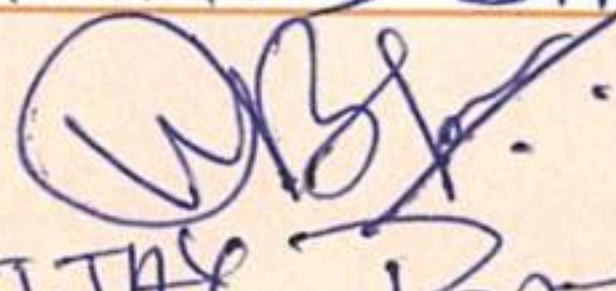


POLICY ON PREVENTION OF SEXUAL HARASSMENT

APPLICABILITY	All Symbiotec Group of Companies
POLICY ADMINISTRATION	
INITIATED BY (Signature with Name)	Anand 02/01/24 ANAND SHEEL
APPROVED BY (Signature with Name)	 VIJAY BAJPAI
WITH EFFECT FROM	15/01/2024
REVIEW BEFORE	14/01/2027
VERSION	V2

1. Purpose

Symbiotec Group of Companies is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. Symbiotec Group of Companies will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act and the provisions of the Act shall prevail. Our Policy on Prevention of Sexual Harassment at workplace intends to provide protection against sexual harassment of our employees at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

2. Scope

The Policy intends to ensure that no Employee is subjected to sexual harassment, and it is applicable to all Employees and covers regular, temporary, ad hoc employees, individuals engaged on daily basis (either directly or through an agent), contract labor, co-workers, probationers, trainees and apprentices with or without the knowledge of the principal employer, whether for remuneration or not, working on a voluntary basis or otherwise, whether the terms of employment are express or implied.

3. Definitions:

- a) **“Act”** means “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and any amendment thereto.
- b) **“Aggrieved Woman”** means any female Employee of Symbiotec or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.
- c) **“Internal Complaints Committee”** means a committee by that name, constituted as per the provisions of the Act.
- d) **“Respondent”** means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.
- e) **“Sexual harassment”** means and includes such unwelcome sexually determined behaviour (whether directly or by implication) as:
 - Physical contacts and advances.
 - A demand or request for sexual favours.
 - Sexually coloured remarks.
 - Showing pornography.
 - Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that his/her objection would disadvantage them in connection with employment, including recruiting or promotion or when it creates a hostile environment.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal, and non-verbal. Examples of conduct or behaviors which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching.
- Physical violence, including sexual assault.
- Physical contact, e.g., touching, pinching.
- The use of job-related threats or rewards to solicit sexual favors.

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker.
- Condescending or paternalistic remarks

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling, Leering

4. Duties of the employer

- (a) Providing a safe working environment.

- (b) Displaying conspicuously at the workplace, the consequences of indulging in acts that may constitute sexual harassment and the composition of Symbiotec Complaint Committee:
- (c) Organizing workshops and awareness programs for members of the Symbiotec Complaint Committee.

5. Symbiotec Complaint Committee

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same Symbiotec has formed an APEX Committee at corporate level and Internal Complaints Committees for sites. The details of the committees are notified to all employees at the location (workplace).

The APEX committee comprises of a minimum of four members as follows:

- Presiding Officer: A woman employed at a senior level in the organization.
- At least two members from amongst employees
- One external member, familiar with the issues relating to sexual harassment.

It must be ensured that >50% of the committee members are women.

The Site's committees shall constitute of a minimum of two members as follows:

- A senior employee.
- A female employee.

On receiving any complaint, the individual site committees shall lodge the complaint, conduct preliminary investigation and forward it is report to APEX Committee

The APEX committee shall be responsible for:

- Receiving complaints of sexual harassment.
- Initiating and conducting inquiry as per the established procedure

- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

The term of the committee members shall be three years only.

Current nominated members of the committees consisting of the following:

MEMBERS OF APEX COMMITTEE

Mrs. Kashish Satwani		Contact- 9826726224
Mrs. Anjali Agrawal		Contact- 9893494340
Mr. Vijay Bajpai		Contact - 9630086094
Mr. M.N Sasi		Contact - 9630090963
Mrs. Sheel Kanungo		Contact - 9630094829

MEMBERS OF RAU-SITE COMMITTEE

Mr. Rajiv Jain		Contact - 9630090612
Mrs. Suhani Jain		Contact - 9630095241

MEMBERS OF PITHAMPUR SITE COMMITTEE

Dr. Pratima Khatri		Contact - 9630096268
Mr. Pankaj Nagar		Contact - 9630096268

6. Redressal Mechanism – Formal Intervention

In compliance with the Act, if the complainant's warrants formal intervention, the complainant needs to lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this Policy. In case of a verbal complaint or complaint received through e mail, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained.

