



PREVENTION OF SEXUAL HARASSMENT POLICY

1.0.0 PURPOSE & SCOPE

The Company is committed to provide a safe & healthy work environment that ensures all employees are treated with dignity and respect.

Payal Group has and will be employing female employees in their offices & Group Companies. We need to provide them a safe and secure working environment.

As a responsible employer of female employees, Group Companies are required to make every employee aware of the prevention of Sexual Harassment policy/process and consequences.

2.1.0 APPLICABILITY

2.1.0 The policy will be applicable to all Payal Group of Companies/subsidiaries/ joint ventures located on Delhi, Chennai and Vadodara or any other location in India.

2.1.1 The Policy will be applicable to all staff members/probationers/management trainees/apprentice or any kind of trainees in any location of Payal Group of Companies/subsidiaries/JV companies/regional offices in India.

2.1.2 The workplace includes,

- a) All offices or other premises where company business is concluded
- b) All company related activities performed at any other site away from company's premises
- c) Any social, business or other functions where the conduct or comments may have adverse on the workplace or workplace relations.

3.0.0 PROCEDURE

The following procedure has been laid down.

3.1.0. Policy Guidelines:

- 3.1.1.** Payal Group of companies shall have the highest respect for the honor and dignity of its employees and shall strive to provide them best environment at work place.
- 3.1.2.** The sexual harassment, as defined hereunder (in many manner), of a female employee will be dealt with utmost seriousness and if any person is found guilty, the severe action will be taken against the concern person.
- 3.1.3** At the conclusion of enquiry, if the complaint is judged as frivolous by the Enquiry Office, the complainant will be liable for severe action.

3.2.0. Definition of Sexual Harassment:

As direct by the High Court in the case of M/s Apparel Export Promotion Council V/s A.K. Chopra: "for this purpose, sexual harassment includes unwelcome sexually determined behavior, (whether directly or by implication) as:

- 1) Physically contact and advances
- 2) A demand or request for sexual favor
- 3) Showing pornography
- 4) Sexually colored remarks
- 5) Any other unwelcome physical, verbal and nonverbal conduct of sexual nature.

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances request for sexual favor, or any other verbal or physical conduct of sexual nature. In appropriate conduct could be a joke, a prank or even a compliment also if it is unwelcomed.

3.3.0. RESPONSIBILITIES REGARDING SEXUAL HARRASMENT:

All employees of company have personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce to the maintenance of a work environment free from sexual harassment.

4.1.0 COMPLAINT MACHENISM:

A well-defined complaint mechanism has been defined in the form of "Internal Complaint Committee" for time bond redressal of the complaint made by the victim.

5.1.0. COMPLAINT COMMITTEE:

The company has instituted a complaint committee to address & redressal of sexual harassment complaint (made by victim) in defined time frame.

To start with & till further notice, a complaint committee will comprise of following structure,

- I. Presiding Officer: Woman at Senior Level.
- II. Member 1: Senior employee from Human Resource Department/Personnel Department.
- III. Member 2: A senior employee of the plant/office, where the complaint is originated.
- IV. Member 3: Independent member of NGO or Lawyer

The presiding office reserves the right to nominate more members of appropriate seniority to ensure the equal representation of the gender as that of the complainant or for any valid reason.

The internal complain committee is responsible for,

- I. Investigating every written complaint of sexual harassment.
- II. Taking appropriate remedial action to respond to any substantiated allegations of sexual harassment.
- III. Discouraging and preventing employment related sexual harassment.

6.1.0. PROCEDURE OF RESOLUTION, SETTLEMENT OR PROSECUTION OF ACT OF SEXUAL HARASSMENT:

The company is committed to provide supportive environment to resolve concern on sexual harassment as under:

- I. **Informal Resolution Option:** When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to harasser and request to harasser to behave decently.
If the harassment does not stop or if victim is not comfortable with addressing the harassment directly, the victim can bring their concern in notice of the internal complaint committee for redressal of their grievance. After receiving a written complain, the internal complaint committee will provide advice or extend support as requested and undertake investigation to resolve the grievance.

II. Complaints:

- (1) An employee with a harassment concern, who is not comfortable with the informal resolution of option or has exhausted such options, may make a formal complaint to the presiding officer of the complaint committee constituted by the management. The complaint shall have to be in writing and can be in form of a letter, submitted within three months from the date of incident and in case of series of incident. The complaint committee shall extend the time line for filing the complaint, for reason to be recorded in writing, by a period of three months. Alternatively, an employee can register a complaint by e-mail. The employee to disclose their name, department, location, they are working in, to enable the presiding officer to contact them & take the matter forward.
- (2) The presiding officer of the internal complaint committee will proceed to determine whether the allegations (assuming them to be true only for the purpose this determination) made in the complaint fall under the preview of Sexual Harassment, preferably within 30 days from receipt of the complaint.
- (3) If the presiding officer of the internal complaint committee determines that the allegations constitute an act of sexual harassment, he/she will proceed to further investigation of the allegations with the assistance of the complaint committee.
- (4) Where such conduct on the part of the accused, amounts to a specific offence under the law, the company shall initiate appropriate action in accordance with law by making a complaint to the appropriate authority.
- (5) The internal complaint committee shall conduct such investigation in a timely manner and shall submit a written report containing the findings and recommendation on action to be taken by the appointing authority as soon as practically possible, in any case not later than 90 days from the date of complaint received. The appointing authority along with Head- Human Resources and the President of the company will take decision jointly for corrective actions based on the recommendations of the Internal Complaint Committee and keep the complainant informed of the same.

The corrective action may include the followings,

- (a) Formal Apology Letter
 - (b) Counseling
 - (c) Written warning to the accused & a copy of the same maintained in personal file of employee.
 - (d) Change of work assignment/transfer for either accused or victim.
 - (e) Suspension of the accused.
 - (f) Termination of the accused.
- (6) In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

Process Flow Chart:

