

POLICY ON PREVENTION OF SEXUAL HARRASMENT AT THE WORKPLACE OF PRIORITY JEWELS LIMITED

The policy is adopted by the Board of Directors in their meeting held on April 22, 2025

1. OVERVIEW

1.1. OBJECTIVES

Priority Jewels Limited (the “Company”) facilitates an environment in which employees, agents, vendors and business partners can work in harmony without fear of sexual harassment, exploitation or intimidation. The Company has a zero-tolerance policy towards sexual harassment, required action(s) will be taken to prevent, correct and discipline behaviour which violates this policy.

Any person working here is obligated to respect peers, supervisors and supervisees and condone inappropriate conduct. Managers and supervisors act as role models upholding high standards of conduct, they are obligated to prohibit impartial, hostile, offensive form of behaviour and address grievances in an impartial manner.

The objective of the Policy on Prevention of Sexual Harrasment at the workplace (the Policy) is to provide protection against sexual harassment of individuals at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith. We at the Company are committed to providing a just, fair and impartial working environment and will scrutinize any act of sexual misdemeanour with strict action.

This policy has been framed in accordance with the provisions of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the Act), although this Policy covers key aspectsof the Act, for any clarification the provisions of the Act will prevail.

This Policy is applicable with immediate effect.

2. SCOPE

This Policy extends to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company and its subsidiaries including those employed on contractual basis. The policy extends to those who are not employees of the Company, such as customers, visitors, suppliers, etc., This policy extends to any premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries and virtual spaces which are controlled by the Company. Places visited by the Employee arising out off or during the course of employment contract/engagement with the Company, includingofficial events, official travels, official picnics and official get-togethers, accommodation and transportation provided by the employer for undertaking a journey. Sexual harassment is judged by theimpact on the complainant and not the intent of the Respondent. Sexual harassment as addressedin this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

3. GUIDELINES

3.1. DEFINITIONS

3.1.1 **Sexual harassment** includes acts or behavior conducted implicitly or explicitly such as

- a) physical contact and advances;
- b) a demand for sexual favours;
- c) making sexually coloured remarks;
- d) showing pornography;
- e) making or posting sexual pranks;
- f) sexual teasing;
- g) sexual jokes;
- h) sexually demeaning or sexually offensive pictures, cartoons or other material through email, message or any other form of communication;
- i) Eve teasing;
- j) physical confinement against one's will or any such act likely to intrude upon one's privacy;
- k) persistent watching, following;
- l) implied or explicit unwelcome physical, verbal or non-verbal conduct of sexual nature;
- m) implied or explicit preferential or detrimental treatment in your employment;
- n) implied or explicit threats about your present or future employment status;
- o) interfering with work and creating an intimidating or offensive or hostile work environment; and,
- p) Humiliating treatment likely to affect health or safety

In addition to the above, any act outraging the modesty of a woman employee, will be considered as sexual harassment.

Sexual harassment could also be any unfair treatment to an individual based on the individual's gender, which could be in the form of statements, comments, an isolated event or series of incidents. It can be in the form of gestures, actions or words which causes offence or humiliation creating a hostile work environment. Sexual Harassment can be defined as, any improper conduct, single incident or patterns of behavior that might be perceived as sexual in nature. This will include sexual advances, sexual favour, verbal or physical conduct or gestures or any other behavior that is sexual in nature between people of the opposite or same sex i.e. both men or women can be the victims or offenders.

Abuse of power is when there is an improper use of position, influence, power or authority against another person's career, employment, assignment, contract renewal, performance evaluation or promotion. It might or might not involve threats, blackmail or coercion.

3.1.2 **Aggrieved person:** In relation to a workplace, a person, of any age, whether employed or not, who have been subjected to any act of sexual harassment by the respondent, it

includes contractual and temporary staff, ad hoc or daily wage basis, and includes apprentices, trainees, volunteers and persons employed at a workplace through an agent or contractor and visitors.

3.1.3 Abuse of power: It is when there is an improper use of position, influence, power or authority against another person's career, employment, assignment, contract renewal, performance evaluation or promotion. It might or might not involve threats, blackmail or coercion.

3.1.4 Aggrieved Woman:

- a) in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;
- b) in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house.

