

The policy shall be called- Policy for Prevention of Harassment in Workplace (Prevention, Prohibition and Redressal). This act shall be applicable to all employees of Manjushree group of companies.

1) Purpose

Manjushree Ventures gives equal employment opportunity and is committed to creating a healthy work environment that enables employees to work without fear of prejudice, discrimination, gender bias and harassment. The company is committed to providing appropriate mechanisms that will prevent an employee or individual from undergoing harassment, and to seek redressal, assistance in detecting and eliminating harassment at the workplace.

2) Scope

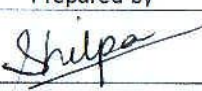
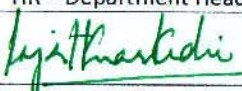
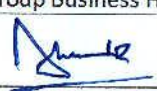
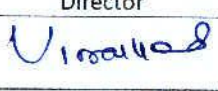
This policy shall be applicable to all employees and is deemed to be incorporated in the service conditions of employees Observation employees, Probationary employees, and Confirmed employees; It includes those on deputation, part time or working as consultants, temporary or Contract basis and as Apprentice.

3) Definition of Sexual Harassment

An act of Sexual harassment could include any unwelcome behavior of a sexual nature that could be reasonably expected to make someone feel offended, humiliated or intimidated.

This may also include (but is not restricted to):

- i. An unwelcome physical contact such as touching or fondling, unnecessary brushing up against someone and advances.
- ii. A request for sexual favors.
- iii. Unwelcome comments about someone's sex life or physical appearance.
- iv. Leering and ogling.
- v. Sexually offensive comments, stories, or jokes.
- vi. Displaying sexually offensive photos, pinups, or calendars, reading matter or objects.
- vii. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes.
- viii. Giving gifts or leaving objects that are sexually suggestive.
- ix. Sexual propositions or continued requests for dates.
- x. Indecent assault or rape (these are criminal offences).

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If they are committed, directly or indirectly wherein the employee believes that such conduct and non-submission to the same may:

- xi. Give rise to a hostile and offensive work environment; or
- xii. It is implicitly or explicitly suggested that submission to or rejection of the conduct will be a factor in employment decisions or evaluations, or permissions to participate in a company activity; or
- xiii. May have an adverse effect on the salary/retainer/honorarium drawn by the employee vis-a-vis the company; or
- xiv. May adversely affect continuity of the employee's employment or engagement with the company; or
- xv. May adversely impact the growth prospects of the employee in the company; or
- xvi. May affect the health & security as well as emotional well-being of the employee.

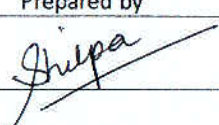
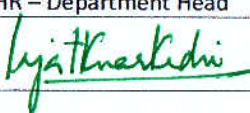
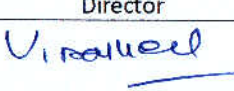
4) Internal Complaints Committee (ICC)

The Internal Complaints Committee ("ICC") of the company will receive and redress complaints that are classified as Harassment. A minimum 4 members at equal ratio of Men and Women.

The ICC will consist of the following members:

Mrs. Niddhi Kedia	Chairperson of ICC	Director	Manjushree Ventures
Ms. Shilpa Kulkarni	Female Member	HR Manager	Manjushree Ventures
Mr. Kamal Sharma	Male Member	Finance Dept	Manjushree Ventures
Mr. Kalyan SVNRR	Male Member	Production	Manjushree Spntek
Ms. Vijaya V	Female Member	QA Manager	Manjushree Packtek
Mrs. Ekta Poddar	Female Member		External Consultant

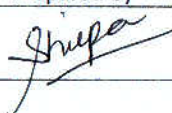
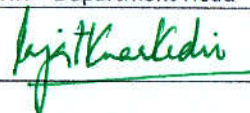
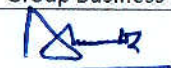
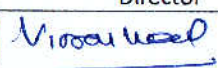
A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson at least two members, one of whom shall be a lady.

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5) Redressal Process

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 the incident.

