

POLICY FOR PREVENTION OF SEXUAL HARASSMENT

PATEL INFRASTRUCTURE LIMITED (PIL) is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

PIL does 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.

The Prevention of Sexual Harassment Policy has been formed to prohibit and prevent the acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

The Policy for Prevention of Sexual Harassment was constituted in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

APPLICABILITY:

This Policy applies to all the kind of employees (whether in the office premises or outside while on duty) of the Company and all of its group companies, where sexual harassment occurs to an employee as a result of an act by a employee or outsider while on workplace or on official duty, will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

DEFINING SEXUAL HARASSMENT?

Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

- (a) Physical contact and advances;
- (b) A demand or request for sexual favours;
- (c) Sexually coloured remarks;
- (d) Showing pornography;
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

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

COMPLAINT PROCEDURE :

An appropriate complaint procedure in the form of "Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

INTERNAL COMPLAINTS COMMITTEE (ICC):

The Internal Complaints Committee has been created under section - 4 of the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013".

The "Internal Complaints Committee" shall consist of a Chairperson, 3 Internal member and 1 External member. The tenure of the committee shall be not exceeding 3 years & names of the committee members have been announced by the Head HR in Annexure-A. The ICC shall be the authority for disciplinary actions on issues relating to sexual harassment at the workplace.

DEALING WITH THE COMPLAINT:

As per "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" Section - 10 & 11 The policy highlights a preventive focus, there is a need to distinguish between an informal and formal process.

PROCEDURE FOR INFORMAL GRIEVANCE REDRESSAL:

Informal processes normally involve an intermediary means for resolving a problem. In the case of Sexual Harassment, at first instance, the person (i.e. HOD/ HR / Woman representative of the location) may be the point of first contact for anyone seeking informal support/intervention to stop unwelcome behaviour.

A sense of restraint and responsibility on the part of all concerned is critical for the effective functioning of these guidelines. The preventive / informal process that can be adopted is as follows:

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

1. Convey to the person who is the cause of distress, about what that person's actions, words, behaviour is doing and convey in no uncertain terms that such behaviour is not appreciated. What is important is the "Way" a particular behaviour, action or word is perceived; "Intent" is of no consequence.
2. The second step would be to approach someone within the company – preferably your Superior or HR Representative. The Superior or HR Representative would then try and counsel / talk it over with a view towards closing the matter amicably.
3. In any case all such incidents along with the resolution, needs to be reported to the Head of HR who will then provide a short report to the Internal Complaints Committee and the matter will be closed.
4. However, in the event of it not being resolved, then it would need to be escalated to the Internal Complaints Committee.

PROCEDURE FOR FORMAL GRIEVANCE REDRESSAL:

In the event of the complaint not being resolved through informal procedure, then it would need to be escalated to the **Internal Complaint Committee for redressal**.

1. It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the Complaints Committee of any instance or behaviour of sexual harassment by a co-worker towards another employee.
2. The concerned employee shall give his complaint in writing to any of the committee member giving details of the incident within a three month of its occurrence.
3. Once the complaint is received, it will be kept strictly confidential.
4. The person accused will be informed that a complaint has been filed against him and no unfair acts of retaliation or unethical action will be tolerated. The Committee shall ensure that a fair investigation is undertaken immediately.
5. Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the facts of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.

6. The Chairperson after studying the report & discussion with the Committee members shall submit her recommendation to the HR HEAD within 10 days of completing the inquiry.
7. The complainant and the accused shall be informed of the outcome of the investigation.

The investigation shall be completed within 3 months of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly. The implementation of the recommendation of Internal Complaint Committee by Vice President – HR should be done within 30 days of receipt of such recommendation.

PROCEDURE FOR FORMAL GRIEVANCE REDRESSAL:

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal.

This action shall be in addition to any legal recourse sought by the complainant.

CONFIDENTIALITY:

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment, the accused cannot be tolerated in 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.

In case of any contradiction in the policy then the provision of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” shall prevail.

CONCLUSION:

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

INTERNAL COMPLAINT COMMITTEE:

Annexure-A

SEXUAL HARASSMENT REDRESSAL COMMITTEE (SHRC)

ANNEXURE-A

Date :- 01 March 2025

| Name of the Committee Members | Contact No | Email ID |
|---|------------|--|
| RUPAL DAVE PRESIDING OFFICER (SHRC) | 990436033 | rupal.dave@patelinfra.com |
| JOOHI MEKVAN MEMBER-SHRC (INTERNAL) | 6357011589 | joohi.mekvan@patelinfra.com |
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Aswini kumar Sahu

Company Secretary & Compliance Officer

