

Policy on Prevention of Sexual Harassment

Sexual harassment would mean and include any of the following:

- Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- Unwelcome sexual advances involving verbal, non-verbal such as sexually colored remarks, jokes, letters, phone calls, e-mail, SMS, gestures, showing of pornography, lewd stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- Conduct of such an act at work place or outside in relation to an Employee of company, or vice versa during the course of employment; and
- Any unwelcome gesture by an employee having sexual overtones

“Employee” means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

Internal Complaints Committee

- An Internal Complaints Committee (ICC) constituted by the Management, will be responsible for resolving and addressing complaints of Sexual Harassment raised at SHFL.
- The Internal Complaints Committee (ICC) comprises of five members:
 - i. A woman representative from the Senior Management who will also act as the Chairman of this Committee
 - ii. Senior representative from the HR
 - iii. Two senior representatives from Business team
 - iv. A third party representative from an NGO or any other agency conversant with the issue of Sexual Harassment.

Prevention of Sexual Harassment Redressal Process

- Anyone believing in good faith that she/he has been subjected to sexual harassment by any employee of SHFL, or anyone with whom SHFL does business, will be required to report it to the 'Internal Compliant Committee' ('ICC') through an email to any of the members of the ICC, at the earliest but not later than 3 months from the date of occurrence of incident. Complaint on phone needs to be followed by a written email. Anonymous letters will not be entertained. The Company shall protect the identity of the complainant, if it is so desired by the complainant.
- The Complainant may also submit any corroborative material with a documentary proof etc., to substantiate his / her complaint.

- If the Complainant does not wish to depose personally before the committee due to embarrassment of narration of an event, then the complainant may depose before any member of the committee in person
- The Committee will hold a meeting with the Complainant within seven days of the receipt of the complaint. If required witnesses may be called in this regard.
- Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation.
- Further enquiry as deemed necessary may be conducted by the committee and decisions taken.
- In case the complaint is found to be true, appropriate action shall be taken against the offender.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Company.