Lodging a Complaint

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the site committee members at the workplace.

The complaint must be lodged **within 3 months** from the date of incident/ last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Site Committee shall render all reasonable assistance to the employee for making the complaint in writing. Employees can lodge complaint via e mail at grievance@symbiotec.in also.

If the aggrieved party is unable to lodge the complaint on account of his/her incapacity, the following may do so on his/her behalf, with explicit written consent.

- Legal heir, relative or friend
- Co-worker
- Any person having knowledge of the incident.

Receiving a Complaint

The following points shall be kept in mind by the receiver of the complaint:

- All conversations are kept strictly confidential. The complainant's agreement is taken to allow proceedings with the matter, which involves a formal investigation. The complainant's agreement is taken to lodge a formal complaint with the presiding officer of the committee.
- The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.

Manner of inquiry into complaint

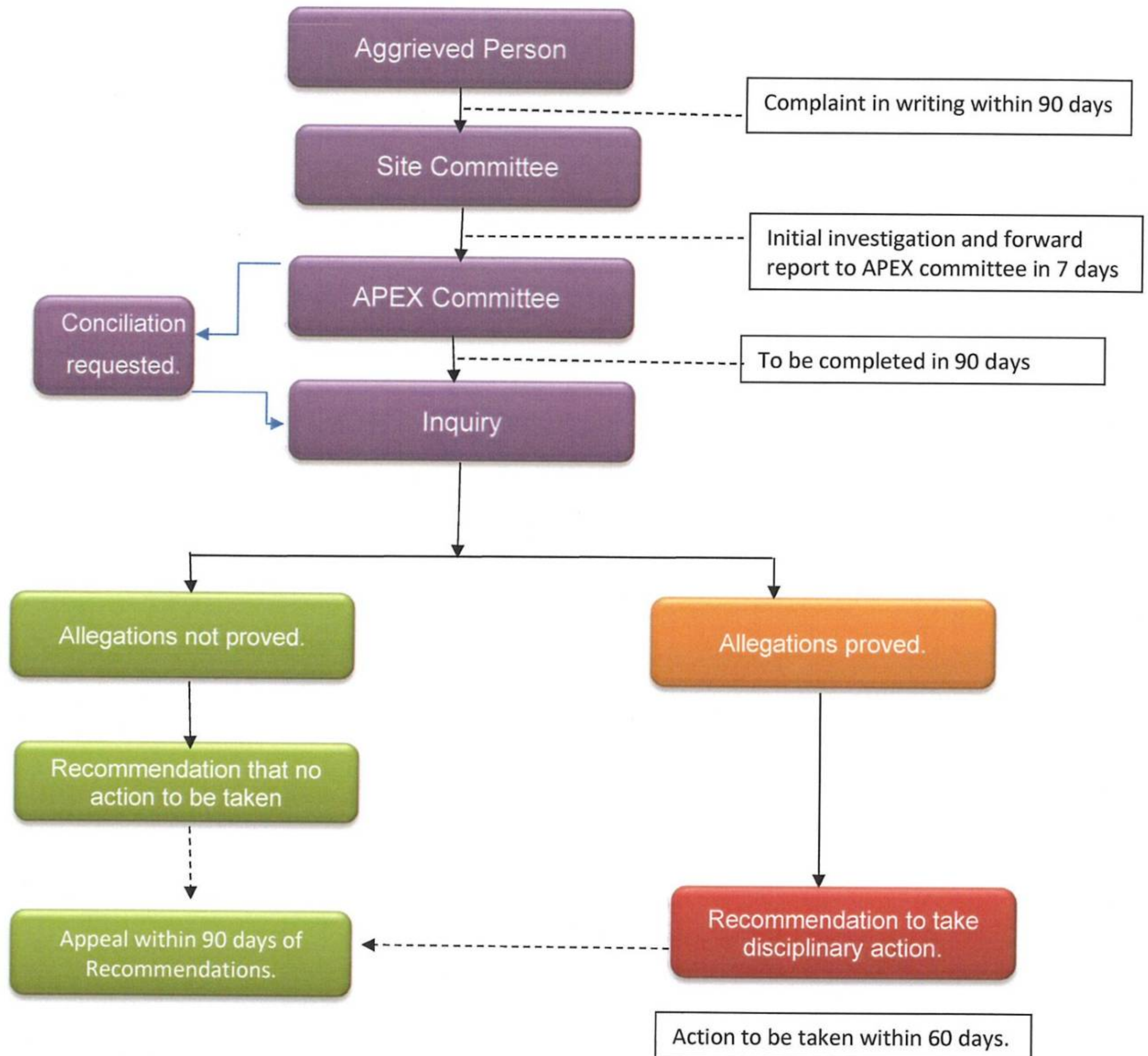
- Complainant shall submit the complaint along with supporting documents and the names of the witnesses.
- Upon receipt of the complaint, the committee shall send one copy of the complaint to the respondent within seven working days.
- Respondent shall reply with all supporting documents within 2 working days of receiving the copy of the complaint.
- No legal practitioner can represent any party at any stage of the inquiry procedure.
- The site committee shall collect all the information and conduct an initial investigation. It shall forward its report to the APEX committee.
- The APEX committee shall conduct the inquiry in accordance with the principles of natural justice.
- In conducting the inquiry, a minimum of three APEX committee members including the Presiding Officer shall be involved.

