



Ambalal Sarabhai Enterprises Limited

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Sexual Harassment Policy

Registered Office:

Shantisadan, Mirzapur Road, Ahmedabad – 380001

Telephone: +9179-25507671/ 25507073, Fax: +9179-25507483, E-mail: ase@sarabhai.co.in

CIN: L52100GJ1978PLC003159

INTRODUCTION:

Sexual harassment is defined under this policy as any conduct that is unwelcome and sexual in nature, whether direct or indirect, including physical contact and advances, a demand or request for sexual favors, making sexually colored remarks, circulating obscene content by email, sms or mms, showing pornography, or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. When any such act or acts are committed in circumstances where such conduct is humiliating and is likely to constitute a health and safety problem, it will amount to sexual harassment that violates this policy.

OBJECTIVES:

- a. To prevent or deter the commissions of acts of sexual harassment.
- b. To provide all its employees an equal opportunity condition of employment, free from gender-based coercion, intimidation, or exploitation and to create a work environment where everyone has an opportunity to fully participate in achieving business success and is valued for the distinctive skills, experiences and perspectives she or he brings to the workplace.
- c. To establish a mechanism and procedure to effectively combat incidents of sexual harassment at the work-place and to resolve complaints against such conduct in a fair and timely manner.

WHAT CONSTITUTES SEXUAL HARASSMENT?

Sexual harassment may occur as a single incident or a series of incidents and may include, but will not be limited to the following which may interfere with an individual's performance by contributing to the creation of an intimidating, hostile or offensive environment:

- a. Implied or explicit promise of preferential treatment in employment, or
- b. Implied or explicit threat of detrimental treatment in employment, or
- c. Implied or explicit threat of detrimental treatment about present or future employment status.

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SEXUAL HARASSMENT INCLUDES, BUT SHALL NOT BE LIMITED TO:

- A sexual demand, the non-compliance of which could result in certain actions being taken by the harasser.
- Comments or conduct of a sexual nature which is objectionable in nature and in which the dignity of a person is impaired.
- Unwanted sexual advances.
- Requests for sexual favors in return for employment benefits.
- Verbal abuse having sexual overtones.
- Innuendoes, including remarks or insinuations about a person's sex life or private life.
- Unwanted infringement of an individual's personal space, which leads to discomfort.
- Suggestive comments about a person's appearance, body or clothing.
- Physical contact, including touching.
- Obscene gestures, indecent exposure.
- Staring, leering, and whistling.
- Any physical or computerized display of sexually offensive or explicit material.
- Direct sexual propositioning.
- Continued pressure for dates and/or sexual favors.
- Letters or calls of a sexual nature; or
- Any of the above as a form of coercion or blackmail for advancement, or in the event of the recipient's refusal, resulting in a lack of advancement or dismissal.

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ELIGIBILITY AND APPLICATION OF POLICY:

This policy will be effective from 30.05.2025 at Ambalal Sarabhai Enterprises Limited. This policy will cover all employees, across all grades, functions and all regions and for all present and future events and applies to all allegations of sexual harassment made by any employee of the Company against another employee irrespective of whether sexual harassment is alleged to have taken place within the Company premises or in any other place visited by such employee for work. All actions prohibited for an employee of the Company by this policy are also prohibited for all individuals who are on the Company premises or on any other property where the Company conducts its business. If an individual commits an act in violation of this policy, whether an employee of the Company or a third party interacting with the Company, the Company will take appropriate remedial measures under the circumstances, including measures to mitigate the potential for repetition, and to discipline any of its employees who may have participated in such conduct, or may have failed to stop such conduct when he or she had actual knowledge of such conduct and the authority to do so.

COMMITTEE MEMBERS:

An internal committee will be formed in accordance with the provisions of law, of all Internal Members and the Presiding Officer will be a woman employer, employed at a senior position in the organization from amongst the employees.

FILING A COMPLAINT:

Any aggrieved employee may approach the committee with a complaint of sexual harassment under this policy. The following steps will be followed in this regard:

Steps to Lodge Complaint against Sexual Harassment:

- i. A written complaint of sexual harassment is to be filed within a time limit of three months. This may be extended to another three months if the Complainant can prove that grave circumstances prevented them from doing the same within the stipulated time of three months.
- ii. An employee making a complaint ("Complainant") has to give the complaint to the Complaints Committee in writing along with supporting documents, names and addresses of witnesses and the said complaint will be afforded confidentiality as per statutory provisions.

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- iii. If the situation is not resolved within seven working days or if the employee is unable to or uncomfortable to address the alleged harasser directly, he or she should report the incident to the employee's manager, human resources or his or her own supervisor.
- iv. it may be helpful to make a written record of the date, time and nature of the incident(s) and the names of any witnesses.
- v. It is important to report concerns of sexual harassment or inappropriate sexual conduct regardless of the seriousness to human resources or a supervisor/manager as soon as possible.

RESOLUTION PROCEDURE:

- i. Incidents of sexual harassment or inappropriate sexually oriented conduct should be reported following the above complaint procedures.
- ii. To initiate a formal investigation into an alleged violation of this policy, employees will often be asked to provide a written sexual harassment complaint with human resources.
- iii. Complaints should be submitted as soon as possible after an incident of alleged sexual harassment.
- iv. To ensure the prompt and thorough investigation of a sexual harassment complaint, the complainant should provide as much of the following information as is possible:
 - a. The name, department and position of the person or persons allegedly causing the harassment.
 - b. A description of the incident(s), including the date(s), location(s) and the presence of any witnesses.
 - c. The alleged effect of the incident(s) on the complainant's position, salary, benefits, promotional opportunities, or other terms or conditions of employment.
 - d. The names of other employees who might have been subject to the same or similar harassment.

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- e. The steps the complainant has taken to try to stop the harassment.
- f. Any other information the complainant believes to be relevant to the harassment complaint.

Sexual harassment does not refer to behavior or occasional compliments which are acceptable to the recipient. Neither can the mutual attraction between two persons be regarded as sexual harassment, as this is a private matter between them.

DISCIPLINARY ACTION:

- a. Employees who violate this policy are subject to appropriate disciplinary action.
- b. If an investigation results in a finding that this policy has been violated, the mandatory minimum discipline is a written reprimand.
- c. The discipline for very serious or repeat violations is termination of employment. Persons who violate this policy also may be subject to civil damages or criminal penalties.
- d. In case an employee wrongfully tries to malign the image of another employee by pressing sexual harassment charges, then disciplinary action can be initiated against such an employee.

CONFIDENTIALITY:

All inquiries, complaints and investigations are treated confidentially.

Information is revealed strictly on a need-to-know basis. However, the identity of the complainant usually is revealed to the respondent and witnesses.

The Head of the committee takes adequate steps to ensure that the complainant is protected from retaliation during the period of the investigation.

All information pertaining to a sexual harassment complaint or investigation is maintained by the committee in secure files.

The committee can answer any questions relating to the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

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