by ICC

On completion of the inquiry proceedings:

(a) ICC shall provide a report of its findings to the Employer, within a period of ten days from the date of completion of the inquiry and such report shall be made available to the concerned parties. An indicative format of the said Report is annexed as Annexure F which may be modified by the ICC members as may be necessary from time to time;

(b) Where ICC arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend the Employer that no action is required to be taken in the matter;

(c) Where ICC arrives at a conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer :

i. To take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the Respondent or, in the following manner including :

- Written apology
- Warning
- Reprimand or censure
- Withholding of promotion
- Postponement or withholding or stoppage of increment, performance related pay or promotion or pay rise
- Demotion to a lower post or grade or to a lower stage in his incremental scale
- Suspension
- Termination of services
- Undergoing a counseling session
- Carrying out community service

ii. To deduct, notwithstanding anything in the service rules applicable to the Respondent, from the salary or the wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to her legal heirs. For the purpose of determining the sums to be paid to the Complainant, ICC shall have regard to

- The mental trauma, pain, suffering and emotional distress caused to the Complainant
- The loss in the career opportunity due to the incident of sexual harassment
- Medical expenses incurred by the Complainant for physical or psychiatric treatment
- The income and financial status of the Respondent
- Feasibility of such payment in lump sum or in installments

iii. In case Employer is unable to make such deduction from the salary of the Respondent due to his being absent from duty or cessation of employment, it may direct the Respondent to pay such sums to the Complainant. Further, in case Respondent fails to pay such sums, ICC may forward the order for recovery of the sum as arrears of land revenue to the concerned District Officer

iv. To take disciplinary action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the Respondent

(d) Where ICC arrives at a conclusion that during an inquiry, any witness has given false evidence or produced any forged or misleading document, it may recommend to the Employer of the witness, to take action in accordance with Clause 11(c)(i) above

14. Appeal

(a) Any person aggrieved on account of recommendations made by ICC or due to non-implementation of such recommendations by the Employer, may prefer an appeal to the court or tribunal in accordance with the Rules framed under the Act

(b) The appeal shall be made within a period of ninety days of the recommendations of ICC

15. Action by Employer on recommendation made by ICC on conclusion of inquiry

The Employer shall act on the recommendation made by ICC within sixty days of its receipt

16. Protection against retaliation

Regardless of the outcome of the Complaint made in good faith, the Complainant and any person providing information or any witness, will be protected from any form of retaliation. While dealing with Complaints of sexual harassment, ICC shall ensure that the Complainant or the witness(es) are not victimized or discriminated against by the Respondent. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the Respondent against the Complainant while the inquiry is in progress should be reported by the Complainant to ICC as soon as possible. Disciplinary action will be taken by ICC against any such complaints which are found genuine

17. Malicious complaint

If ICC 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 has produced forged or misleading documents, it may recommend to the Employer, to take action against the Complainant in accordance with the provisions of the service rules as applicable or as in accordance with Clause 11(c)(i) above. However, failure/ inability to substantiate /prove a claim of sexual harassment does not constitute proof of a false and / or malicious accusation. Malicious intent on the part of the Complainant shall be established after an inquiry in accordance with the procedure prescribed under the service rules, before any action is recommended

18. Confidentiality

(a) It shall be the duty of all the persons including members of ICC involved to ensure that the Complaint, identity and addresses of the Complainant, Respondent, witnesses, any information relating to conciliation and inquiry proceedings, recommendations of ICC and/or action taken by the Employer shall not be published, communicated or made known to public, press and media in any manner and shall be strictly confidential

(b) The members of the ICC and the Employer shall use best endeavours to ensure to keep the investigation and disseminate information on a strict "need to know" basis. The ICC shall emphasize to all persons involved in the investigation, including the Complainant, the Respondent and witnesses, that the policy is to keep discussions strictly confidential and that disciplinary consequences may result from a breach of this confidence

(c) In any event, the ICC shall make best efforts to

i. Limit the number of persons who have access to the aforesaid information

ii. Avoid needless disclosure of information to witnesses

(d) However, information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses

(e) If any person who is entrusted with the duty to handle or deal with the Complaint, inquiry or any recommendations or actions to be taken under the provisions of the Act) contravenes the aforesaid, then he/she shall be liable for penalty in accordance with the service rules or the Employer shall recover a sum of five thousand rupees as penalty from such person.

19. Invitees

If the ICC considers it is necessary for achieving the objectives of the Act, the ICC may call upon persons :

(a) To appear as witnesses during the inquiry proceedings to provide factual information/details regarding the Complainant, the Respondent or any other similar matter; or

(b) To provide general guidance and training to the members of the ICC; or

(c) To assist and advise the ICC members in conducting the investigations to the complaint, without being a part of the inquiry proceedings. However, it is pertinent to note that the inputs provided by these invitees shall not :

i. Be binding on the members of ICC;

ii. Directly or indirectly or in any other manner, dilute and/or transfer the powers/obligations and rights of the members of the ICC as provided under the Act and/or the Rules framed thereunder

20. Duties of the Employer

Subject to the provisions of the Act and Rules, the duties of the Employer is shall be as contained in 'Annexure G'

21. Modifications to the Policy

The provisions of this Policy can be altered, added to, varied or substituted from time to time at the discretion of a competent authority as maybe designated by the Employer

Annexure A

Procedure for filing complaint

(1) The Complaint should be made by the Complainant in writing. In case where the Complaint cannot be made in writing, the Presiding Officer or any member of the ICC shall render all reasonable assistance to the Complainant to make the Complaint in writing

(2) Where the Complainant is unable to make a complaint on account of her physical incapacity, Complaint may be filed by:

i. Her relative or friend;
ii. Her co-worker;
iii. An officer of the National Commission for Women or State Women's Commission;
iv. Any person who has knowledge of the incident with the written consent of the Complainant

(3) Where the Complainant is unable to make a complaint on account of her mental incapacity, Complaint may be filed by:

(a) Her relative or friend;
(b) A special educator
(c) A qualified psychiatrist or psychologist
(d) The guardian or authority under whose care she is receiving treatment or care; or
(e) Any person who has knowledge of the incident jointly with her relative or friend or a special educator or a a qualified psychiatrist or psychologist or a guardian or authority under whose care she is receiving treatment or care;

(4) Where the Complainant for any other reason is unable to make a complaint, a Complaint may be filed by any person who has knowledge of the incident, with the Complainant's written consent

(5) Where the Complainant is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the legal heir

(6) The Complaint of sexual harassment at workplace to the ICC should be filed within a period of 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

(7) However, the ICC may for reasons recorded in writing extend the said period for a further period not exceeding three months, if it is satisfied that circumstances prevented the Complainant from filing the Complaint within the said period

(8) The Complainant shall file six copies of the Complaint and should include the name of the Respondent, details of the incidents (dates, times, locations, names and addresses of possible witness, what happened, supporting documents, response of the Complainant). In addition to the aforesaid, where possible, the Complainant should also forward a copy of the Complaint to ICCChairperson@ilfsindia.com

(9) A Non-Disclosure Undertaking shall be signed by all individuals concerned with the Complaint; including the Complainant, the Respondent, witnesses (if any) prior to commencing an inquiry. The indicative format of the Non- Disclosure Undertaking is annexed as Annexure H, which may be modified by the ICC members as may be necessary from time to time

(10) One of the copies of the Complaint shall be sent to the Respondent within seven working days of the receipt of the Complaint

(11) The Respondent shall file his reply to the Complaint along with his list of documents and names and addresses of witnesses within a period not exceeding ten working days from the date of receipt of the Complaint.

Annexure B

Format of the Complaint

S. No.	Query	Particulars
1)	Name of Complainant	
2)	Address and contact number of the Complainant	
3)	Name, address and contact of next of kin of the Complainant	
4)	Designation of the Complainant	
5)	Immediate supervisor of the Complainant	
6)	Employer of the Complainant	
7)	Name of Respondent	
8)	Address and contact number of the Respondent, if available	
9)	Name, address and contact of next of kin of the Respondent, if known	
10)	Designation of the Respondent, if known	
12)	Immediate supervisor of the Respondent, if known	
13)	Employer of the Respondent, if known	
	Details of the incident	
14)	Date and time of incident (If more than one, kindly mention all the dates and times)	
15)	Place of incident (If more than one, kindly mention all the places)	
16)	Details of the incident	
17)	Witnesses to the incident, if any (If more than one, kindly mention all the witnesses)	
18)	Any oral or written evidence of the incident (attach copies of the documents, if any)	
19)	Names and addresses of person(s) who the Complainant confided in about the incident, if applicable	
20)	Any further relevant details	
I state that the information as stated above is true and accurate		
Date:		
Signature of Complainant		

Annexure C

Format of the Reply of the Respondent

S. No.	Query	Particulars
1)	Name of Respondent	
2)	Address and contact number	
3)	Name, address and contact of next of kin	
4)	Designation	
5)	Immediate supervisor	
6)	Employer	
	Details of the incident	
7)	Defenses of the Respondent	
8)	Any oral or written evidence supporting the Respondent's defence (attach copies of the documents, if any)	
9)	Witnesses to support the Respondent's defence, if any (If more than one, kindly mention all the witnesses)	
10)	Any further details	
I state that the information as stated above is true and accurate		
Date:		
Signature of Respondent		

Annexure D

Format of Witness statement

S. No.	Query	Particulars
1)	Name of witness	
2)	Address and contact number	
3)	Designation	
4)	Immediate supervisor	
5)	Employer	
6)	Witness for Complainant or Respondent	
	Details of the incident	
7)	Date and time of incident(s)	
8)	Place of incident(s)	
9)	Circumstances	
10)	Number of occurrences witnessed	
11)	Reaction to the incident by Complainant/ Respondent	
12)	Any oral or written evidence of the incident	
13)	Any further details	

I state that the information as stated above is true and accurate. I hereby confirm that I shall at all times maintain the confidentiality of all information that I am privy to and that may be shared with during the course of the inquiry proceedings. I will not, either directly or indirectly, make any disclosure of any confidential information to any third party.

Date:

Signature of Witness

Annexure E

Format for Settlement through the conciliation mechanism

[On the letterhead of the ICC]

[Date]

[_____] .. Complainant

[_____] .. Respondent

ICC Members present:

[_]
[_]
[_]

The Complainant had filed a Complaint dated [_] with the ICC in relation to certain allegations against the Respondent. The Complaint had been duly taken on record by the ICC and had sent a copy of the Complaint to the Respondent within [] days.

The ICC has not yet initiated an inquiry into this matter.

The Complainant had [1]through her letter dated [__] requested the ICC to settle the matter between the Complainant and the Respondent.

The parties have thus reached a settlement and the terms of which are as under:

[_____]

The Respondent shall comply with the aforesaid terms and conditions within [__] days of the date hereof.

Annexure F

Format of the Report of the ICC

Sr. No.	Broad Heads	Particulars
1)	Name and other details of the Complainant	
2)	Name and other details of the Respondent	
3)	Date of complaint	
4)	Whether the inquiry has been concluded within 90 days of receipt of Complaint	
5)	Documentation/ oral evidence relied upon by the Complainant	
6)	Documentation/ oral evidence relied upon by the Respondent	
7)	Whether the Complainant requested conciliation and settlement of the matter and if yes, the reason why the complaint was not settled	
8)	Any recommendation for interim action pending completion of inquiry	
9)	Reasons for the recommendation	
10)	Detailed facts of the incident	
11)	Whether the incident can be termed as sexual harassment under the Act	
12)	Detailed reasons for the decision in XI above	
13)	Action recommended against the Respondent	
14)	Reasons for recommending the said action	
15)	Whether the Complainant has filed a criminal action against the Respondent and status of the same	
Date:		
Signature of the ICC Members		

Annexure G

Duties of Employer

The Employer shall :

(1) Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;

(2) Display at any conspicuous place in the workplace, the penal consequences of sexual harassments and the order constituting the ICC;

(3) Formulate and widely disseminate an internal policy for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote a gender sensitive safe space and remove underlying factors that contribute towards a hostile work environment against women;

(4) Carry out awareness programmes for the staff and create forums for dialogues which may involve any other body as may be considered necessary

(5) Use modules developed by the State Government to organise and conduct workshops and awareness programmes at regular intervals for sensitizing the staff with the provisions of the Act

(6) Carry out orientation programmes and seminars for the members of ICC;

(7) Conduct capacity building and skill building programmes for the Members of the ICC

(8) Declare the names and contact details of all the Members of the ICC

(9) Provide necessary facilities to ICC for dealing with the Complaint and conducting an inquiry;

(10) Assist in securing the attendance of Respondent and witnesses before the ICC

(11) Make available such information to the ICC from time to time as it may require having regard to the Complaint;

(12) Provide assistance to the Complainant if she chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force

(13) Cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the Complainant so desires, where the perpetrator is not a staff in the workplace at which the incident of sexual harassment took place;

(14) Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct;

(15) Monitor the timely submission of reports by the ICC;

(16) Take all steps necessary and reasonable to assist the Complainant in terms of support and preventive action, where sexual harassment occurs at a workplace as a result of an act or omission by any third party or outsider;

(17) Include in its annual report number of cases filed, if any, and their disposal under this Policy;

(18) Shall remove any member/s of ICC, if the member :

(a) Contravenes confidentiality provisions stated in the Policy; or
(b) Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or
(c) Has been found guilty in any disciplinary proceedings or a disciplinary proceeding is Pending against him; or
(d) Has so abused his position as to render his continuance in office prejudicial to the public interest

(19) On occurrence of vacancy / removal of any member of ICC, fill in such vacancy by fresh nomination

Annexure H

NON DISCLOSURE UNDERTAKING

Date: [_____]

I, [_____] [s/o][d/o] Mr. [_____], having his/her permanent residing address at [_____] (hereinafter referred to as "**Recipient**") , working with [_____] as [_____] hereby execute this undertaking in relation to the complaint filed/to be filed or Inquiry proceedings initiated/to be initiated before the Internal Complaints Committee ("**ICC**") constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act ("**Act**"), 2013 by [_____] ("**Complainant**") against [_____] ("**Respondent**").

