

**POLICY ON SEXUAL HARASSMENT OF EMPLOYEES AT  
INDUSTRIAL AND PRUDENTIAL INVESTMENT COMPANY LIMITED**

**BACKGROUND**

Industrial and Prudential Investment Company Limited is a listed company (the Company). In accordance with the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements ) Regulations, 2015, it is required to make disclosure in relation to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, in the Annual Report in the Corporate Governance Report, as per Regulation 31 of LODR.

Accordingly, as per LODR and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter “the Act”) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter “the Rules”), the Company has framed this Policy.

The Company’s Policy on Prevention of Sexual Harassment at the Workplace (hereinafter “the Policy”) aims at prohibiting and preventing the commission of acts constituting sexual harassment at the workplace and sets out the procedure for speedy redressal of complaints relating to sexual harassment.

This Policy has been approved by the Board of Directors at its meeting held on 12th August 2022 and the same is available on the website of the Company.

## **POLICY**

1. The Company is an equal opportunity employer and is committed to creating a healthy, safe and secure working environment free of gender bias or prejudice of any kind. It aims to create a harassment free workplace without regard to race, caste, religion, colour, ancestry, marital status, socio-economic status, gender, sexual orientation, age, nationality, ethnic origin or disability.
2. The Company specifically recognises that sexual harassment at the workplace results in violation of the fundamental right to equality under Articles 14 and 15 of the Constitution of India, the right to life and to live with dignity under Article 21 of the Constitution of India, and the right to practice any profession or to carry on any occupation, trade or business under Article 19(1)(g) of the Constitution of India which includes the right to a safe environment, free from sexual harassment. As such, Vidhi does not tolerate any form of sexual harassment and is committed towards taking all necessary steps to ensure that no person employed at or engaged by Vidhi in their course of employment or engagement is subjected to any form of sexual harassment.
3. This Policy applies to sexual harassment at the workplace. While the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter “the Act”) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter “the Rules”) prescribed under the Act apply only to cases where the aggrieved person is a woman, it is made clear that this Policy is not confined to those instances alone; it applies to any case of sexual harassment at Vidhi. However, it is clarified that where the aggrieved person is a woman, this Policy will be applicable, subject to the provisions of the Act and

the Rules. Furthermore, remedy available under this Policy will be in addition to any other remedy, which an aggrieved person may pursue under any other law in force.

4. This Policy applies to the Company as a 'workplace' as defined under the Act. To clarify, 'workplace' means all office premises of the Company as well as any other premises visited or used by any person arising out of or during the course of her employment or engagement with the Company, including any transportation provided by the Company for undertaking such journey. The Company is also fully committed to supporting any person employed at or engaged by Vidhi who faces sexual harassment in the course of her employment or engagement where the person wishes to seek relief from any internal complaints committee of another workplace or a local complaints committee as the case may be.

#### **SCOPE AND EFFECTIVE DATE**

- a. This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- b. Sexual harassment would mean and include any of the following:
  - i) unwelcome sexual advances, requests or demand for sexual favours, 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 sexually coloured remarks, 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 environment at workplace hostile or intimidating to a person belonging to the other sex;
- v) conduct of such an act at workplace or outside in relation to an Employee of the Company, or vice versa during the course of employment; and
- vi) any unwelcome gesture by an employee having sexual overtones

It applies to all the employees who are on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

#### **COMPLAINT REDRESSAL COMMITTEE**

- A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:
  - a. Ms. Devina Swarup, Director
  - b. Mr. Arun K Singhania, CFO
  - c. Mr. Ayan Dutta, Company Secretary
- A quorum of 2 members is required to be present for the proceedings to take place. The quorum shall include the Chairman and another member to be a lady.
- Ms. Devina Swarup shall be the Chairman of the Committee.

## 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 10 days of occurrence of incident.
- B. 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.
- C. 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.
- D. 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.
- E. 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.
- F. 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.
- G. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

## 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 she / he 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 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.
- 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 Compliance officer. 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 Compliance officer 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.

## **OTHER PROVISIONS**

- The Committee may recommend to take action which may include transfer or any of the other appropriate disciplinary action.
- The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Board to be included in the Board's Report as well make disclosure in terms of LODR.
- 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.

## **POLICY REVIEW**

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.

## **SCOPE AND LIMITATIONS**

In the event of any conflict between the provisions of this Policy and the applicable Act or Listing Regulations or any other statutory enactments or rules, the provisions of Listing Regulations/Act or statutory enactments or rules shall prevail over this Policy and the part(s) so repugnant shall be deemed to severed from the Policy and the rest of the Policy shall remain in force.

## **PRESENT SITUATION**

Currently commensurate with the size and operations, the Company has one male employee. This policy will be effectively applied, if in future, the Company expands its work force where women are also employed