

SWASTIKA INVESTMART LIMITED
Regd. Off.: Flat No.18, 2nd Floor, North Wing, Madhaveswar
Co-operative Housing Society Ltd, Madhav Nagar, 11/12, S.
V. Road, Andheri W, Mumbai – 400058
CIN: L65910MH1992PLC067052

Policy on Prevention of Sexual Harassment at Workplace

(Formulated as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Regulations made there under)

1. PREAMBLE:

SWASTIKA INVESTMART LIMITED ("The Company") believes in providing equal employment opportunity to all and endeavors to create a healthy working environment that can enable its employees to work with dignity and without fear of prejudice, gender biasness and sexual harassment. Sexual harassment, whether it is at the work place or other than work place, is a grave offence and is, therefore, punishable. Therefore, The Company will in no case tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment, whether at the work place or any place other than the work place.

2. SCOPE:

This policy shall be applicable to all categories of employees of the Company, including permanent, temporary, on probation, or on daily wage basis, working at the workplace or at client sites. The Company shall not be tolerating sexual harassment, whether engaged in by other employees, by clients or by suppliers or any other business associates.

In this context, a workplace includes:

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

3. DEFINITION:

Sexual harassment would mean and include any of the following:

- i. Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- ii. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexual jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- iii. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- iv. Act or conduct by a person in authority which creates the hostile environment at workplace or intimidating to a person belonging to the other sex;
- v. Any unwelcome gesture by an employee having sexual overtones.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. It shall be the duty of all employees to reinforce the maintenance of a work environment free from sexual harassment.

5. INTERNAL COMPLAINT REDRESSAL COMMITTEE:

The Company has formulated an Internal Complaint Redressal Committee (ICRC) for redressal of sexual harassment complaints and it shall be the duty of The ICRC to ensure time bound fair treatment of such complaints.

Initially, till further notice, The ICRC will comprise of the following four members:

1. Mrs. Smita Chasker (Presiding Officer)
2. Mrs. Sunita Chourasiya
3. Ms. Deepika Hemrajani
4. Mr. Vivek Deshpande

The ICRC shall be responsible for:

- Investigating every formal written/verbal complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

6. REDRESSAL MECHANISM:

- 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 ICRC in writing with his/her signature within 30 days of occurrence of incident.
- The ICRC shall maintain a register to endorse the complaint received by it and keep the contents confidential.
- The ICRC shall hold a meeting with the Complainant within seven days of the receipt of the complaint, but not later than a week in any case.
- At the first meeting, The ICRC 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.
- Thereafter, the person against whom complaint is made may be called for a deposition before The ICRC and an opportunity will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 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 case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

7. ENQUIRY MECHANISM:

- The ICRC shall immediately proceed with the Enquiry and the same shall be communicated to both, the Complainant and person against whom the complaint has been made.
- The ICRC 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 7 days from communication of Statement of Allegation.

- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- In case any witness has to be called the Complainant or the person against whom complaint is made, they shall communicate in writing to the ICRC the names of witness (es) whom they propose to call.
- The ICRC shall call upon all witnesses mentioned by both the parties.
- The ICRC 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.
- The ICRC shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Chairman & Managing Director. The report of The ICRC shall be treated as an enquiry report on the basis of which an employee who has been found guilty of such allegations can be awarded appropriate punishment straightaway.
- The Chairman & Managing Director will direct appropriate action in accordance with the recommendation proposed by the ICRC.
- The ICRC shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

8. PROTECTION TO COMPLAINANT:

- The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.
- The Company will ensure that the complainant or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

9. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.