

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

COMMITMENT:

Silverpoint Infratech Limited is pledged to preserving a working environment free from sexual harassment. Harassment is against the law and is a form of gender discrimination. The aim of this policy is to prevent harassment of any kind by anyone employed by or associated with the company. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

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 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:

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

DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- unwelcome sexual advances (verbal, written or physical),
- demand or request for sexual favours,
- any other type of sexually-oriented conduct
- verbal abuse or 'joking' that is sex-oriented,
- 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.

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.

COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Complaint Redressal Committee**” used to be created in the Company for time-bound redressal of the complaint made by the victim.

COMPLAINT REDRESSAL COMMITTEE:

The Company has instituted a Complaint Redressal Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Redressal Committee will comprise of the following four members out of which at least two members will be of the same gender as that of the complainant:

1. Head-Corporate HR (**Presiding Officer**)
2. Employee at the level of Assistant General Manager or above from Personnel & Administration Department (**Member**)
3. Divisional Personnel Head of the Division from where the complaint has originated (**Member**)
4. Member from an NGO or Lawyer (**Member**)

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under

A. INFORMAL RESOLUTION OPTIONS:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the