3.1.5 Complainant: Any aggrieved person who makes a complaint alleging sexual harassment under this policy

3.1.6 Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved

3.1.7 Employee: A person employed at the workplace for any work on regular, temporary, ad hoc, or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

3.1.8 Employer: A person responsible for management, supervision, and control of the workplace.

3.1.9 Workplace: Any premises, locations, establishments, enterprises, institutions, offices, branches, warehouses or units established, subsidiaries, virtual meeting spaces which are controlled by the Company. Places visited by the Employee arising out of or during the course of employment contract/engagement with the Company, including official events, official travels, official picnics and official get-togethers, accommodation and transportation provided by the employer for undertaking a journey.

3.1.10 Company: "Company" means Priority Jewels Limited.

3.2. INTERNAL COMPLAINTS COMMITTEE

3.2.1 Constitution of The Internal Complaints Committee:

An Internal Complaints Committee has been formed to redress any complaints of sexual harassment. The Committee comprises of:

- Presiding Officer: A woman employee at a senior level in the organization will

act as President of the Committee

- At least 2 members from amongst employees, committed to the cause of women or have experience of social work or having legal knowledge
- One external member from a non-governmental organization, or associations committed to the cause of women familiar with the issues relating to sexual harassment.
- At least one half of the total members nominated will be women

The Presiding Officer and every member shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

3.2.2 Responsibilities of The Committee:

- Receiving complaints of sexual harassment at workplace
- Initiating and conducting inquiry as per the established procedure
- Keep the record of every complaint and settlement and to report it to the employer
- Submitting findings and recommendations of the inquiry
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in prescribed format
- provide the requisite copy of the settlement to the parties to the complaint

3.2.3 Complaint Redressal Mechanism - Filing A Complaint

- i. In case of any inappropriate misconduct or sexual harassment, a complaint letter should be submitted in writing or e-mailed to the Chairperson of the Complaints Committee with specific details, such as, stating the date of misconduct, location of incident, name of the witness and name of the accused.
- ii. This letter can be submitted by any member on behalf of the witness or by the witness herself or himself.
- iii. As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the complaint must be lodged within 3 months from the date of incident or from the date of the last incident. However, at Priority Jewels Limited, we encourage employees to raise their complaint even after this timeline.

Provided that where such a complaint cannot be made in writing, the Presiding officer, or any member of the Internal Complaints Committee shall render all reasonable assistance to the person for filing the complaint in writing

- iv. The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making a complaint in writing, in case they are unable to do so.
- v. If the aggrieved person is unable to file the complaint on account of their

incapacity, the following may do so on their behalf – Legal heir, co-worker, guardian, any person having knowledge of the incident.

- vi. The complainant will need to self-attest the written complaint.
- vii. Where the aggrieved person is unable to make a complaint on account of their mental incapacity, a complaint may be filed by-
 - a relative or friend; or
 - a special educator' or
 - a qualified psychiatrist or psychologist; or
 - the guardian or authority under whose care they are receiving treatment or care; or
 - any person who has knowledge of the incident jointly with any of the above.
- viii. Where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.
- ix. Where the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

3.2.4 Initiation of a Formal Inquiry By The Committee In The Following Cases:

- i. Conciliation not requested by complainant
- ii. Conciliation has not resulted in any settlement
- iii. Complainant tells the committee that terms of conciliation were not complied with

3.2.5 Conciliation

The Committee may, before initiating an inquiry and at the request / demand of the aggrieved employee, take steps to settle the matter between the aggrieved and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation. Such conciliation should be completed within one month from the date of making the complaint.

3.2.6 Investigating A Complaint

- i. The Chairperson of the complaint committee will review the complaint, clarify if the allegations are related to harassment at workplace and all evidence required for the procedure is submitted.
- ii. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment.
- iii. The inquiry Committee is mandated to acknowledge the written complaint and provide a copy of the complaint along with supporting documents to the Respondent within 7 working days of filing the complaint.

- iv. The committee will promptly investigate any allegation made in a free and fair manner and address the complaint within 90 days of receiving the complaint.
- v. This investigation may include private interviews with the complainant, the respondent and witnesses, if any. All notes from the investigation are kept strictly confidential.
- vi. The Complaints Committee makes inquiry into the complaint in accordance with the principles of natural justice
- vii. Resolution through conciliation happens within 2 weeks of receipt of complaint.

