

VINAYAK VANIJYA LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN

1.0 POLICY

1.1 The Company is an equal employment opportunity company and is committed to create a healthy working environment that enables employees to work without fear of prejudice, gender biasness and harassment, free workplace to all employees without regard to race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving an employee or employees is a great offence and is therefore punishable.

1.2 The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment. This policy takes complete cognizance of the latest legislation by the Government of India "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its rules notification published on 9th December 2013. This Act is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

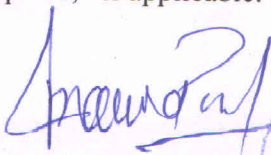

1.3 At the Company, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to:

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
- Refrain from creating hostile atmosphere at workplace via sexual harassment

Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.

2.0 SCOPE

2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.





2.2 Sexual harassment would mean and include any of the following but not limited to:

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
- Physical contact and advances;
- Demand or request for sexual favours;
- Sexually coloured remarks, including but not limited to vulgar indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.
- Showing pornography or the likes
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- Physical contact and advances such as touching, stalking, sounds which have explicit and or implicit sexual connotation/overtones, molestation
- Display of pictures, signs etc. with sexual nature/ connotation! overtones in the work area and work related areas
- Verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature
- Teasing, Voyeurism, innuendos and taunts, physical confinement and or touching against one's will and likely to intrude upon one's privacy.

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

- Implied or explicit promise of preferential treatment in the employment
- Implied or explicit threat or detrimental treatment in the employment
- Implied or explicit threat about the present or future employment status
- Interference with the work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety.



An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

2.3 Definitions:

Aggrieved Individual

An Aggrieved Individual, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.

Complainant

A Complainant is any Aggrieved Individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

Employee

An Employee means a person employed with the Company for any work on permanent, deputation, temporary, consultants, part time, 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, 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.

Respondent

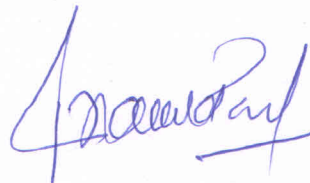
A Respondent means the person against whom the Complainant has made a complaint.

Special Educator

A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

Workplace

- Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company.
- Places visited by the Employee arising out of or during the course of employment including official events, transportation, Accommodation provided by the employer for undertaking such journey.



3.0 COMPLAINT REDRESSAL COMMITTEE/ INTERNAL COMPLAINTS COMMITTEE

As per the guidelines given by the Law, Internal Complaints Committees (ICC) have been appointed for the Company.

4.0 REDRESSAL PROCESS

4.1 A Complainant can make, in writing, a complaint of Sexual Harassment to the Internal Complaints Committee (ICC), 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. The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the said period.

4.2 If the Aggrieved Individual is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by:

- his/her relative or friend; or
- his/her co-worker; or
- an officer of the National Commission for Women or State Women's Commission; or
- any person who has knowledge of the incident, with the written consent of the Aggrieved Individual.

If the Aggrieved Individual is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by:

- his/her relative or friend; or
- a special educator; or
- a qualified psychiatrist or psychologist; or
- the guardian or authority under whose care he/she is receiving treatment or care; or
- any person who has knowledge of the incident jointly with the Aggrieved Individual's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care

If the Aggrieved Individual 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 his/her written consent.

If the Aggrieved Individual is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.

[Handwritten Signature]



4.2 The form in which the complaint is required to be made is annexed as Annexure 1 to the Policy. This form will be available with the ICC. However, any written complaint received in any form other than the form prescribed in Annexure 1 shall also be accepted. The complaint can be submitted to the ICC physically. The ICC may, but shall not be bound to, accept oral complaints under this Policy.

4.3 The Complainant shall submit six copies of the complaint along with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses.

4.4 The Committee will maintain a record of the complaints received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

4.5 The Committee will hold a meeting with the Complainant within five days of receipt of the complaint, but not later than a week in any case.

4.6 At the first meeting, the Committee members shall hear the Complainant and record his/her 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 involved and a male officer for male employees, involved shall meet and record the statement.

4.7 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.

4.8 In the event, the complaint does not fall under the purview of Sexual Harassment, then complaint does not mean an offence of Sexual Harassment, and thus the same would be dropped after recording the reasons thereof.

4.9 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

5.0 ENQUIRY PROCESS:

5.1 The Committee shall immediately proceed with the Enquiry and Communicate the same to the Complainant and person against whom Complaint is made.

5.2 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 she/he so desires within 7days of receipt of the same.



5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

5.4 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 that they propose to call.

5.5 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 he/she shall supply original copies of such documents, Both shall affix his/her signature on the respective documents to certify these to be original copies.

5.6 The Committee shall call upon all witnesses mentioned by both the parties,

5.7 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.

5.8 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action within a period of ten days from the date of completion of the inquiry and such report should be made available to the concerned parties. 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.

5.9 Appropriate action will be directed in accordance with the recommendation proposed by the Committee.

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

6.0 OTHER POINTS TO BE CONSIDERED

6.1 The Committee may recommend to action which may include transfer or any of the other appropriate disciplinary action.

6.2 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, management shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.



6.4 The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission.

6.5 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.

6.6 Penal Consequences of Sexual Harassment

In addition to action which the Management may initiate under the Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act 2013, the following liability may arise under the Indian Penal Code.

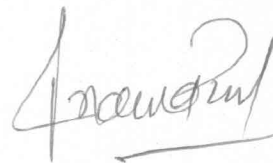
Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

1. Any man who commits:

- (i) Physical contact and advances involving unwelcome and explicit sexual overtures -or
- (ii) a demand or request for sexual favors or
- (iii) Showing pornography against the will of a woman or
- (iv) Making sexually colored remarks

shall be guilty of the offence of sexual harassment.

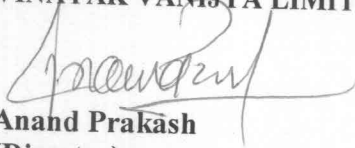
2. Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.
3. Any man who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.
4. In addition, acts of Sexual Harassment may also constitute other offenses under IPC including Section 354 (assault or criminal force to woman with intent to outrage her modesty), Section 354C (Voyeurism), Section 354D (Stalking), Section 375 and 376 (Rape) and Section 509 (word, gesture or act intended to insult the modesty of a woman) of the IPC.



6.7 Awareness:

i. Awareness sessions are periodically organized by the management.

For and on Behalf of the Board of Directors
VINAYAK VANIJYA LIMITED



Anand Prakash
(Director)
DIN: 06918487

