



Magnum Ventures Limited

MAGNUM VENTURES LIMITED ("MVL")

SEXUAL HARRASMENT PREVENTION POLICY

1. POLICY

Magnum Ventures Limited (MVL) is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment and enables employees to work without fear of prejudice gender bias and sexual harassment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will 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 sexual harassment.

Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore punishable.

2. SCOPE AND EFFECTIVE DATE:

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 and come effective immediately. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

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

3. DEFINATION OF SEXUAL HARRASMENT

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

Sexual Harassment at the workplace includes:

- a. unwelcome sexual advances verbal, written or physical conduct such as sexually coloured remarks, letters, phone calls, e-mail, gestures, showing of pornography, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communications which offends the individuals sensibilities and effect her/his performance;
- b. demand or request for sexual favours in return for employment, promotion, examination or evaluation of a person towards any company activity;
- c. any other type of sexually-oriented conduct;
- d. verbal abuse or 'joking' that is sex-oriented;
- e. 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.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their conduct is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. COMPLAINT MECHANISM:

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

6. INTERNAL COMPLAINTS COMMITTEE:

The Company has instituted an Internal Complaints Committee for Paper and Hotel Unit for redressal of sexual harassment complaints (made by the victim) and for ensuring time bound treatment of such complaints.

The Complaints Committee will comprise of the following Five members:

*[1. Ms. Sukhpreet Bedi - Chairperson

2. Ms. Lalita- Member

3. Mr. Dybendra Ghosh- Member

4. Mr. Sandeep Bisht - Member

5. Ms. Poonam Srivastava- External Member]

Company Secretary of the Company shall be ex-officio Secretary of the Committee.

A quorum of 2 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson.

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; and
- Discouraging and preventing employment-related sexual harassment

The term of the office of the Committee shall be three years:

- In case of any vacancy occurring in the committee, it shall be filled in for the remainder of the term of office of the committee by the Board of Directors and in case of no meeting of Board is scheduled within next month by Managing Director or through Board Resolution by Circular resolution.
- The Policy will be posted on the website of the Company.

7. REDRESSAL PROCESS:

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

** Internal Complaint Committee was re-constituted by the Board in the Board Meeting held on 14th February, 2023.*

- Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within three months of occurrence of incident or within three months from last incidence in case of series of incidence.
- Where such complaint cannot be made in writing, presiding officer or member of Committee shall render all reasonable assistance to the woman for making the complaint in writing.
- The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity of being heard will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 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 Management.

8. ENQUIRY PROCESS

- The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7days of receipt of the same.
- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature, wherever possible, on the respective documents to certify these to be original copies.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Managing Director. The report of the committee shall be treated as an enquiry report on the basis of which an accused employee can be awarded appropriate punishment straightaway.

- Chairperson of the Committee shall ensure that law of natural justice is not violated either during preliminary investigation or during enquiry proceedings.
- The Chairperson will direct appropriate action in accordance with the recommendation proposed by the Committee.

Corrective action may include any of the following:

- Formal apology
- Counseling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence.

9. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

10. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

11. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment 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.

12. CONFORMITY WITH ACT:

In case any provision of this policy is or becomes contrary to the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or Rules prescribed thereunder, the provisions of the Act prescribed to the extent of repugnance shall prevail over the provisions of this policy.

13. CONCLUSION:

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

For and on behalf of **Magnum Ventures Limited**

Signed and approved by-
Board of Directors