

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE OF PIONEER EMBROIDERIES LIMITED

I. COMMITMENT:

Our Company is committed to providing work environment that ensures every women employee is treated with dignity, respect and afforded equitable treatment. The Company is also dedicated at promoting a work environment that is conducive to the professional growth of its 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.

II. SCOPE:

This policy applies to all categories of women employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their 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:

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

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Subjecting a woman to an unwelcoming sexually determined behaviour (whether directly or by implication)

- a) By physical contact and advances; or
- b) A demand or request for sexual favours; or
- c) Making sexually coloured remarks; or
- d) Showing pornography; or
- e) Any other unwelcoming physical, verbal or non-verbal conduct of sexual nature.

Presence or occurrence of circumstance of implied or explicit promise of

- a) Preferential treatment in employment; or
- b) Threat of detrimental treatment in employment; or
- c) Threat about present or future employment; or
- d) Interference with work or creating an intimidating or offensive or hostile work environment; or
- e) Humiliating treatment likely to affect the lady employee's health or safety.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

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

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

V. COMPLAINTS COMMITTEE:

The Company has constituted a formal Internal Complaint Committee (ICC) for redressal of sexual harassment complaint (made by the victim). For ensuring time bound treatment of such complaints to ICC. ICC is responsible for:

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

VI. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the authorized person for redressal of their grievances. The authorized person will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

- An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Internal Complaints Committee constituted by the Company. The complaint shall have to be in writing and can be in form of a letter, preferably within 3 months from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email at companysecretary@pelhakoba.com. The employee is required to disclose their name, department, division and location they are working in, to enable the Chairperson to contact them and take the matter forward.
- In case where woman is unable to make a complaint on the account of her physical or mental incapacity or death or otherwise, her legal heir or such other person may make a complaint.
- The authorized person will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Chairperson will record this finding with reasons and communicate the same to the complainant.

- If the authorized person determines that the allegations constitute an act of sexual harassment, then the ICC may, before initiating an inquiry and at the request of the aggrieved woman, take steps to settle the matter between both parties through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.

- ICC shall proceed enquiry into the complaint on the failure of the conciliation between the parties
- 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 with the appropriate authority.
- ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Chairperson as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint and submit its recommendations & penalty to be imposed within 10 days from the date of the completion of inquiry to the employer. Further, employer shall take action as per ICC recommendations within 60 days of receipt of inquiry report.

Corrective action may include any of the following:

- Formal apology
 - Counseling
 - Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - Change of work assignment / transfer for either the perpetrator or the victim.
 - Suspension or termination of services of the employee found guilty of the offence.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

VII. PENALTY FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE BY COMPLAINANT OR ANY OTHER PERSON:

Penalty for false evidence and forged or misleading documents by witness(s):

Where the ICC arrives at a conclusion, after the enquiry that:

- the allegation against the respondent is malicious; or
- the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false; or
- the aggrieved woman or any other person making the complaint has produced any forged or misleading document; or
- any witness has given false evidence or produced any forged or misleading document

it may recommend to the employer to take any of the following action:

- a written apology/ warning/ reprimand or censure/ withholding of promotion/ withholding of pay rise or increments/ termination the respondent from the service/ undergoing a counseling session/ carrying out community service
- Deduct from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the complainant or to her legal heirs. ICC shall determine compensation:
 - the mental trauma, pain, suffering and emotional distress;
 - the loss in the career opportunity due to the incident;
 - medical expenses for physical or psychiatric treatment;
 - the income and financial status of the respondent;
 - Feasibility of such payment in lump sum or in installments.

VIII. 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.

IX. 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.

X. PROTECTION TO COMPLAINANT / VICTIM:

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 victim 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.

XI. 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.