

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

THIS POLICY IS SUBJECT TO CHANGE WITHOUT PRIOR NOTIFICATION.

Keeping with our vision and values, we believe in creating a just, fair, vibrant and creative work environment for our people, where each individual is encouraged to deliver his / her best without any exploitation or discrimination on account of gender.

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POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

1. INTRODUCTION

We are committed to creating a safe, secure and congenial work environment for all our employees especially women. The Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (the "Policy") seeks to incorporate and give effect to the guidelines issued by the Supreme Court of India for prevention of sexual harassment at workplace. The Policy is aimed at educating and sensitizing the employees on issues concerning sexual harassment at workplace and to establish a fair, just and unbiased complaint mechanism to deal with the cases of sexual harassment and taking appropriate disciplinary action against the delinquent employee.

The Policy is applicable to all individuals employed in permanent or contractual in nature with KSR Footwear Limited (KFL), irrespective of their gender. The Policy applies equally to relations between superior and subordinates as well as between peers and colleagues.

The Policy also covers complaints from the Company's employees pertaining to instances occurring outside the workplace. Any incident of sexual harassment will be viewed with utmost seriousness. A complaint or report in this regard will be immediately enquired into and

appropriate action will be taken against the employee(s). The disciplinary action to be taken will depend on the nature and seriousness of the offence.

Auditing would be done by the audit team to ensure compliance. Employees who breach the policy will be subject to disciplinary procedures.

2. DEFINITION

Company: KSR Footwear Limited

Sexual Harassment: The awareness regarding gender discrimination and issues concerning sexual harassment, including specific instances of sexual harassment gained momentum in the 1970s. However, even today there is a little agreement on the definition of such behavior. Women define a variety of sexual behaviors at work as sexual harassment, while men tend to rate only the more extreme behaviors at work as sexual harassment.

Based on the directives of The Supreme Court and guidelines enunciated by National Commission for Women.

What is Sexual Harassment?

Sexual Harassment in workplace has been defined to mean unwelcome sexually determined behavior, whether direct or implicit. Following are some of the examples of sexual harassment of a sexual nature:

- Eve teasing, including any indecent gesture, use of indecent language, or any act intended to insult the modesty of a woman or intruding the privacy of a woman employee;
- Unsavoury or sexually coloured remarks, jokes, innuendos, taunts;
- Steering conversation improperly towards sexual preferences, fantasy, or sex life;
- Gender based insults or sexual remarks;
- Unwelcome sexual hints / suggestions in any manner;
- Touching or brushing against any part of the body and the like;
- Displaying or sharing pornographic or other offensive or derogatory pictures, cartoons, pamphlets;
- Forcible physical touch or molestation;
- Demands or request for sexual favours;

- Transmitting any message, by mail, telephone, e-mail, etc., obscene, lewd, suggestive or blatantly sexual in nature;
- Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings;
- Any pervasive pattern of behavior which makes employees feel uncomfortable, insecure or humiliated or disadvantaged on the basis of gender differentiation;
- Actual sexual assault;
- Physical confinement against one's will or any other act likely to violate one's privacy; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The above list is only indicative and not exhaustive, of possible forms of behavior that may qualify as sexual harassment.

Sexual Harassment may be interpreted in the following manner:

- It could be done by a person individually or acting with others;
- It could be directed at either males or females;
- It could occur between peers or individuals in a hierarchical relationship (covert or overt use of inherent power to affect negatively an employee's work experience and opportunities);
- It could either result in a "Quid Pro Quo" (this in exchange of something) or in a hostile working environment (to threaten, coerce, or intimidate an employee to accept sexual advances or making employment decision affecting the individual or creating an intimidating, hostile, or offensive working environment).

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Sexual Harassment is a serious offence that destroys human dignity and violates the right to 'life and liberty' of the victim and acts as an obstacle in achieving gender equality at work. It is an act amounting to misconduct in employment.

Complaint Committee: Complaint committee is constituted to resolve any complaint related to sexual harassment. The constitution and procedure to be followed by the complaint committee is provided in the supporting documents.

Employees: For the purpose of this scheme, 'employees' are those who are on the KFL/ contractual employment rolls.

Reporting Manager: The person to whom the employee in question reports.

3. APPROVAL REQUIRMENTS

All approval decisions are to be taken in line with guidelines laid out in the policy.

4. POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE GUIDELINES

The primary objective of this Policy is to create a congenial work environment that is free from any form of threat or fear. There are few things can be considered to help translate the policy into day- to-day practices.

- Sexual harassment can take many forms: spoken, unspoken, or physical. The employee need to recognize whether he/she is being conditioned to accept behavior that infringes his/her rights and therefore constitutes harassment, as normal workplace conducts.
- 'No' to be said firmly. It is possible that the offenders does not know that his/her behavior is unacceptable. Therefore the prompt /direct statements to be made to communicate that the offender's conduct is not acceptable.
- Participating jokes and sexually tinged conversations is often taken as tacit permission to continue, therefore communications to be made early that the conduct is not acceptable.
- The offenders to be warned to immediately desist, first orally, then if necessary, to be followed up with a warning in writing.
- If the employee is unsure of the course of action in a given situation, he/she to be encouraged to approach any of the Complaint Committee members informally and take their counsel.

The above list is only guiding in nature and indicates certain practices that may be followed in order to prevent instances of sexual harassment. It is clarified that instances of sexual harassment will be viewed strictly and appropriate action will be initiated irrespective of whether the above practices were followed or not. Sexual harassment is not an individual issue between persons involved. It must be treated as an organizational issue.

