

PRAMARA PROMOTIONS LIMITED

POLICY FOR PREVENTION OF SEXUAL HARRASMENT OF WOMEN

**[In Compliance as per Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Act, 2013]**

1. INTRODUCTION:

1. Pramara Promotions Limited ("**the Company**") believes in the conduct of its affairs in a fair and transparent manner to foster professionalism, honesty, integrity and ethical behavior. The Company is committed to developing a culture where it is safe for all the employees to raise concerns about any misconduct or unacceptable practice by a co- employee.
2. For this purpose, the Company has adopted a Code of Business Conduct, which lays down the principles and standards that should govern the actions of the Company and its employees. The Code of Business Conduct requires the employees not only to comply with and strictly adhere to the standards of the business conduct contained therein but also report to the Chairman or Managing Director for any misconduct or any illegal activity, fraud or abuse of the assets of the Company. The employees reporting any misconduct shall be suitably protected and no unjust action(s) will be taken against any such employee(s).
3. In accordance with the Provisions of Sexual Harassment of Women at work place (Prevention, Prohibition and Redressal) Act, 2013, the Company shall have to implement policy to provide protection against sexual harassment of women at work place and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.
4. The sexual harassment results in violation of the fundamental rights of women to equality under articles 14 and 15 of the Constitution of India and their right to life and to live with dignity under article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.
5. It is required to implement this policy to protect the fundamental and human rights of the women against the sexual harassment at work place of the Company.

2. OBJECTIVE:

1. The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, our Company is committed to providing work environment that ensures every employee is treated with dignity, respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees 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 employees are not subjected to any form of harassment when they are working in the Company.
2. The Company shall circulate the existence and contents of this Policy to all the Employees.

3. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at customer's sites if any. The Company will not tolerate sexual harassment, if engaged in by customers or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is conducted;
2. All company-related activities performed at any other site away from the Company's premises;
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4. DEFINITION OF SEXUAL HARRASMENT:

As per section 2 (n) of Sexual Harassment of Women at Work Place (Prevention, Prohibition and redressal) Act, 2013 - "Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, making sexually coloured remarks, showing pornography, or any other verbal or physical conduct of sexual nature."

Sexual Harassment at the workplace includes:

- a) unwelcome sexual advances (verbal, written or physical);
- b) demand or request for sexual favours;
- c) any other type of sexually-oriented conduct;
- d) verbal abuse or 'joking' that is sex-oriented;
- e) making sexually coloured remarks;
- f) Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc;
- g) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
- h) any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and / or submission to such conduct is either an explicit or implicit term or condition of employment and / or submission or rejection of the conduct is used as a basis for making employment decisions.

5. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. 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.

7. 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.

8. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

9. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment / discrimination and where every employee is treated with dignity and respect.

10. AMENDMENTS TO THE POLICY:

The Board of Directors of the Company shall have the right to amend the policy from time to time without assigning any reason whatsoever.
