

PREMIER INDUSTRIAL CORPORATION LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

INTRODUCTION:

As a company, we, Premier Industrial Corporation Limited (hereinafter referred to as “**Company**”) are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensure that ethical conduct at all levels is promoted across our value chain. We are dedicated to ensure that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Company. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner, whatsoever.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment (*defined herein below*). Hence, any act of Sexual Harassment or related retaliation against or by any associate is unacceptable. This policy on prevention of sexual harassment (hereinafter referred to as “**Policy**”) therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the Policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment.

1. POLICY:

- 1.1. The Company is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and Sexual Harassment. The Company also believes that all employees of the Company have the right to be treated with dignity.
- 1.2. Sexual Harassment at the work place or other than work place is a grave offence and is, therefore, punishable.
- 1.3. The Ministry of Law and Justice, Government of India, has passed the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (herein after referred to as “**Act**”) with the avowed object of providing protection/prevention against sexual harassment of women at the workplace. The Act further provides for the redressal of complaints of sexual harassment.
- 1.4. This Policy is in compliance with the provisions of the Act and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the “**Rules**”), as may be amended from time to time. It is also in keeping with our commitment to the adoption of best practices.

2. **DEFINITIONS:**

“**Act**” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

“**Aggrieved Individual**” means an individual or group of employees or associate or stakeholder or vendor or partner or candidate who is associated or going to be associated with the Company who has been subjected to any act(s) of Sexual Harassment at work place by a Respondent/s, who is an employee or agent or associate or vendor or partner associated with the Company without prejudice to the similar definitions under applicable laws.

“**Complainant**” shall mean any person reporting an incident of Sexual Harassment and includes:

- Aggrieved person who has been subjected to sexually inappropriate behavior in relation to the workplace.
- Aggrieved Employee;
- Anyone associated with Aggrieved Employee’s, not limited to colleague, relative, friend ; or
- An officer of the National Commission for Women or State Women’s Commission.

“**Internal Complaints Committee**” or “**ICC**” shall mean a committee formed by the management of the Company to inquire into all complaints related to Sexual Harassment and to discharge the functions of an internal complaints committee appointed under the Act and the Rules.

“**Respondent**” means the person against whom the complaint has been made and/ or the person who is alleged to have committed an act of Sexual Harassment.

“**Sexual Harassment**” shall mean and include any of the following (in addition to the meaning provided under section 2 (n) of the Act):

- (a) 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;
- (b) 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;
- (c) eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy;
- (d) act or conduct by a person in authority which creates an environment at the workplace that is hostile or intimidating to a person belonging to the other sex;
- (e) conduct of such an act at workplace or outside in relation to stakeholders of the Company, or vice versa during the course of employment; and/or
- (f) any unwelcome gesture having sexual overtones.

“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; and/or
- (c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

3. SCOPE AND EFFECTIVE DATE:

The Policy extends to all categories of employees of the Company, including permanent management and workmen, temporaries, consultants, trainees and employees on contract at their workplace or at client sites and is deemed to be incorporated in the service conditions of all stakeholders and comes into effect immediately.

4. INTERNAL COMPLAINTS COMMITTEE:

- 4.1. An Internal Complaints Committee has been constituted by the management to consider and redress complaints of Sexual Harassment. The Managing Director may constitute such other committees as may be required for the purposes of the Act at various locations of the Company.
- 4.2. Initially, and till further notice, the Internal Complaints Committee will comprise the following members:
 - (a) Presiding Officer who shall be a woman employed at a senior level at workplace amongst the employees.
 - (b) At least two members from amongst employees preferably committed to the cause of woman or who have had experience in social work or have legal knowledge.
 - (c) One member from amongst NGO or associations committed to cause of woman or any professional or a person familiar with the issues relating to sexual harassment.

Out of the aforesaid members at least two members will be of the same gender as that of the Complainant, subject to at least one-half of the total members so nominated being women.

- 4.3. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer and at least two other members, one of whom shall be a woman.
- 4.4. You may reach the Internal Complaints Committee and report the matter to the below committee ID: icc@picl.in

5. REDRESSAL PROCESS:

- 5.1. Any Complainant who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the ICC in writing with his/her signature within a period of 3 months from the date of occurrence of incident and in case of a series of incidents, within a period of 3 months from the date of occurrence 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.

