PREVENTION OF SEXUAL HARASSMENT POLICY

1. Introduction –

This policy "Prevention of Sexual Harassment Policy" has been framed in reference with the requirement of "Sexual Harassment of Workmen at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter referred to be as "the Act"). Accordingly, this Policy covers all the important aspects of the Act and rules framed thereunder. However, for any clarification, the respective provisions of the Act and rules shall prevail over this Policy.

2. Objective –

Our Company is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of every employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

3. Scope –

This Policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual Harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes:

i. All offices or other premises where the Company's business is conducted in the ordinary course.
ii. All company-related activities performed at any other site away from the Company's premises.
iii. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

4. Definition of Sexual Harassment –

According to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-

- physical contact and advances; or
- a demand or request for sexual favour; or
- making sexually coloured remarks; or
- showing pornography; or
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The Sexual harassment is ***"an unacceptable conduct of a sexual nature, or other conduct based on sex abuse affecting the dignity of men or women at work"***. Sexual harassment will generally be unwanted, unreasonable or offensive or it may be a combination of all three. It may cause the employee who is being harassed to feel threatened or humiliated. It may interfere with the employee's job performance, undermine job security or create a threatening or intimidating working environment. Although, the word "harassment" has connotations of repeated conduct, an employee can be harassed by a single act. Sexual harassment can consist of several different types of behavior, some of which are more obvious than others. This list is not exhaustive but, for example

- Sexual harassment can take the form of gestures or leering,
- Sending letters,
- Gifts or offensive publications or the use of pin-ups.
- Unwanted jokes, gestures, offensive words on clothing, and unwelcome comments and repartee.
- Touching and any other bodily contact such as scratching or patting a coworker's back, grabbing an employee around the waist, or interfering with an employee's ability to move.
- Repeated requests for dates that are turned down or unwanted flirting.
- Transmitting or posting emails or pictures of a sexual or other harassment-related nature.
- Displaying sexually suggestive objects, pictures, or posters.
- Playing sexually suggestive music.

Alternatively, sexual harassment may consist of spoken comments, including unwanted propositions, jokes of a sexual nature, questions or comments of a sexual nature or the suggestion that an employee's career can be

advanced by bestowing sexual favors (or alternatively that an employee's career will be damaged if they do not accede to sexual requests). A third sort of sexual harassment involves physical contact including "accidental" contact, or deliberate patting, fondling or groping.

5. Internal Complaints Committee:

The Company has constituted an Internal Complaints Committee ("ICC") in accordance with the Section 4 of the Act. The Committee is constituted at all administrative units or offices for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The constitution of ICC has been approved by the Board of Directors in their meeting held on December 12, 2020. Following are the members of the committee:

Name	***Role***
Ms. Priti Jadav	Presiding Officer
Mr. Roshan Rawal	Member
Mr. Mudit Agrawal	Member

At the time of inquiry, Minimum 3 members including Presiding Officer shall be present. The group shall include the Presiding Officer and at least three members, one-half of whom shall be women.

6. Redressal Process -

a) Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 3 Months of occurrence of incident. Internal Complaint Committee may extend the time limit for a reasonable cause.
b) Complaint shall be submitted in six copies along with supporting documents and the names and address of witnesses.
c) If complaint cannot be made in writing Committee shall provide reasonable assistance to employee for making complaint in writing.
d) If the aggrieved employee is unable to make complaint then any of her legal heir may make a complaint on his/ her behalf.
e) The committee shall send one copy of complaint to the respondent within a period of 7 days and respondent shall file his reply within a period of 10 days.
f) The committee at the request of aggrieved employee shall take the steps to settle the case through conciliation without involving any monetary settlement as a basis of conciliation and where the settlement has been arrived, no inquiry shall be conducted.
g) In case, respondent is an employee, the committee shall, proceed to make an inquiry in accordance with the provisions of service rules applicable to the respondent or other prescribed rules and in case of domestic worker, the local committee shall forward the complaint to the police within 7 (Seven) days for registering the case under Indian Penal Code, 1860, except for those cases which has been arrived for settlement as mentioned in point (f) above.
h) The inquiry shall be completed within a period of 90 days.
i) The committee shall provide a report of findings to the employer within 10 days of completion of inquiry and also to the concerned parties and opportunity of being heard shall also be given to them.
j) If allegation against the respondent has been proved, the committee shall recommend to the employer:-

- to take adequate action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent;
- to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate.

k) In case, the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management but a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.
l) If the Complainant was aggrieved from the recommendation made by Committee to employer then he/she may prefer appeal to the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946.

m) The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
n) The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
o) At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his/ her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
p) 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.
q) In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof in writing.

7. Reporting as per the Section 22 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder

a) The Internal Committee shall in each calendar year prepare an annual report and submit the same to the employer which shall have following details included in its annual report:-
- number of complaints filed during the financial year;
- number of complaints disposed of during the financial year;
- number of complaints pending for more than 90 days;
- number of workshop or awareness programme against sexual harassment carried out; and
- nature of action taken by the employer.

8. Reporting As Per Securities and Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations, 2015

The following disclosure shall be made in corporate governance report forming part of annual report in respect to sexual harassment:-
- number of complaints filed during the financial year
- number of complaints disposed of during the financial year
- number of complaints pending as on end of the financial year.

9. Enquiry Process -

a) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
b) The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him/ her an opportunity to submit a written explanation if he/ she so desires within 7 days of receipt of the same.
c) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
d) If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
e) If the Complainant desires to tender any documents by way of evidence before the Committee, she/ he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee she/ he shall supply original copies of such documents. Both shall affix her/ her signature on the respective documents to certify these to be original copies.
f) The Committee shall call upon all witnesses mentioned by both the parties.
g) The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
h) The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the HR . The report of the committee shall

be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

i) The HR will direct appropriate action in accordance with the recommendation proposed by the Committee.

j) The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

10. Other Points to be considered –

a) The Committee may recommend to the VP-HR action which may include transfer or any of the other appropriate disciplinary action.
b) The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
c) Where sexual harassment occurs as a result of an act or omission by any third party or outsider, TPC shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
d) The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to VP- HR.
e) In case, the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

11. Confidentiality –

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

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

The contents of complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner.

12. Access to Reports And Documents –

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

13. Amendment to the Policy –

The Board of Directors on its own and/ or as per the recommendations of the Internal Complaint Committee may amend this Policy, as and when required. In case of any recommendation(s), clarification(s), circular(s), etc. issued by the relevant authorities, not being consistent with the provisions of this Policy, which are extracted from applicable provisions of the Act, Companies Act, 2013, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or applicable provision of any other acts or rules, to the extent it may be applicable to our Company, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc. However, to bring the effects of such amendments(s), clarification(s), circular(s), etc. Committee may recommend such changes in this Policy to the Board of Directors for their approval in the meeting of the Board of Directors.

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