

ADVIK CAPITAL LIMITED

CIN: L65100DL1985PLC022505

**POLICY ON PREVENTION
OF SEXUAL HARASSMENT
AT WORKPLACE**

I. POLICY STATEMENT

This policy “Prevention of Sexual Harassment Policy” has been framed in reference to the requirement of “Sexual Harassment of Workmen at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter referred to be as “the Act”). Accordingly, this Policy covers all the important aspects of the Act and rules framed thereunder. However, for any clarification, the respective provisions of the Act and rules shall prevail over this Policy.

II. SCOPE AND OBJECTIVE

Our Company is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of every employee and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

This Policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual Harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes:

- a) All offices or other premises where the Company’s business is conducted in the ordinary course.
- b) All company-related activities performed at any other site away from the Company’s premises.
- c) Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

III. COMPLIANCE OFFICER

The Company shall, form Internal Complaints Committee. The Presiding Officer has been designated as the Compliance Officer. All reports, complaints, doubts or concerns in relation to matters covered by this Policy should be raised by the relevant Designated Persons to the Compliance Officer.

IV. DEFINITIONS

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

“**Applicable laws**” means Securities Laws, Listing Regulations and other laws and statutes applicable to the Company.

“**Board**” means board of directors of the Company as constituted from time to time.

“**Company**” means Advik Capital Limited.

“**Committee**” means an Internal Complaints Committee (“ICC”), constituted by the company in accordance with the Section 4 of the Act, in case of absence or inapplicability of such committee, the chairperson of audit committee will perform the duties of such committee.

“**Policy**” means Policy on Prevention of Sexual Harassment Policy.

“**SEBI Listing Regulations**” means SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended

“**Year**” means financial year.

Any Words and expressions used and not defined in this Policy but defined in the, SEBI Listing Regulation or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation as the context may so require.

V. DEFINITION OF SEXUAL HARASSMENT

According to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -

- physical contact and advances; or
- a demand or request for sexual favor; or
- making sexually colored remarks; or
- showing pornography; or
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The Sexual harassment is *“an unacceptable conduct of a sexual nature, or other conduct based on sex abuse affecting the dignity of men or women at work”*. Sexual harassment will generally be unwanted, unreasonable or offensive or it may be a combination of all three. It may cause the employee who is being harassed to feel threatened or humiliated. It may interfere with the employee’s job performance, undermine job security or create a threatening or intimidating working environment. Although, the word “harassment” has connotations of repeated conduct, an employee can be harassed by a single act. Sexual harassment can consist of several different types of behavior, some of which are more obvious than others. This list is not exhaustive but, for example

- Sexual harassment can take the form of gestures or leering,
- Sending letters,
- Gifts or offensive publications or the use of pin-ups.
- Unwanted jokes, gestures, offensive words on clothing, and unwelcome comments and repartee.
- Touching and any other bodily contact such as scratching or patting a coworker's back, grabbing an employee around the waist, or interfering with an employee's ability to move.
- Physical contact including “accidental” contact, or deliberate patting, fondling or groping.
- Repeated requests for dates that are turned down or unwanted flirting.
- Transmitting or posting emails or pictures of a sexual or other harassment-related nature.
- Displaying sexually suggestive objects, pictures, or posters.
- Playing sexually suggestive music.
- Demand or request for sexual favors.
- Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

Alternatively, sexual harassment may consist of spoken comments, including unwanted propositions, jokes of a sexual nature, questions or comments of a sexual nature or the suggestion that an employee’s career can be advanced by bestowing sexual favors (or alternatively that an employee’s career will be damaged if they do not accede to sexual requests).