I hereby agree and irrevocably undertake that I shall keep the Complaint, identity and addresses of the Complainant, Respondent, witnesses, any information relating to conciliation and inquiry proceedings, recommendations of ICC and action taken by the Employer under the Act or any other information related thereto ("**Confidential Information**") strictly confidential and shall not either wilfully or through any other act, omission or negligence, share, distribute, disclose or howsoever cause or induce any other person to share, distribute or disclose either verbally, electronically or in writing any such Confidential Information to any person, other than as required under applicable laws.

I further undertake not to publish, communicate or make known to public, press or media the Confidential Information in any manner whatsoever.

I am aware and acknowledge that in case of breach of this Undertaking, I shall be liable for penal consequences and other consequences in accordance with the services rules and/ or as per applicable laws

Signed by

[_____]

III IT POLICIES

A. IT SYSYEM USAGE POLICY

1. Introduction

The Organization provides IT Assets and Services to the Users to conduct their business operations and to enhance the efficiency and quality of the same. Misuse (either intentionally or not) of the IT Assets may have serious consequences which may include loss / unauthorized disclosure of critical information, loss of productivity / efficiency, adverse publicity and/or legal liabilities which may eventually lead to significant business losses for the Organization. It is thus important to protect these IT Assets from illegal or damaging actions by Users to avoid exposing the Organization to any legal, reputational or financial risks

2. Objective

The objective of this policy is to govern the usage, storage and handling of IT Assets and information that is contained in these IT Assets

3. Responsibilities

(a) All Users shall adhere to the guidelines regarding usage of PCs and Mobile Devices

(b) IT Department :

i. Domain Specific Administrators shall be responsible for assisting the User from complying with the usage guidelines stated below

ii. IT Domain Specific Managers shall be responsible for supervising the Domain Specific Administrators

(c) Head of Departments shall be responsible for approving requests of the User with regard to usage of PCs and Mobile Devices

4. Policy Statements

(a) **General Policy**

i. Any electronic data created, modified, altered and/or transmitted using any of the IT Assets or Services of the Organization shall be the sole property of the Organization and the User shall not claim otherwise

ii. All usage of the IT Assets and/or Services shall be guided by the relevant IT Policies. The IT Assets and/or Services shall be primarily used for business purposes and may be used for reasonable personal use.

(b) **PC (Desktop / Laptop) Usage**

i. This shall be applicable to the computer systems (including a desktop or laptop) provided by the Organization for business use ("**PC**")

ii. All Users shall:

- Be responsible for the security of their PC and should take adequate measures to restrict physical and logical access to their PC.
- Not change any hardware configuration, settings in operating system of the PC or any applications installed on their PC
- Not install any software or applications on their PC unless on a request to the IT department
- Request the IT department for any change in hardware configuration, software settings or additional software
- Ensure only authorized software is installed on the PC of the user.

- Not download and/or store games, music or movie files in the PC

- Not to exchange/transfer of PC or any other IT equipment between Users or between organisations or across locations without seeking due approvals (including from IT Department).

- Ensure backup of their critical official data even though the data on the shared drive is backed up on the servers

- Use file servers for sharing files between multiple Users

- To prevent the risk of unauthorized access, ensure that:

    - The PCs are locked, if left unattended.

    - Standard screensaver and wall paper (approved by IT Department) shall be used.

    - Not enable sharing of folders with other Users which may lead to virus proliferation if the host computer is infected by a virus

- Take following precautions pertaining to the security of PCs:

    - Back up critical data regularly, especially before travelling with their laptop computers.

    - Not boot the PC from a removable media/device, to avoid the same being infected with virus/ malware

- Not change the display settings or IP addresses/subnets of the PC as has been set by the IT Department

- Not disclose the IP addressing scheme of the Organization to any third person

- Not use personal PCs on the network provided by the Organization

- Ensure that PC screens be kept clear of sensitive information when unattended

iii. To assist the User in complying with the above, the IT Department shall :

- Ensure all PCs be added in the central / regional domain of the Organization

- Ensure that critical system patches and updates for the PCs must be updated through central server

- At the request of any User and after receipt of due approvals, install such software after verification of the software to be installed, for license and security compliance

- Assist Users (in accordance with standard procedures) who have requested for any change in hardware configuration, software settings or additional software

- Remove/ uninstall any unauthorized / unlicensed software as and when the same is observed in any User's PC

- After receipt of due approvals, exchange/transfer PC or any other IT Assets between Users or between organisations or across locations in accordance with the standard procedure

- Ensure that PCs automatically lock after five minutes of inactivity.

- Provide any and all assistance to the User as maybe required from time to time

- Follow up with User/ facilitate Users to take backup of official data including corporate email systems like Lotus Notes

(c) **Mobile Device (Tablet/Smart Phones etc.) Usage**

i. This shall be applicable to all Users using a tablet/ smartphone having corporate email access ("**Mobile Device**")

ii. Users shall :

- Not be allowed to connect their personal mobile devices to the network of the Organization unless the same is checked and certified to be safe by IT Department
- Be responsible for the security of information contained in such Mobile Devices
- Secure the Mobile Devices using adequate password protection as stated in the IT Policies
- Install anti-virus software with latest signatures on the Mobile Devices
- Ensure that the Mobile Devices are periodically updated with all necessary security patches/ hot fixes for the operating system and applications installed on them.
- Ensure that their Mobile Devices are backed up at regular intervals.
- Take adequate measures for the physical protection of Mobile Devices including not leaving the same unattended in public places or while traveling.
- Immediately report the loss of the Mobile Devices to the IT Department (along with any other specific information as maybe required by them) to prevent misuse of data

iii. IT Department shall assist the User in achieving the aforesaid and provide timely support/ follow up with the Users on the same

5. Definitions of common terms used

(a) Patch: An update to an operating system, application, or other software issued specifically to correct particular problems with the software.

(b) Screensaver: Software program which executes when a computing device is in idle state

(c) Wallpaper: Image displayed on the desktop for personalization of a computing device

B. INTERNET USAGE POLICY

1. Introduction

Internet is a very powerful information resource. Proper use of the internet can enhance the capabilities of the User and the Organization. Access to the internet is a job necessity and helps in job enrichment by providing access to relevant resources at the click of a button. Since Internet is unregulated and uncensored, there are serious internet based risks which can paralyze the IT System of the Organization and result in loss or corruption of data and may also lead to statutory/regulatory implications. It is therefore necessary to set guidelines putting down appropriate internet usage restrictions upon the Users

2. Objective

The objective of this policy is to define the acceptable and unacceptable usage of the internet by Users

3. Responsibilities

(a) Users are responsible for adherence to the policy guidelines and reporting violation or misuse

(b) IT Security Administrators shall be responsible for managing compliance to this policy

(c) IT Domain Specific Administrators must comply with this policy, follow its guidelines, and adhere to the same, for all systems configuration and settings

(d) IT Domain Specific Managers are responsible for supervising the IT administrators towards adherence to the policy

4. Policy Statements

(a) **General Policy**

i. Usage of internet help in enhancing the performance of the staff in the following ways:

- Enhancement of Job :

  Persons given internet access are expected to use the internet to enhance the performance of their work responsibilities. The data and information available on the internet can provide invaluable assistance with certain job-related tasks.