5. GENERAL GUIDELINES

5.1 Internal Complaint Committee

All the complaints relating to sexual harassment must be expressed or reported without any fear of retaliation. An Internal Complaint Committee has been constituted to take up and enquire into cases of sexual harassment (“**Complaint Committee**”).

The Company has duly constituted the Complaint Committee in terms of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. It is clarified that at all time, the Complaint Committee shall be headed by a woman and at least half of its members shall be women. Further, in order to prevent the possibility of any undue pressure or influence from senior levels, the Complaint Committee shall also have a third party member, who will be well acquainted with the issues concerning sexual harassment. Any change in the composition of the Complaint Committee shall be duly communicated by the Company.

In the event a sexual harassment complaint is received against any member of the Complaint Committee, such a member shall temporarily cease to be a part of the Complaint Committee and the Company shall fill up such vacancy in the Complaint Committee by nominating another person in order to resolve the complaint.

Procedures of the Complaint Committee

- All meetings of the Complaint Committee shall be presided by the chairperson.
- The quorum at the meetings shall be formed by at least three members present, including the Presiding Officer;
- The minutes of meeting of the Complaint Committee shall be prepared and preserved;
- The Complaint Committee shall keep complete and accurate documentation of the complaints, its investigation and the resolution thereof;

5.2 Complaint Process

The following process has been laid down to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously –

- The aggrieved person should give a written complaint to the Complaint Committee or any of its members as soon as possible;
- The complaint should contain all the material and relevant details concerning the alleged harassment including the name of the alleged offender;
- Complete confidentiality should be maintained around the identity of the involved parties during the enquiry and at all times pursuant thereto;
- The Complaint Committee will enquire into the matter. It would be entitled to elicit all forms of evidence in this regard and the concerned parties are obliged to co-operate. The entire process will be completed as early as possible depending upon the complexity of the matter / complaint.
- Both parties will be given an opportunity to present their respective case to the Complaint Committee. If the alleged employee is found guilty then the

Complaint Committee, in consultation with HR, shall initiate appropriate disciplinary action against him/her, including a verbal warning, suspension, or termination of employment. If the action amounts to offence under Bharatiya Nyaya Sanhita or any other applicable law, then the Company's will initiate appropriate criminal proceedings.

- If the sexual harassment is committed by a third party, the Company will take necessary steps to assist the victim in terms of support and preventive action.

5.3 Guiding principles to be followed by the Complaint Committee while handling the complaints relating to sexual harassment:

- It shall be ensured that the career interests of the complainant are not adversely affected by virtue of the complainant having drawn attention to such an offence.
- In order to ensure that this policy is not trivialized, any complaint, which, in the opinion of the Complaint Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the Company and appropriate action against such complainants shall be taken.
- If the Complaint Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the immediate supervisor or manager concerned with the relevant team or department. The matter will be fully examined by the concerned senior management and its conclusions and recommendations will be communicated to the Complaint Committee, following which the Complaint Committee shall take appropriate action.
- Supervisors and managers will also be expected to be sensitive to any circumstance or behaviour amongst their colleagues which appear to go against this Policy. In case they become aware of any such incidence, they will immediately inform the head of the Complaint Committee, and take appropriate action as advised by the Complaint Committee.

The above list is only indicative and not exhaustive, of possible forms of behavior that may qualify as sexual harassment.

5.4 Interim measures during the pendency of the enquiry

During an enquiry of a complaint, the Company may take measures to separate the alleged offender(s) from the complainant. These measures would be taken to minimize the chances of

- (i) The alleged offender(s) further harassing the complainant again, and/or
- (ii) Any retaliation against the complainant.

The Company's may consider the following factors in deciding the interim measures including, but not limited to the following:

- The nature and extent of the allegations;
- The personal safety of the complainant;
- The number of complainants;
- Whether the alleged harassment is of an ongoing nature;
- The behavior of the alleged offender; and
- Whether the alleged offender has a reputation or actual history of engaging in harassment or misconduct.

On the basis of these factors, the Company may decide to adopt the following interim measures. Such measures might include, but not limited to:

- Placing the alleged offender on administrative leave;
- Placing complainant on administrative leave, if the complainant so requests;
- Transferring the alleged offender, or the complainant so requests, to a different area/ department or shift so that there is no further business/social contact between the complainant and the alleged offender; and
- Eliminating the alleged offender's supervisory authority over the complainant.

5.5 Reports to the Government

The Complaint Committee will make an annual reports of the complaints received and action taken by it and submit it to concerned government department. The Company and the head of the Complaint Committee shall also report on the compliance of this policy including the reports of the Complaint Committee, to the concerned Government Department.

KSR Footwear Limited reserves the right to amend / modify the contents of this policy, at its sole discretion and without any prior intimation. The employees are required to keep themselves updated, from time to time, in respect of subsequent amendments to this policy.

6. ROLE AND RESPONSIBILITIES

Employees	• Discourage sexual harassment in any form • Bring in the notice the Complaint Committee / Reporting Manager / HR representative any instance of sexual harassment
HR representative	Provide necessary assistance and guidance to the employee
Reporting Manager	Provide necessary assistance and guidance to the employee

7. CONTACTS

Questions related to specific information on the policy should be addressed to the appropriate HR Representative of KSR Footwear Ltd.