

SAI CAPITAL LIMITED

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POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

Sai Capital Limited always believed in providing a safe and harassment free workplace for every individual working in Liberty's premises through various interventions and practices. The Company always endeavor to create and provide an environment that is free from discrimination and harassment including sexual harassment. The Company always provide an equal employment opportunity to employer and is committed to provide a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

The Internal Complaint Committee has been formed to prohibit, prevent or deter the commission of acts of harassment of employees including sexual harassment at workplace and to lay down the guidelines for identification, reporting and precaution of sexual harassment

1) Scope

The scope of this policy extends to all employees of Sai Capital Limited and as well as employees through contractors.

2) Definition of Sexual Harassment

The definition of sexual harassment shall be drawn from Sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

3) Complaint Redressal Committee

A Committee has been constituted to consider and redress complaints of harassment including Sexual Harassment. The constitution of the Committee can be changed at any time as per the Management decision and in line with the Act. The following employees have been elected as the Chairperson and Members of the Committee:

- a) **Presiding Officer (Chairperson):**
- b) **Members:**

In case of the manufacturing units, the Unit Heads shall follow this policy for their respective units and the complaints committee shall be elected from the unit itself. The names of such members shall be included in the Prevention of Sexual Harassment Policy for the unit and shall be displayed at prominent place(s).

4) Committee Meetings

The committee would meet once in a quarter to discuss the issues related to prevention of sexual harassment at the workplace.

5) Operating Guidelines

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.

6) 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 her signature within 3 months 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 allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer 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 to give an explanation, where after, an "Enquiry" shall be conducted.
- 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.

7) 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 an opportunity to submit a written explanation if 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 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 shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.
- F. 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.

- G. The Committee shall complete the "Enquiry" within reasonable period but not beyond 90 days from date of receipt of complaint and communicate its findings and its recommendations for action to the Management. 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.
- h) The Management will direct appropriate action in accordance with the recommendation proposed by the Committee.

8) Disciplinary Action

- a) Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.
- b) 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.

9) Confidentiality

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

10) Protection against retaliation

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any Other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

11) Documentation

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's Personal files with the full report of the Complaints Committee.

12) Complaints made with a malicious intent

The Internal Complaint Committee has been constituted as a tool for our employees to have a forum to approach in the event of instances of sexual harassment to ensure them justice and fair play. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.