VI. REDRESSAL PROCESS

1. 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 3 Months of occurrence of incident. Internal Complaints Committee may extend the time limit for a reasonable cause.
2. Complaint shall be submitted in six copies along with supporting documents and the names and address of witnesses.
3. If complaint cannot be made in writing Committee shall provide reasonable assistance to employee for making complaint in writing.
4. If the aggrieved employee is unable to make complaint, then any of her legal heir may make a complaint on his/ her behalf.
5. The committee shall send one copy of complaint to the respondent within a period of 7 days and respondent shall file his reply within a period of 10 days.
6. The committee at the request of aggrieved employee shall take the steps to settle the case through conciliation without involving any monetary settlement as a basis of conciliation and where the settlement has been arrived, no inquiry shall be conducted.
7. In case, respondent is an employee, the committee shall, proceed to make an inquiry in accordance with the provisions of service rules applicable to the respondent or other prescribed

rules and in case of domestic worker, the local committee shall forward the complaint to the police within 7 (Seven) days for registering the case under Indian Penal Code, 1860, except for those cases which has been arrived for settlement as mentioned in point (f) above.

8. The inquiry shall be completed within a period of 90 days.
9. The committee shall provide a report of findings to the employer within 10 days of completion of inquiry and also to the concerned parties and opportunity of being heard shall also be given to them.
10. If allegation against the respondent has been proved, the committee shall recommend to the employer: -
 - to take adequate action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent.
 - to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate.
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 but a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.
12. If the Complainant was aggrieved from the recommendation made by Committee to employer, then he/she may prefer appeal to the appellate authority notified under clause (a) of Section 2 of the Industrial Employment (Standing Orders) Act, 1946.
13. 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.
14. 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.
15. 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.
16. 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.
17. 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 in writing.

VII. REPORTINGS

- A) Reporting as per the Section 22 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder

The Committee shall in each calendar year prepare an annual report and submit the same to the employer which shall have following details included in its annual report: -

- number of complaints filed during the financial year;
- number of complaints disposed of during the financial year;
- number of complaints pending for more than 90 days;
- number of workshop or awareness programme against sexual harassment carried out; and nature of action taken by the employer.

B) Reporting as per Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

The following disclosure shall be made in corporate governance report forming part of annual report in respect to sexual harassment: -

- number of complaints filed during the financial year
- number of complaints disposed of during the financial year
- number of complaints pending as on end of the financial year.

VIII. ENQUIRY PROCESS

1. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
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 7 days of receipt of the same.
3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
4. 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.
5. 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, she/ he shall supply original copies of such documents. Both shall affix her/ her signature on the respective documents to certify these to be original copies.
6. The Committee shall call upon all witnesses mentioned by both the parties.
7. 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.
8. 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 Head of HR Department. 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.

9. The Head of HR Department will direct appropriate action in accordance with the recommendation proposed by the Committee.
10. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

IX. 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.

X. 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.

The contents of complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner.

XI. OTHER POINTS TO CONSIDERED

1. The Committee may recommend to the Head of HR Department action which may include transfer or any of the other appropriate disciplinary action.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, TPC shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. The Committee shall analyze and put-up report on all complaints of this nature at the end of the year for submission to Head of HR Department.
5. 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.

XII. MISCELLANEOUS

1. Any words used in this policy but not defined herein shall have the same meaning ascribed to it in the Articles of Association of the Company and /or the Companies Act, 2013 or Rules made thereunder.
2. In case of any doubt, ambiguity, dispute or difference arise out of the meaning/interpretation of any word or provision in this Policy, the same shall be referred to the Committee, if formed, otherwise board and the decision of such Committee/ Board in such case shall be final.
3. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and further the objective of good corporate governance.
4. This Policy shall come into force on the date it is approved by the Board of the Company. i.e., with effect from January 17, 2022.

XIII. POLICY REVIEW AND AMENDMENTS

1. Company's Board will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness.
2. Company reserves the right to vary and/or amend the terms of this Policy from time to time.

XIV. DISCLOSURES

The policy shall be disclosed in the Board Report, Annual Report, website ie. www.advikgroup.com and such other places as may be required by the Act and rules framed thereunder, Equity Listing Agreement entered into with the stock exchanges (including any statutory modification(s) or reenactment thereof) and such other laws for the time being force..

XV. DISCLAIMER

The Policy does not in any way restrict the right and provisions of the Indian Statute.

Annexure

Document Control Section

Document Name	
Abstract	
Security Classification	
Location	

Authorization

Document Author	Document Owner	Reviewed By	Approved By

Review and Amendment Log

Version	Modification Date	Section	Amendment/ Modification/Deletion	Brief Description of Change / Review