- Enhancement of Organization :

  Beneficial uses might include research data, the discovery of work-related information, white papers, the downloading licensed product updates, or the use of special online services and features

- Enhancement of Skills :

  Persons are encouraged to use the resources on the internet to enhance existing job-related skills.

ii. Use for Official Business : The internet access is provided to Users as a business tool at significant cost. The facilities to provide internet access represents a considerable commitment of company resources for telecommunications, networking, software, storage, etc. Use of the internet by the Users should therefore be limited to

official and business purposes. Occasional and reasonable personal use of internet services may be permitted, provided however that such use is not for illegal or immoral purposes and does not interfere with work performance.

iii. Internet Access provided by the Organization :

- Users should access the internet only through the connectivity mediums (like wifi and LAN) provided by the Organization and should not set up any other internet access (like mobile access point or tethering from a mobile internet connection) without prior authorization from the IT Department

- All usage of internet services by the User should be in compliance with applicable Laws (including any rules, regulations and guidelines of the IT Act, SEBI guidelines or any statutory or regulatory compliance related to the Organization)

- The IT Department may restrict access to certain websites on the internet which affect the network performance of the Organization or are unethical or deemed malicious for the Organization at their sole discretion

- Notwithstanding the above, the Organization shall in its own discretion filter and/or prohibit access to certain websites

- Online conduct of the Users must reflect the ethics, professionalism, courtesy, and responsibility as expected by the Organization since the Users (while using the internet access provided by the Organizations) are acting as agents of the Organization

- Unauthorized or inappropriate use of the internet services by any User must be reported by users immediately to the IT Department

- Detection of external efforts to compromise the Organization's system security (for example by hackers) shall be reported immediately by any Users to the IT Department

(b) **Responsibilities**

i. All Users shall not:

- Download or distribute malicious software or tools or do anything similar activity to deliberately propagate any malware
- Stream and/or download media or video files or transfer bulky files (since this represent significant data traffic) which may cause network congestion. If any of the above is required by the User, it shall be done by the IT department
- Violate any copyright or license agreement by downloading and/or distributing copyright protected material or software available on the internet
- Upload files, software or data belonging to the Organization to any internet site or cloud software like Dropbox, Google Drive, OneDrive, etc. without prior authorization. Use only Secure File Transfer facilities provided by the IT Department in order to transfer bulky files
- Share any confidential and/or sensitive information of the Organization on or with any third person on any internet website unless the same is for official purposes which has been duly authorized
- Post any views and/or opinion on behalf of the Organization unless duly authorized
- Post remarks that are defamatory, racial, obscene or not in line with the Organization's policy
- Access obscene or explicit material available on the internet either directly or indirectly

- Conduct illegal or unethical activities including gambling or misrepresenting the Organization

- Conduct in any online stock trading activities for personal benefit

- Solicit money from any person or for advocating a religious or political cause from any persons via the internet

- Use the Organization's Services including internet services, resources or facilities for any purposes that violate applicable Laws

- Conduct activities which may compromise network security including without limitation disclosure of any system ids, passwords, and/or information that may allow the circumnavigation of security features of the IT Systems of the Organization.

- Tamper, disable or circumvent any security system implemented in the IT Systems by the Organization to ensure the safety and security of the same

- Use devices with their own internet data cards / Wi-Fi connection sharing, thereby establishing independent internet sessions having the effect of sidestepping the Organization's security mechanisms. This may be used by an attacker to compromise the IT Systems. Users should isolate the PC from the Organization's network before establishing a third party hosted internet connection

- Access any websites by clicking on links provide in emails or in other websites to prevent unauthorized access of any sensitive data (including financial information). Users should, if required, enter the URL manually instead of clicking on the provided link

iv. To achieve the aforesaid, IT Department shall educate the Users regarding the systems in place to track violations and non-adherence to the IT Policies, if any

(c) **Internet Usage Monitoring**

The Organization shall:

i. Have the right to access, monitor, record, review, store and audit internet usage of all Users to analyze usage patterns or assure system security

ii. If required under Law or on the request of a governmental authority, disclose any information with regard to the internet usage of any User

iii. Have the right to conduct any forensic analysis of any internet usage of any User or delegate the same to a third party as may be required by the Organization

5. Definitions

(a) **Wi-Fi:** A mechanism to connect to a computer network wirelessly

(b) **Hacker:** Unauthorized user who attempts to or gains access to an information system

C. CORPORATE EMAIL POLICY

1. Introduction

Corporate email system is an important communication service provided by the Organization to the Users for carrying out day to day business related tasks. Improper use of corporate email system by Users can lead to unauthorized information disclosure and could bring the Organization to disrepute

2. Objective

This document has been prepared to ensure that the corporate email system is used by the Users of the Organization in accordance with the accepted norms associated with the usage of mailing system in a corporate environment. Any information contained in an electronic record which is printed on a paper, stored, recorded or copied in optical or magnetic media produced by a computer is admissible as evidence in a court of law and therefore it is imperative that the usage of corporate email system is in accordance with the IT Policies

3. Responsibilities

(a) Users are responsible for adherence to the policy guidelines and reporting violation or misuse of E-Mail Systems

(b) IT Domain Specific Administrators must comply with this policy, follow its guidelines, and adhere to the same

(c) IT Domain Specific Managers are responsible for supervising the IT administrators towards adherence to the policy

(d) Head of Departments and Human Resources Departments are responsible for approving user requests in relation to email related activities

(e) Human Resource Department is responsible for requesting and validating creation, renaming, store & forward and deletion of E-Mail IDs

4. Policy Statements

a. **Usage Policy**

All Users shall :

i. Use the corporate email system for official and business use only. Occasional and reasonable use of corporate email system for personal purposes is allowed

ii. Treat email messages and files as confidential information

iii. Not use corporate mail system in any way which is disruptive, offensive to others, or harmful to morale

iv. Not transfer or transmit sexually explicit images, messages, and cartoons or any ethnic slurs, racial comments, off-color jokes, or anything that may be construed as harassment or showing disrespect for others

v. Use corporate email system as a business communication tool (which is admissible as evidence in a court of law) and use the same in a responsible, effective and lawful manner

vi. Not use the corporate email system to solicit third persons for commercial ventures, religious or political causes, outside organizations, or other non-business matters

vii. Not use their official email ID while subscribing or signing up for services like Facebook, Twitter, any such 3rd party service

viii. Immediately report any suspected spurious emails to the IT Department since emails can carry viruses and/or other security risks

ix. Not use corporate email IDs as the secondary email ID for any third party email systems

x. Not forward any email from the Organization's email domain to a third party email systems until and unless such forwarding is required for legitimate business purposes.

xi. Disclose information or messages from the corporate mail system only to authorized recipients for business purposes

xii. Refrain from entering personal details or conversation into the corporate mail system as Users do not have a privacy right in any matter created on, received through or sent from the corporate email system

xiii. Follow email etiquettes and maintain official decorum in business communication

b. **Policy**

i. Certain legal risks while using the corporate email system are highlighted below:

- An email message may go to persons other than the intended recipient. If it contains confidential or commercially sensitive information then this could be damaging to the Organization and be considered leakage of confidential information

- Forwarding letters, files and other documents attached to emails of which the person is not an intended recipient, without permission from the sender, may be considered copyright infringement.