3.2.7 Manner of Inquiry:

- i. Complainant should submit six self-attested copies the complaint along with supporting documents and names of the witnesses.
- ii. Upon receiving the complaint, the committee sends 1 copy to the respondent within 7 working days with supporting documents and names of witnesses.
- iii. Respondent is expected to reply to the complaint with all supporting documents including but not limited to names and addresses of witnesses within 10 working days.
- iv. The Internal Complaints Committee shall have the right to summon the respondent and any witnesses as and when deemed necessary.
- v. The Complaints Committee shall have the right to terminate the inquiry or give ex parte decision on the complaint, if the complainant or respondent fails to present himself/herself for 3 consecutive hearings convened by the Presiding Officer.
- vi. The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:
 - summoning and enforcing the attendance of any person and examining him or her under oath;
 - requiring discovery and production of documents;
 - any other prescribed matter.
- vii. Parties shall not be allowed to bring any legal practitioner to represent them.
- viii. The complainant and respondent must cooperate with the inquiry and subsequent disciplinary actions and proceedings.
- ix. The complainant will be made comfortable throughout the procedures and a patient, non-biased hearing will be given.
- x. Complete confidentiality will be maintained of the experiences of the complainant and respondent will be maintained.
- xi. Completion of the inquiry will be done within 90 days from the date on which the inquiry commenced.
- xii. After the procedures a copy of the statement along with evidences and witnesses will be submitted, if the witness is not satisfied with the recommendations, he or she can appeal again.
- xiii. In the case of insufficient information, the impact of the incident on the victim plays an important role in the final decision. More than the intention of the respondent, the experience of the aggrieved person is considered.
- xiv. For conducting the enquiry, the quorum of the Internal Complaints Committee shall be of 4 Members including one President and one Secretary.

- xv. Monetary settlement will not be made as a basis of conciliation.
- xvi. Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

3.2.8 Interim Relief:

During the inquiry the committee may recommend the employer to:

- i. Transfer the complainant or respondent
- ii. Grant leave to the aggrieved person for maximum of 3 months
- iii. Prevent respondent from assessing complainant's work performance
- iv. Grant other relief as may be deemed appropriate
- v. The complainant can refrain from working on a certain project or location, if she experiences any form of threat from the accused.

3.2.9 Action Taken After Inquiry:

- i. Post completion of inquiry the report will be submitted to the employer within 10 days and be made available to both parties.
- ii. In case the complaint was substantiated the committee may recommend action for the misconduct.
- iii. Action may include counselling, censure, written warning, written apology, suspension, withholding of increments, termination, or any other action that the management deems fit.
- iv. In case the complaint was unsubstantiated, the committee may recommend to the employer that no action is required, or they may recommend to punish the complainant for malicious intent and/or false evidence.
- v. In case of a false accusation and malicious intent being clearly established, the action for malicious complaints could be the same as mentioned above in clause 3.2.8 iii. While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.
- vi. The employer will act upon the recommendations within 60 days
- vii. Appeal against the decision is allowed within 90 days of the date of recommendation.

The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to:

- Warning
- Written apology from offender,
- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

3.2.10 Timelines

- i. 6 copies of written complaints along with supporting documents and names and addresses of witnesses have to be filed within 3 months of the date of the incident. Timeline extendable by another 3 months.
- ii. Upon receipt of the complaint, 1 copy of the complaint is to be sent to the respondent within 7 days.
- iii. Upon receipt of the copy of complaint, the respondent is required to reply to the complaint along with a list of supporting documents, and names and addresses of witnesses within 10 working days.
- iv. The Inquiry has to be completed within a total of 90 days from the receipt of the complaint.
- v. The Inquiry report has to be issued within 10 days from the date of completion of inquiry.
- vi. The respondent is required to act on the recommendations of the Committee within 60 days of receipt of the Inquiry report.
- vii. Appeal against the decision of the committee is allowed within 90 days from the date of recommendations.

4. PENAL CONSEQUENCES OF SEXUAL HARASSMENT:

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant

5. CONFIDENTIALITY:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

6. MISCELLANEOUS:

- The Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.
- The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
 - Number of complaints of sexual harassment received during the year;

- Number of complaints disposed-off during the year;
- Number of cases pending for more than 90 days;
- Number of workshops or awareness program against sexual harassment carried out;
- Nature of action taken by the employer.
- The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.
- The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.
- Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.
