

Anti-Sexual harassment Policy

1.0 POLICY

1.1 Infronics Systems Limited provides an equal employment opportunity for its employees and is committed to create 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. Anti-Sexual harassment at the work place or other than work place if involving employees is a serious offence and is, therefore, punishable.

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

2.0 SCOPE AND EFFECTIVE DATE

2.1 This Policy applicable to all employees of the Company ("Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants).

2.2 Sexual harassment would mean and include any of the following:

Unwelcome sexual advances, involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance. (Employee's dress style, social habits, or previous intimate relationship with a colleague in the workplace be taken into consideration while assessing, whether the conduct was unwelcome or welcome)

Requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy; act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex; conduct of such an act at work place or outside in relation to an Employee of Ravileela, or vice versa during the course of employment; and any unwelcome gesture by an employee having sexual overtones.

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 under:

Committee:

1. **M.S Raju** - Managing Director

2. M.V.S Ramesh Varma –Director

3. S.E Raju, CFO

3.2 A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairman/Chairperson, at least two members, one of whom shall be a lady. The members nominated for the committee should not possess any disciplinary proceedings against him/her through their service.

4.0 ENQUIRY AND REDRESSAL PROCEDURE

4.1 Any employee who feels that she/he 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/his signature within 10 days of occurrence of incident and not later than 3 months of the date of incident.

The committee shall initially try to resolve the issue through counseling & reconciliation between the complainant & respondent.

In case of failure of the reconciliation, the committee initiates the impartial investigation proceedings. Both the parties would be given a fair opportunity to represent their versions along with the findings of the committee.

With in 7 days of receipt of the complaint, the Committee shall send one copy of complaint prepare and hand over the Statement of Allegation to the person against whom complaint is made and give her/him an opportunity to submit a written explanation if she / he so desires within 10 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

- 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.
- 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/his signature on the respective documents to certify these to be original copies.

- The Committee shall call upon all witnesses mentioned by both the parties.
- 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.
- The Committee shall complete the “Enquiry” within reasonable period but not beyond one month and communicate its findings and recommendations for action to the Head-HR. The report of the committee shall be treated as an enquiry report on the basis of which the erring employee can be directly awarded appropriate punishment.
- The Head-HR/Management will direct appropriate action in accordance with the recommendation proposed by the Committee.
- The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted at a later date.
- If the complaint is against the Superiors/co-employee the Management will ensure that the complainant is not discriminated/harassed in day to day work or during sanction of increment/promotion etc.,

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.

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 case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Head-HR/Management.

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 action.

6.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective implementation of this policy.

6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Ravileela shall take all necessary steps to assist the affected person in terms of support and preventive action.

6.4 In case the Committee finds that the offence is coverable under the Indian Penal Code,

then this fact should be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.