- User and/or the Organization shall be open to legal risk if the User sends emails with any libelous, defamatory, offensive, racist or obscene remarks

- An email message may legally bind the Organization contractually in certain instances

- User and/or the Organization shall be open to legal risk if a User sends an attachment that contains a virus. By opening emails and attachments from an unknown sender, a user may introduce a virus into the information systems of the organization

ii. Email should always be regarded as potentially public information, which carry a heightened risk of legal liability for the sender, the recipient and the organizations for which they work

iii. Users should notify Human Resources Department or the IT Department upon learning of violations of this policy

iv. All Users are responsible for ensuring that the corporate mail system is used properly and in accordance with this policy. Any questions about this policy should be directed to the Human Resources Department

v. Even if Users have been provided password for the corporate email system, it is impossible to assure the confidentiality of any message created on, received through or sent from the corporate email system. However the Organization will implement adequate security systems of the corporate email system to safeguard its mailing platform

vi. The Company expressly reserves the right to monitor, access, retrieve, read any communication that is created on, received through or sent in the corporate email system to assure compliance with the IT Policies or any other policy of the Organization

c. **Operational Policy for IT team**

The IT Department shall carry out the following:

i. Email System Security

- Secure mail gateway shall be configured to facilitate exchange of mails to and from external mail systems over internet
- Firewall shall be configured to ensure that only required ports are opened to/from internet
- Gateway security solutions shall be installed for email security such that all incoming and outgoing mails are scanned for viruses
- The Organization reserves the right to block any emails in the corporate email system
- Adequate solutions shall be implemented to protect the Users from SPAM mail. Anti-SPAM software shall have the capability to reject emails sent from known open relay servers

ii. ID creation, deletion & usage : The IT Department shall carry out the following:

- Creation of mail ID for Users shall be done on receiving a formal request from HRD for email ID creation. The details provided by HRD shall be used in configuring User's email address and identification details: -
- User shall be included in the respective mailing lists/groups as advised by the HRD
- Group/generic email IDs should be created only after an authorization from HRD and respective Head of Departments (HoDs)
- Access to Group IDs should be restricted to Users as approved by the group owner
- Temporary email IDs can be created as per business requirement after approval of HoD and HRD

- The ID of the User would continue to be active and functional unless deleted on resignation, termination from employment or discretion of the Organization

- Upon deletion of an email ID, the mailbox should be handed over to either HRD or the respective HoD

- A group email ID shall be configured to receive all emails of a User who has left the organization for a period of 30 days to ensure business continuity. The members of the group ID shall be intimated the same by the HRD. The member can be, either:

    - A new staff who has been recruited to carry out the same role

    - An existing staff from the same department

- Passwords for email IDs should be configured and managed in accordance to the Password Management Policy

iii. Configuration of email IDs on multiple workstations should not be done unless approved by respective HoD

iv. Access to email IDs other than self or sharing of email IDs is not allowed unless approved by respective HoD and HRD

v. Email account should be created based on appropriate naming standard.

vi. Different naming standard should be used for Users and generic ids:

- For Users: <First Name>DOT<Last Name>@ilfsindia.com

- For Group/Generic email IDs the email IDs are created on a case by case basis.

- In case an existing email IDs is present with the same first and last name then HRD approval is required to create an email ID in an alternate name

vii. Internet mail (incoming): The mail ID created for Users would be automatically assigned an internet email ID and would be enabled for sending and receiving internet mail on the corporate email system

viii. Access to corporate email system:

- Access to the corporate email system can be provided to Users for the following services:

    - Web mail
    - Mobile Phone Access - Access to be granted on a single device only
    - Blackberry Access
    - Same Time Chat

- Access to the above services will be provided to Users on a need to have basis and with prior approval of the HRD and respective HoDs

- Users who have been provided with email access on their Mobile Phones must ensure that the Organization's data stored thereon cannot be accessed by an unauthorized person in the event the device is left unattended or has been misplaced / stolen

- To prevent unauthorized access to Organization's data residing on Mobile Phones, the Users should adhere to the following guidelines:

    - Enable a startup / device lock password

    - Set a complex password that has some special characters

    - Inform the IT Department at the earliest to carry out a device wipe action on the phone as a safety measure against misuse of data on the device

    - Not share the password with anyone and must be changed at regular intervals to keep the device password secure

- Users should also take periodic backups of the phone to safeguard the data stored on the device. In the event the phone is wiped when reported, User can use the backup to restore the data stored on the device

ix. Mail Journaling:

- Mail Journaling should be done on the corporate mailing server to ensure easy retrieval in case of any user requirement

- The mail journals should be backed up regularly as per the backup policy

- The latest mail journal will be retained on the server containing the mails for the last 15 days, after which they would be archived

x. Cross Domain certification policy:

- The mailing system of the Organization is connected to the corporate email system of its group companies to facilitate intra-company mail messaging

- The exchange of mail across these systems is controlled by cross domain certification

- Cross domains certification will be configured/deleted based on approval from Head – IT Infrastructure

xi. Maintenance:

- Address book of the corporate email system including generic/group IDs will be reviewed and updated on a monthly basis to ensure only valid Users and groups are listed in the address book

- Review of individual and generic email ID will be done with the HR while that of Group IDs will be done with the group owners

- IDs of Users who have ceased to work with the Organization will be deleted from the address book

xii. Disclaimer for external mails: All external mails would carry a standard system generated disclaimer as a footer of each message

xiii. Email Signature:

- It is recommended to the Users to include email signature in all mail communications

- The email signature could include the following:

    - Name
    - Designation
    - Organization Name
    - Contact Details

xiv. Mailbox quota:

- Every User on the corporate email system will be provided a disk quota of 300 MB. Users exceeding the disk quota will be sent a reminder mail informing them that they have exceeded the mailbox quota
- Email attachments size shall be restricted to 20 MB as per best practices and industry standards
- For attachment size larger than 20 MB, Users should use Secure File Transfer Facility provided by the Organization

xv. Access to User mailbox

- Access to another User's mailbox must be approved by HoD and HRD
- Access to existing User mailbox must be approved by HoD / CEO of the Company and by Group HR Head
- Access to the mailbox of top / senior management personnel will be given to their secretaries, based on prior approval of the concerned User
- Other than the above, access to User's mailbox by other Users is strictly prohibited and such access will not be provided by IT Department
- However, in special cases, where Head of Department requires the backup of the mailbox of his or her team members, the same would be provided, subject to approval received from the respective company's MD / CEO and Group HR Head

xvi. Definitions

(c) IT Domain Specific Administrator: IT administrators like Network Administrator, System Administrator, Database Administrator, etc.

