

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

We value every employee and are committed to protect the dignity and respect of each employee. We have 'zero tolerance' for sexual harassment and any act of sexual harassment will invite serious disciplinary action.

This policy aims to inform the employees about what conduct constitutes sexual harassment and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such misconduct.

Upholding a healthy and congenial working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment is an integral part of the culture of the Company.

1. APPLICABILITY

This policy is applicable to all employees of the Company. References in this policy to "Employee" shall include regular employees, directors, consultants, retainers, contractors, third party staff etc. at the registered office / place of business as well as at the branch office, if any.

2. POLICY COVERAGE

'Sexual Harassment' is any unwelcome sexually determined behavior (whether directly or by implication), such as:

- Physical contact and advances
- A demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action.
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature whether by words, gestures or actions.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

3. INTERNAL COMMITTEE

An Internal Committee has been constituted to consider and redress complaints of Sexual Harassment. The structure of the Committee is as below :

- i. Chairperson – Senior level female employee
- ii. Three Members – internal employee of which atleast two will be female
- iii. External Committee Member – Advocate / Social worker associated with the cause of women and children

4. COMPLAINT PROCESS

- I. Any employee who feels being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Internal Committee in writing with his / her signature within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident.
- II. In the event where the victim has approached/communicated to anybody else other than the Internal Committee, then that person is required to inform only to the committee immediately and no one else without any delay. He or she should also ensure that confidentiality of the incident/victim is maintained and not disclosed to anybody else.
- III. The Internal Committee will hold a meeting with the Complainant within a week of the receipt of the complaint. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- IV. The Internal Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- V. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not constitute an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- VI. In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Internal Committee, is deliberately false or frivolous would be viewed very seriously.

The Internal Committee shall be governed by such rules as may be framed by Supreme Court

Orders from time to time and by any other legislation that may be enacted on this subject from time to time.

Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are leveled, We are committed to maintain confidentiality in relation to such complaints and the resultant Enquiry.

5. PENALTY CLAUSE:

If the complaint is found to be true, the Employer will initiate any/all of the below mentioned actions:

- a) Warning letter
- b) Transfer of services
- c) Suspension/Termination of employment

6. AMENDMENT

Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable laws. The Board reserves the right to amend or modify this Code in whole or in part.