



## SEXUAL & NON- SEXUAL HARASSMENT POLICY

### POLICY ON WORKPLACE DISCRIMINATION AND HARASSMENT

This policy is to provide a workplace free of all forms of unlawful discrimination, including sexual harassment and harassment on the basis of race, colour, religion, national origin, sex, age, disability etc. All such harassment is illegal and strictly prohibited by the Company.

#### PURPOSE AND SCOPE

To state the Company's firm commitment to provide protection against sexual harassment or women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

Under the act the term Sexual Harassment includes any one or more of the following unwelcome sexually determined act or (whether directory or implication), namely.

- Physical contact & advances; or
- A demand or request for sexual favours; or
- Making sexually coloured remarks
- Verbal Conduct such as making derogatory comments, slurs or epithets of a sexual nature; or
- Sexually graphic or suggestive comments about an individual's dress or body; or
- Sexually degrading words to describe an individual; or
- Implied or explicit promise/threat to female worker related to her employment status etc.

#### REPORTING PROCEDURE

If an employee believes that he or she has been subjected to sexual harassment, unwanted sexual attention or other forms of prohibited harassment, he or she should:

- 1) if comfortable doing so, make his or her unease and/or disapproval directly and immediately known to the individual(s) creating the problem;
- 2) Report the incident as soon as possible, either verbally or in writing, to his or her immediate Reporting Officer or to "Internal Complaints Committee" (ICC).

3) No employee will be discharged or retaliated against in any manner because of registering any such complaint. Supervisors must ensure that alleged discrimination, harassment, or retaliation is reported to the Human Resources Department (including any complaints they may receive from employees in other departments.)

4) Complaint in 3 months of the incidence.

## INVESTIGATION:

A. All allegations of discrimination, sexual and other prohibited harassment or retaliation will be investigated and addressed promptly, impartially and in as confidential a manner as possible.

B. An Internal Complaints Committee (ICC) will be formed for handling complaints on sexual harassment which will comprise of:

- Mr Mahesh Jain
- Mr Stephen Kingsley
- Head - HR
- CFO

## DISCIPLINE:

A. If the complaint is found to be false with malicious intent, the complainant can be penalized accordingly (termination from employment, financial penalty, written apology etc).

B. Any employee who is found to have engaged in acts of discrimination, sexual or other prohibited harassment or retaliation in violation of this policy will be disciplined appropriately, up to the including discharge, depending on the circumstances. When discrimination, sexual or other prohibited harassment or retaliation has been found, appropriate remedial action will be applied in accordance with Company policy.

No monetary settlement consideration.