(d) IT Domain Specific Manager: Team leads of the respective domains like Network Administration, IT Security Administration, System Administration, Backup Administration, etc.

(e) SPAM: Electronic junk mail or the abuse of electronic messaging systems to indiscriminately send unsolicited bulk messages.

(f) Attachment: Files which are attached to an email

(g) Disclaimer: Note stating organizations point of view towards communication over mail

(h) Generic ID: IDs which are not attached to the name of an individual but are related to a project or a group

(i) Journaling: Process of storing email for long term review and restoration

D. ANTI – VIRUS POLICY

1. Introduction

Malicious software or codes such as viruses, worms, trojan horses, spy ware, root-kits or any similar software programs ("**Malware**") represents a significant threat to the performance and impacts the security levels of the Organization's IT Systems. Thus, it is important for the Organization to safeguard the same from such attacks

2. Objective

This policy is designed to protect the Organization's IT Systems against intrusion by Malware

3. Responsibilities

(a) Users shall be responsible to ensure that there is no interference with the antivirus configuration and actions performed by the antivirus agent on their PCs. Users shall immediately report any suspected incident regarding any Malware to the IT Department

(b) IT Security Administrators shall be responsible for

i. installation and configuration of antivirus software / solution on each User's PC,

ii. handling incidents arising out of Malwares; and

iii. maintaining the antivirus software / solution on an ongoing basis

4. Policy Statements

(a) Antivirus Software

i. Antivirus software shall provide continuous protection against Malware on PCs of the Organization

ii. Features of the antivirus software shall be reviewed by the IT Department on an annual basis

iii. Adequate licenses shall be purchased by the IT Department to ensure protection of all IT Systems

(b) Installation & Configuration

The IT Department shall:

i. Install anti-virus software in all PCs and IT Systems

ii. Configure anti-virus software to minimize the outbreak of any Malwares.

iii. Configure anti-virus software to scan all internet and email traffic.

iv. Configure anti-virus software to do a real time scan of all the files on the PCs when such files are accessed, copied or moved to ensure that all security risks are detected before they get activated

v. Ensure that anti-virus software is password protected to prevent Users from uninstalling the software

vi. Configure anti-virus software to scan the PCs at least once in a week which can be either when the PC boots up or during non-peak usage hours which is controlled by the IT Department

vii. Manage all anti-virus services, real-time scan, scheduled scans, scheduled/automatic updates in User's PC

viii. Ensure antivirus signature updates be applied to the endpoints at least on a daily basis

ix. Ensure that infected files are quarantined if they cannot be cleaned and then deleted (after notifying the same to the User)

x. Ensure that all files are scanned for Malware before moving or copying them

xi. Upgrade the anti-virus software from time to time

The Users shall not:

i. Uninstall or change the configuration of the anti-virus software

ii. Interrupt the working of the anti-virus software or while the software is scanning documents or files on the PCs

(c) E-Mail Antivirus Policy

IT Department shall ensure that:

i. Adequate anti-virus software to scan incoming e-mails, including attachments which scanning be implemented at gateway and on server

ii. An email, if cannot be cleaned is deleted, if Malware is found, after giving notice to the User

iii. Where the file pattern is related to a suspected virus, the email shall be delivered with suspected spam appended to its subject line

iv. If the attachment or mail cannot be scanned for any reason, the e-mail must be delivered by appending the subject line with information that the e-mail was not scanned

(d) Reporting

i. Reports from all PCs shall be reviewed on a weekly basis by the IT Department which shall cover status of anti-virus agents, anti-virus updates and Malware detected/ cleaned/quarantined. The IT Department will continue to implement system configurations to mitigate such risks

ii. Any incidents related to non-functioning of the anti-virus software or a Malware outbreak shall be reported by any User to the IT Department taking remedial actions

5. Definitions

(a) **Antivirus Software:** A program that monitors a computer or network to identify all major types of Malware and prevent or contain Malware incidents

(b) **Virus:** A computer program that can copy itself and infect a computer without permission or knowledge of the user. A virus might corrupt or delete data on a computer, use email programs to spread itself to other computers, or even erase everything on a hard disk

E PASSWORD MANAGEMENT POLICY

1. Introduction

A password is a convenient and easy method of authentication for Users accessing the IT Systems of the Organization. This method of authentication is easily implemented, but may be subject to a number of security threats if not properly administered. A poorly chosen password may compromise the Organization's IT Systems

2. Objective

The objective of the policy is to establish guidelines for password management and usage practices for secure use

3. Responsibilities

(a) All Users shall follow the guidelines provided below while understanding the ramifications of activities involving his/her Authentication Credentials

(b) The IT Department shall maintain the integrity of passwords used for administrative resources and follow its guidelines as stated herein below

4. Policy Statements

All Users shall:

(a) Use only the unique authentication credentials issued by the IT Department which consists of at least a login-ID and password for validation of the User's identity when accessing or logging into the IT Systems

(b) Keep the login id and password confidential and not disclosure or it to any other person including such User's supervisors, personal assistants, human resources department and/or IT Department

(c) Seek approval from the human resources department and the Head of their department for sharing the password for a specific requirement

(d) Ensure that the passwords do not contain personal information about the User (including but not limited to name or part thereof, birth date, social security number or part thereof, license number, or staff number)

(e) Not use passwords in any Automated Logon Process (like 'Save password' option on internet browsers) since this could be misused if PC is accessed by an unauthorized person

(f) Not store passwords on folders in the PC

(g) Be accountable for all activities performed using their Authentication Credentials unless the PC is hacked

(h) Poor password complexity allows an intruder or hacker to predict or guess passwords and gain unauthorized access to the Organization's IT Systems hence password complexity is needed to make the passwords difficult to guess or retrieve

(i) Minimum length of passwords for Users shall be 6 characters

(j) The password shall not contain the User's account name or full name that exceed two consecutive characters

(k) The password shall contain uppercase case characters, lower case characters, numeric digits, special characters, like @, #, &, etc.

