

POLICY ON SEXUAL HARASSMENT

1.0 Policy

1.1 TAMBOLI CAPITAL LIMITED (“TCAP”) 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. Sexual harassment at the work place or other than work place if involving employees (see clause 2.3 below) is a grave offence and is, therefore, punishable.

1.2 The Supreme Court has also directed companies to lay down guidelines and constitute a forum for redressal of grievances related to sexual harassment.

2.0 Scope

2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in their service conditions.

2.2 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 or for any other such motive;
- ii) Unwelcome sexual advances involving verbal, non-verbal or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mails, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, inappropriate sounds, display of pictures, signs, verbal or non-verbal communication which offend the individuals sensibilities and affect her/his performance;
- iii) Eve teasing, innuendos and taunts, physical confinement against one’s will and any act which is likely to intrude upon one’s privacy;
- iv) Act or conduct by a person in authority which creates an environment at workplace that is hostile or intimidating to a person belonging to the other sex;
- v) Conduct of such an act at work place or outside in relation to an Employee, or vice versa during the course of employment; and
- vi) Any unwelcome gesture by an employee having sexual overtones

2.3 “Employee” for the purpose of this policy means any person working on the premises of the Company, including those on deputation, contract, temporary, part time or working as consultants.

3.0 Complaint Redressal Committee

3.1 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:

Sexual Harassment Complaint Redressal Committee

1. Ms. Priyanka D. Jasani, Chairperson
2. Shri Vaibhav B. Tamboli, Member & Alternate Chairman
3. Shri Vipul H. Pathak, Member

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

4.0 Redressal Process

4.1 Any employee who feels he/she 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.

4.2 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.

4.3 The Committee will hold a meeting with the Complainant normally within five days of the receipt of the complaint, but, in any case, no later than a week.

4.4 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 documentary proof, oral or written, etc., to substantiate her/his 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 the complainant and record the statement.

4.5 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, whereafter, where warranted, a formal Enquiry shall be conducted.

4.6 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.

4.7 In case the complaint is found to be false or frivolous, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

5.0 Enquiry Process

5.1 The Committee shall expeditiously proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

5.2 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 he / she so desires, within 5 days of receipt of the same.

- 5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 5.4 If the Complainant or the person against whom a 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.
- 5.5 If the Complainant desires to tender any documents or any other material by way of evidence before the Committee, she / he shall supply originals of such documents / material. Similarly, if the person against whom a complaint is made desires to tender any documents or material in evidence before the Committee he / she shall supply the originals.
- 5.6 The Committee shall call all the witnesses mentioned by both the parties to the enquiry.
- 5.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom a complaint is made, for putting forward and defending their respective case.
- 5.8 The Committee shall complete the Enquiry within a reasonable period, preferably within one month and communicate its findings and its recommendations for action to the Head- HR. 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 by the management.
- 5.9 The Head-HR will facilitate appropriate action, keeping in view, the recommendation of the Committee.
- 5.10 The Committee shall be governed by such rules as may be framed by the orders of Supreme Court or any other legislation enacted later on and supplemented by internal guidelines of the Company.

6.0 Other points to be considered

- 6.1 The Committee may recommend to the Head-HR action which may include transfer or any other appropriate disciplinary actions, including termination from service.
- 6.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 6.3 Where sexual harassment occurs as a result of an act of omission or commission by any third party or outsider, TCAP shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 6.4 The Committee shall analyse and put up a report on all complaints of this nature at the end of the year for submission to the CEO and the Board of Directors of the Company.
- 6.5 In case the Committee finds the degree of offence to be coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action may be initiated by the Management for making a Police Complaint.

7.0 Adoption of this Policy & Effective Date: This Policy has been approved by the Board of Directors in its meeting held on 13.02.2021.