- i. Any employee subjected to harassment shall lodge a complaint of the incident to the ICC in writing with his/her signature within 10-15 days of occurrence of such incident.
- ii. The Committee will maintain a register to record the complaint received by it and keep the contents confidential, if the complainant so desired, except to use the same for investigation.
- iii. The complaint shall contain all materials and relevant details concerning the alleged acts including the name of the contravener.
- iv. All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to appropriate disciplinary action.
- v. The ICC will meet the complainant within five days of receipt of the complaint.
- vi. The company will make provision for the transfer of the aggrieved to another section or office if requested and if possible.
- vii. The ICC will gather details of the complaint, including any corroborative material with documentary proof, oral or written material, etc., to substantiate the complaint.
- viii. A copy of the complaint as recorded by the ICC shall be given to the Accused within 3 days of recording the same. The Accused must submit a written response to the ICC within two days of receiving the copy of complaint.
- ix. Thereafter, the person against whom the complaint is made may be called for a deposition before the Committee and an opportunity shall be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- x. If the ICC finds, during preliminary enquiry that the offence committed falls within the purview of the Indian Penal Code, then the same shall be notified to the company for initiating immediate action with appropriate government authorities.
- xi. Thereafter, the ICC will summon the accused and witnesses named by both complainant and the accused for a formal enquiry.
- xii. Within three days of completing the enquiry the committee shall submit its report to the Company. An Enquiry report will be submitted within 60 days of receipt of the

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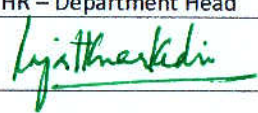
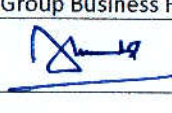
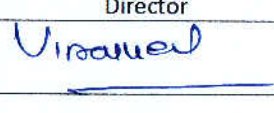
complaint which will include the recommendation for disciplinary action. All members shall sign the said report.

- xiii. Disciplinary action may vary based on the gravity of the offence from issuance of warning letter to imposing penalty, invoking suspension, and including termination.
- xiv. If the complaint is found to be false or done with malicious intent, then disciplinary action can be initiated against the complainant as prescribed by the ICC.
- xv. The management of the Company shall not later than seven days of receipt of the report, act against the accused or the complainant if the complaint is found to be false.

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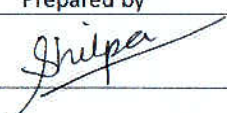
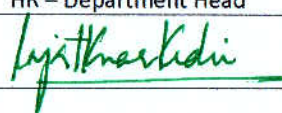
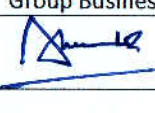
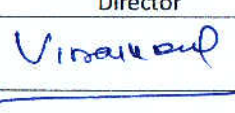
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- xxviii. Disciplinary action may vary based on the gravity of the offence from issuance of warning letter to imposing penalty, invoking suspension, and including termination.
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5) Enquiry Process

- i. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom the complaint is made.
- ii. The Committee shall prepare and hand over the Statement of Allegation to the person against whom the complaint is made and give him / her opportunity to submit his/her written explanation if she / he so desires within 7 days of receipt of the same.
- iii. The Complainant shall be provided with a copy of the written explanation received from the person against whom the complaint has been made.
- iv. If the Complainant or the person against whom a complaint is made if so, desires may present, his/her witness(s) and the same shall be communicated in writing to the Committee with names of witness(s) whom they propose to call.
- v. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall submit original copies of such documents before the Committee. Similarly, if the person against whom a complaint is made desires to tender any documents in evidence before the Committee, he/she shall submit original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.
- vi. The Committee shall call upon all witnesses mentioned by both the parties.

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- vii. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom the complaint is made, to put forward and defending their respective case.
- viii. The Committee shall complete the "Enquiry" within a reasonable period but not exceeding one month and submit its findings to the Management. The report of the committee shall be treated as an enquiry report based on which an erring employee can be awarded appropriate punishment straightaway.
- ix. The Management, after study, shall initiate appropriate action in accordance with the recommendation proposed by the Committee.
- x. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted under statute on the subject.

6) Salient Points to be Considered.

- i. The Committee may recommend the Management suitable action which may even include termination of service if the situation so warrants or any other appropriate disciplinary action depending upon the gravity of the offence.
- ii. The management shall provide all necessary assistance for the purpose of ensuring full, effective, and speedy implementation of this Policy.
- iii. Wherever sexual harassment can occur because of an act or omission by any third party or outsider at Company premises, the Management shall take all steps necessary to prevent occurrence of such harassments.
- iv. The Committee shall analyze and put-up report on all complaints on this subject at the end of the year to the Management so as to enable it to analyze and evolve suitable strategy for total prevention of any such harassment.
- v. In case the Committee finds the degree of offence attracts the Indian Penal Code, then this fact shall be mentioned in their report and appropriate action shall be initiated by the Management accordingly.

This policy is to be administered without obstructing any legal remedies available to either or all parties. This policy is to ensure that Manjushree Ventures acts and works in accordance with law.

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