(l) Contact the IT Department in case of any observation of suspicious activity regarding their Authentication Credentials

(m) Change their password

- when prompted by the IT Systems; or
- immediately after their password or the IT Systems that they access using their password has been, or is suspected of being compromised

The IT Department shall:

(a) ensure that all IT Assets including workstations, PCs, software applications, operating systems, network devices and databases are protected using passwords

(b) issue unique authentication credentials to all Users. In the first login to IT Systems, the User shall be provided with temporary password which shall have to be mandatorily changed. Authentication credentials for other applications will be communicated to Users through secure and accepted communication channels like corporate email

(c) Issue generic credentials, as and when required for specific requirements, after seeking approval from HoD and Head – IT Infrastructure

(d) Ensure that no passwords of Users shall be changed or shared (without the authorization of such User) with any third person

(e) Ensure that the IT Systems mask, suppress, or obscure the display of passwords to prevent unauthorized persons from observing the same

(f) Ensure that authentication systems store passwords in an encrypted format

(g) Ensure accountability and security vendor default authentication credentials be changed, disabled or removed

(h) Ensure that the password guidelines as stated herein are followed. In addition to above, the Root / Super User / Administrators shall ensure that passwords are a minimum of 8 characters

(i) Ensure that each User's password history is maintained for 3 previous passwords

(j) Ensure that the IT Systems automatically directs the Users to change their password at least every 90 days. If the same cannot be automated or configured for specific business requirements, shall ensure that Users manually change their passwords at least every 90 days

(k) Reset or unlock User's account or password only on a specific request by such User and no other third person. IT Department shall exercise reasonable caution to identify Users before resetting or unlocking the account or password to avoid misuse

5. Super User / Administrator Passwords

(a) The IT Department shall ensure that the administrative and system passwords be known or accessible to certain IT Administrators in the IT Department on a 'need to know' basis

(b) The IT Administrators who know of the administrative or system password shall ensure that such passwords are stored securely and not shared with any unauthorized person

(c) The IT Administrators shall immediately change the password of their administrative or System account after the password or the administrative resource has been, or is suspected of being, compromised

(d) After any IT Administrators leaves the Organization, the Administrative or System passwords which such Administrator who was of the know, shall be immediately changed

(e) In case of an administrative or system account where password change is not possible, additional security measures must be implemented to log and identify access attempts.

6. Definitions

(a) **Administrative Resource:** Such as routers, switches, WAN links, firewalls, servers, Internet connections, administrative-level network operating System Accounts, Active Directory and Directory Enterprise Administrative level accounts and any other IT resource.

(b) **Authentication:** A security procedure designed to verify that the authorization credentials entered by a User to gain access to a network or IT Systems are valid.

(c) **Automated Logon Process:** Storing Authentication Credentials in a registry entry, macro, or function to automatically authenticate a User to a System without User intervention.

(d) **Information System:** An information processing equipment that is recognized as "valuable'' to the Organization

(e) **System:** Software, hardware and interface components that work together to perform a set of business functions.

(f) **System Account:** A specialized user account which have elevated privileges on the specific System running the application for which they are used.

IV COMPETITION :

IL&FS believes in vigorous yet fair competition in accordance with the following principles :

1. IL&FS will not participate in any price cartel in any of its businesses that have potential to negatively affect free and fair competition

2. IL&FS will not participate in any monopolistic trade practices

V Environmental Commitment :

All staff, in their business activities, should endeavour to adhere to the environmental aspects to the extent feasible as mentioned in Section 2.19 of the Environmental and Social Policy Framework (ESPF) Volume I, which is available on the IL&FS website

VI Commitment to Stakeholders :

IL&FS recognizes the staff as one of its many stakeholders. The company shall strive to safeguard the interests of all its staff. The Company is committed to transparent disclosure of and access to information that impacts the staff

VII **Ethical conduct:**

IL&FS shall encourage and support its external stakeholders such as clients, suppliers, contractors and business partners to adopt responsible business policies and promote ethical conduct

VIII **Voluntary Employment**

IL&FS does not use any forced labour, child labour, bonded labour or any other forms of involuntary labour

IX **Work Environment**

The Company strives to provide a safe, healthy, clean and ergonomic working environment for its staff. The safety and security of the staff in the workplace is a primary concern of the Company. IL&FS respects and supports the dignity, well-being and human rights of all the staff

X **Work-Life Balance**

1. IL&FS encourages all staff to maintain a work life balance by providing facilities such as late coming twice a month, work from home facility with the consent of the supervisor

2. IL&FS provides a fully equipped gym at BKC, Mumbai for the staff at special subsidized rates. The gym offers an assorted selection of equipment that meets the needs of the staff to keep them fit and healthy. It also offers yoga and zumba dance classes

3. At BKC, Mumbai, a bus facility is available from the nearest railway station to the office (to and fro) for all staff. An additional drop at 6:45 pm is also available for staff who work late and miss the 5:45 pm drop to the station. Similar bus facility is also available for the staff based at Gurgaon office

XI Public Policy Advocacy

1. Definitions

The definitions of some of the key terms used in this Policy are given below

(a) **Public Policy: Public policy** consists of principles that guide actions of the government, consistent with law and institutional customs

(b) **Industry Representation:** Participation in discussion or debate on public policy on behalf of an industry sector through industry association or consultation committees formed by the government

(c) **Staff:** includes permanent employees, people on contract, interns, trainees, and all individuals working directly for IL&FS, unless otherwise specifically mentioned

(d) **IL&FS Representative:** means any member of the Staff or Agency retained by the Company and nominated by the Competent Authority (Any member of the Group Management Board) to represent the Company on consultative group, working group, advisory committee formed for consultations on public policy

2 Scope

a) The objective of this policy is to set standards of conduct and establish guidelines for actions of representatives of IL&FS in public policy advocacy while ensuring compliance with all the applicable laws, particularly ensuring that the business is conducted with integrity and transparency

b) This policy applies to all the staff of IL&FS representing the company while advocating for changes in public policy through government and industry committees.

c) The Company believes in the conduct of the affairs of its business /in a fair and transparent manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour

d) The Company recognizes its responsibility in contributing to the debate/ discussions on public policies that will affect the stakeholders, which includes industries, community, government, but is not limited to these stakeholders

3 Policy Statement

(a) This Policy is the Company's commitment to participation in advocacy only in a responsible manner

(b) IL&FS Representative shall obtain prior permission from the Competent Authority before agreeing to participate in any consultation on public policy. Details such as host extending invitation, subject matter of public policy intervention, duration of engagement, significance of the public policy and proposed deliberations thereon should be communicated to the Joint MD & CEO, IL&FS through proper channel

(c) IL&FS Representative shall proactively understand the stand of IL&FS on all issues supposed to be discussed in the consultation forum

(d) IL&FS Representative shall prepare minutes of the public policy consultation meetings after every meeting and communicate the same to her/ his immediate supervisor/ CEO or a member of the management board as per significance of the issue

Amendments

The Company may amend or modify this Policy in whole or in part, at any time necessitated due to business needs, in a transparent manner

XII Corporate Volunteering

1. Background

a. Volunteering demonstrates our commitment to our communities, our people and is integral to our role as a responsible business. We view contributing to society as an extension of our business aspirations. We believe volunteering contributes to civic society through active participation in building strong, inclusive and resilient communities. It underlies innovation and social change, brings together and supports the local strengths and assets of communities. This policy is designed to help support all the staff to volunteer and provide a framework of good practice

b. For individuals, volunteering provides an opportunity to be involved in activities reflecting their interests and utilise their skills. These meaningful activities in turn promote a sense of belonging and general wellbeing. Volunteering can also be a way to explore new skills, spot potential career pathways or a way to contribute existing skills for the common good. Volunteering involvement is a two-way relationship, providing an opportunity for organisations to achieve their goals by involving the staff in their volunteering activities and for volunteers to make meaningful use of their time and skills, thus contributing to social and community outcomes