- 5.2. 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
- 5.3. 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
- 5.4. 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.
- 5.5. 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.
- 5.6. 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.
- 5.7. The Committee will hold a meeting with the Complainant within five working days of the receipt of the complaint.
- 5.8. 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 the event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 5.9. Thereafter, the person against whom a 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.
- 5.10. In the event, the investigation leads that 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 writing.
- 5.11. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

5.12. Where the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to the Company to take action against the Respondent, which may include:

- a written apology from the Respondent
- a letter of warning may be placed in the personal file of the Respondent
- reprimand or censure
- immediate transfer or suspension without pay
- termination from service
- withholding of pay rise or increments
- undergoing a counseling session
- carrying out community service
- register an FIR against the Respondent in case the act alleged, prima facie constitutes an offense under the Bhartiya Nyaya Sanhita, 2023.
- deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Individual or to his/ her legal heirs

6. ENQUIRY PROCESS:

- 6.1. The ICC shall immediately proceed with the enquiry and communicate the same to the Complainant and the Respondent.
- 6.2. The ICC shall prepare and hand over the 'statement of allegations' to the Respondent and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 6.3. The ICC shall be provided with a copy of the written explanation submitted by the Respondent.
- 6.4. If the Complainant or the Respondent desires any witness/es to be called, they shall communicate in writing to the ICC the names of witness/es whom they propose to call.
- 6.5. If the Complainant desires to tender any documents by way of evidence before the ICC, she / he shall supply originals/copies of such documents. Similarly, if the person against whom a complaint is made, desires to tender any documents in evidence before the ICC he / she shall supply originals/copies of such documents. Both shall affix his / her signature on the respective documents to certify these.
- 6.6. The ICC shall call upon all witnesses mentioned by both the parties.
- 6.7. The ICC shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective cases.
- 6.8. The ICC shall complete the enquiry within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Managing Director / Board of Directors / HR Head . 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.
- 6.9. The Managing Director / Board of Directors / HR Head will direct appropriate action in accordance with the recommendation proposed by the ICC. The disciplinary action shall be commensurate with the nature of the gravity of the offence and shall include without limitation – Warning, written apology from offender, bond of good behavior, transfer, debarring from supervisory duties, denial

of employee benefits like increments/promotion/salary correction, etc., cancellation of specific work assignment, suspension, dismissal.

6.10. The ICC shall be governed by such rules as may be framed by the Supreme Court of India by order or any other legislation enacted from time to time.

7. ACTION DURING PENDENCY OF INQUIRY:

7.1. During the pendency of an inquiry, on a written request made by the Complainant, the ICC may recommend the following to the Company:

- transfer the Aggrieved Individual or the Respondent to any other workplace;
- grant leave to the Aggrieved Individual upto a period of three months;
- grant such other relief to the Aggrieved Individual as may be prescribed under applicable law; or/and
- restraint the Respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer.

7.2. The leave granted to the Aggrieved Individual shall be in addition to the leave he/she is otherwise entitled to.

7.3. On receiving a recommendation from the ICC, the Company shall implement the recommendations and send a report of such implementation to the ICC.

8. SETTLEMENT OPTION PRIOR TO INITIATION OF INQUIRY:

8.1. Notwithstanding anything stated above, prior to initiation of enquiry, the ICC may at the instance of, and pursuant to specific requests of the Complainant, initiate conciliation proceedings for the resolution of the complaint of Sexual Harassment.

8.2. In the event, the Complainant and Respondent agree to settle the matter by conciliation, the ICC will discharge its functions in the capacity of an advisory body.

8.3. The following steps shall be taken for resolution of a Sexual Harassment complaint by conciliation:

- The Internal Committee will hold meetings with the Respondent and Complainant independently/separately (in person/ virtual/ over call as deemed fit) for facilitating the conciliation process.
- The Complainant may choose to proceed with the conciliation in the presence of the Respondent (same room) or independently. The ICC will decide on the manner in which the conciliation proceedings will be conducted based on any specific requests from the Complainant and based on assessment of the gravity of Sexual Harassment alleged.
- The Internal Committee will have an advisory role on the content of the dispute and the outcome of the resolution.

8.4. The Complainant shall have the liberty to withdraw from the conciliation process at any stage during the conciliation process. However, the Complainant shall intimate such decision of withdrawal in writing to the ICC.

8.5. In cases where a settlement is successfully arrived at, the ICC will record the terms of settlement and no further inquiry shall be conducted by the ICC.

- 8.6. A copy of the terms of settlement so arrived at shall be sent to the Aggrieved Individual and the Respondent for the purpose of obtaining signatures. Once both signatures are obtained, a copy of the signed terms of settlement shall be sent to the management so as to enable implementation of the terms of settlement.

9. APPEAL

In the event that any person is aggrieved from the recommendations made by the ICC or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by the Act and the Rules, within a period of ninety days of the recommendations.

10. OTHER POINTS TO BE CONSIDERED:

- 10.1. The ICC may recommend to the Managing Director / Board of Directors / HR Head action which may include transfer or any of the other appropriate disciplinary actions.
- 10.2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 10.3. 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.
- 10.4. The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to Board of Directors / NRC Committee.
- 10.5. In case the Committee find the degree of offence coverable under the Bhartiya Nyaya Sanhita, 2023, then this fact shall be mentioned in its report and appropriate action shall be initiated by the management, for making a police complaint.
- 10.6. The ICC is required to submit an annual report of complaints received and action taken to the District Officer.
- 10.7. The Company shall conduct regular orientation, workshops and awareness programmes for employees and ICC members to ensure effective implementation of this Policy in compliance with the Act.

11. 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.

12. 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.

13. 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.

A handwritten signature in blue ink, appearing to read "Munira", is located in the lower right quadrant of the page.