Inquiry procedure

All proceedings of the inquiry shall be documented. The APEX Committee shall conduct interviews with the respondent separately and impartially. The APEX Committee shall clearly identify exactly what the allegation is and who has made the allegation. The respondent shall be given adequate opportunity to respond and provide any evidence etc. Detailed notes of the meetings shall be prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent shall also be interviewed and statements shall be taken.

The inquiry shall be completed, including the submission of the Inquiry Report, **within 90 days** of the date on which the inquiry is commenced. The inquiry procedure shall ensure absolute fairness to all parties.

7. Process for Complaint and Inquiry



Timelines as per Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

Submission of Complaint	Within 3 months of the incident
Notice to the Respondent	Within 7 days of receiving copy of the complaint
Completion of Inquiry	Within 90 days
Submission of Report by SCC to employer	Within 10 days of completion of the inquiry
Implementation of Recommendations	Within 60 days
Appeal	Within 90 days of the recommendations

8. Dealing with the Complaint

It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the site committee members of any instance or behavior of sexual harassment by a co-worker towards another employee.

The concerned employee shall give his complaint in writing to any of the site committee members giving details of the incident within three months of its occurrence.

All complaints will be kept strictly confidential.

The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated and may invite legal action. The site committee shall conduct a preliminary investigation and collect evidence within 7 days and forward its report to APEX committee.

The APEX committee shall conduct a detailed inquiry and shall ensure that a fair investigation is conducted as per the law of natural justice within 90 days of receiving the report from the site committee.

Both the complainant and the alleged accused initially will be questioned separately with a view to ascertaining the veracity of their contentions. If required, the person who has been named as

a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.

The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 90 days of the receipt of the report from the site committee. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be subjected to suitable disciplinary actions as below.

The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer, and the Employer reserves the right to take a suitable decision.

9. Disciplinary Action

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

10. Confidentiality

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

11. 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 complaint of sexual harassment, the APEX 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 APEX Committee as soon as possible. Disciplinary action will be taken by the APEX Committee against any such complaint which is found to be genuine.

12. Documentation

The APEX Committee and Site Committees 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 files with the full report of the APEX Committee.

13. Dissemination of the Policy

All the employees shall be trained in this policy while joining the company. Also, refresher training shall be provided to all the employees on a yearly basis.

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood, and will abide by the Policy. It is the responsibility of the Site HR Head to ensure that all his/her employees are aware of the policy.

14. Complaint made with malicious intent.

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. 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/her 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.

15. Amendments

HR Department shall periodically review the policy to determine the revisions as may be required in line with the applicable laws. This Policy will be reviewed at least once in every three (3) years in order to determine whether revisions may be required due to changes in the law or regulations, if revisions are required, same is implemented and duly inform to all the employees.