2. Definition

Volunteering is time willingly given by the staff of IL&FS and all its Group Companies and SPVs for the common good and without financial gain

3. Scope

a. All Staff can volunteer for up to 4 days or 32 working hours annually with at least 2 consecutive days of commitment. It is recommended that preference be given to the projects that Social Inclusion Group (SIG) is working on, and thereafter to projects by our registered partner organisations. The list of all our registered partners is available with the SIG team. It will enable us to monitor and record details of contributions made

b. All volunteering must be with the consent of your line manager. Please ensure you obtain approval in advance of any volunteering taking place. The process to securing approval is mentioned in *Annexure 1*

4. Developing People

a. All volunteering can help demonstrate competencies that contribute to self-development and organisation growth. We anticipate that the volunteering projects will enable the staff to demonstrate competencies listed in our Competency Framework stated in *Annexure 2*. We see that the staff will have ample opportunities to demonstrate some overarching competencies like Planning and Organising Skills; Effective Team Playing; Effective Communication and Effective Decision Making

b. It will also serve as a platform for the staff to work on some specific skills that they intend to iron out while working on these projects.

5. Logistics

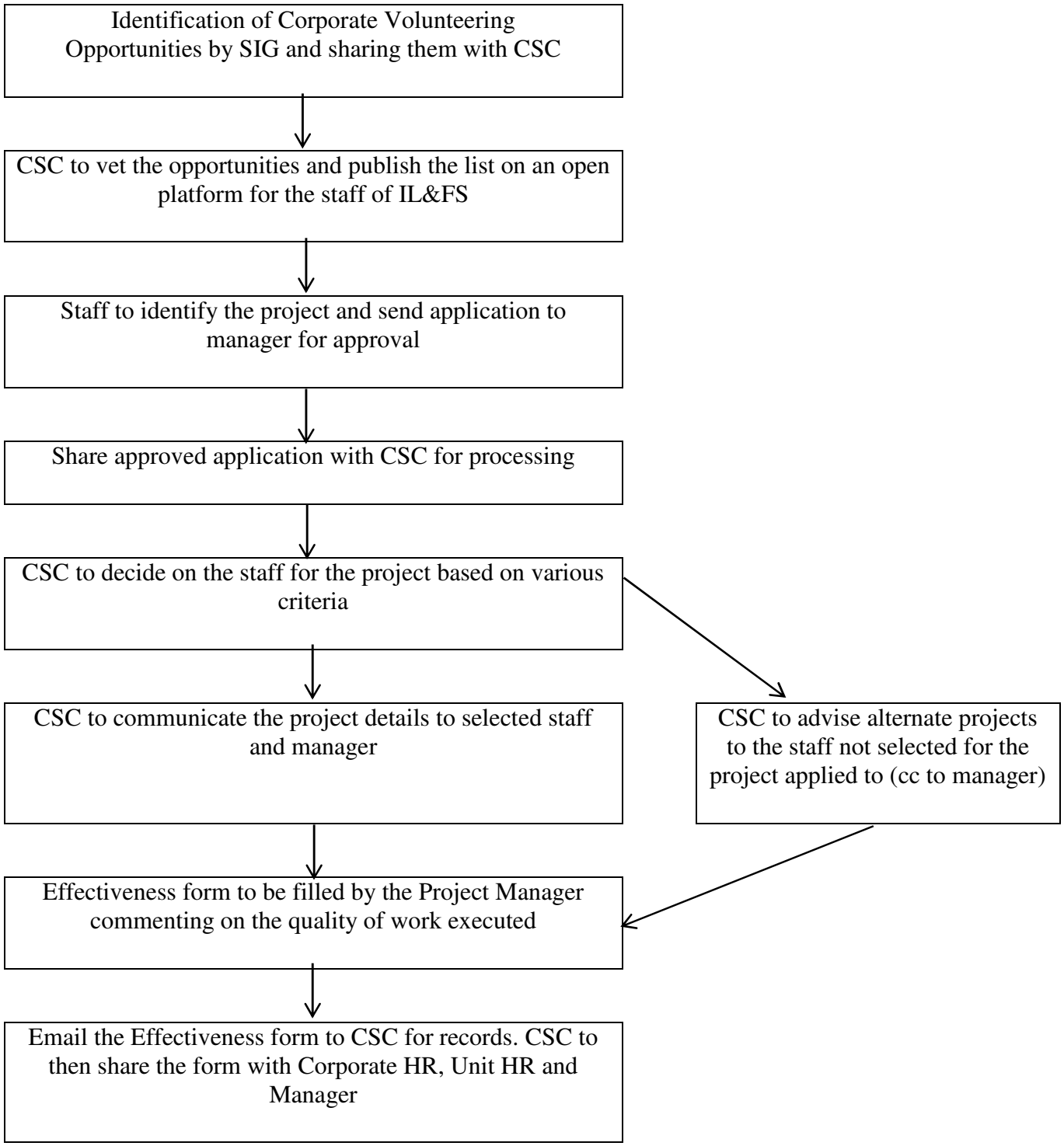
a. All logistics arrangements for transport and stay will be governed by the respective company's prevailing EHB. It is imperative for the staff to seek all necessary approvals while incurring expenses for travel and food.

b. It is recommended that the staff first opt to volunteer with Social Inclusion Group (SIG) on CSR projects with IL&FS Group companies. If a suitable project is not available with the SIG team then the concerned staff will be requested to volunteer with one of the partner organisations of SIG. Such volunteering should be undertaken in consultation with SIG.

c. The location of volunteering should be within a reasonable distance from place of work to ensure optimal utilization of time available.

APPROVAL PROCESS

Annexure 1



Annexure 2

IL&FS Competencies Framework

Competency		CEO & CE	% Wtg.	COO & SVP	% Wtg.	VP & AVP	% Wtg.	SM & Mgr.	% Wtg.
1	Planning and Organising Skills	-	-	5	10%	4	10%	3	15%
2	Results/Achievement Orientation	5	10%	4	10%	3	15%	2	15%
3	Effective Team Playing	-	-	-	-	4	10%	3	15%
4	Effective Communication	-	-	-	-	5	10%	4	15%
5	Organisation Commitment	-	-	5	10%	4	10%	3	10%
6	Strategic Orientation	5	10%	4	10%	-	-	-	-
7	Business / Commercial Acumen	-	-	-	-	5	15%	4	10%
8	Ability to Influence and Inspire	5	10%	4	10%	3	15%	2	10%
9	Effective Decision Making	5	10%	4	10%	3	15%	2	10%
10	Champions Change	5	10%	4	10%	-	-	-	-
11	Intra Group Coordination	5	50%	4	30%	-	-	-	-