

POLICY ON PREVENTION AND REDRESSAL OF WORKPLACE SEXUAL HARASSMENT

Overview

This policy on prevention and redressal of workplace sexual harassment (“**POSH Policy**”) will be applicable to the office(s) of **JAYNIX ENGINEERING PVT LTD** (“**Company**”) in India. This POSH Policy has been framed in consonance with applicable law and has been introduced to prohibit, prevent, and redress grievances of workplace sexual harassment of women in a time-bound and sensitive manner.

Meaning of Sexual Harassment

Sexual Harassment means any one or more of the following unwelcome acts or behaviour:

- (i) Physical contact and advances;
- (ii) A demand or request for sexual favours;
- (iii) Making sexually coloured remarks;
- (iv) Showing pornography; or
- (v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Further, the following circumstances may amount to Sexual Harassment if it occurs or is present in relation to any other act of Sexual Harassment:

- (i) Implied or explicit promise of preferential treatment in employment;
- (ii) Implied or explicit threat of detrimental treatment in employment;
- (iii) Implied or explicit threat about present or future employment status;
- (iv) Interference with work or creating an intimidating or offensive or hostile work environment; or
- (v) Humiliating treatment likely to affect health or safety.

Prohibition of Sexual Harassment at the Workplace

The Company has a ‘zero-tolerance’ approach to any instance of Sexual Harassment. Sexual Harassment of women at Company’s workplace(s), whether during or after working hours, is strictly prohibited under the law and this policy. For the purpose of this POSH Policy, it is clarified that ‘workplace’ also includes any place visited by an employee arising out of or during the course of employment, including transportation that may be provided by the Company.

Internal Committee¹

The Company has constituted an Internal Committee (“**IC**”) to investigate allegations of Sexual Harassment at the Company’s workplace. The Company reserves the right to add to, remove or replace the IC members from time to time.

¹ **Note to Company:** Please note that per the POSH Act, every IC must at least be comprised of the following members: i) A Presiding Officer: a woman employed at a senior level in the workplace; ii) Members: Not less than 2 members who are employees, preferably committed to the cause of women or who have experience in social work or have legal knowledge; and iii) External member: 1 member from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment. At least one-half of the members of the IC are required to be women.

Complaint

Any woman who alleges to have been subjected to any act of Sexual Harassment at the workplace may make a complaint to the IC. The aggrieved woman may request the IC to provide reasonable assistance for making the complaint in writing. In case the complainant is under any physical or mental incapacity, the complaint can be made by the legal heir or any other person authorized in writing by the complainant.

The complaint should be made in writing or via email to the IC as soon as possible, not later than 15 days from the date of occurrence of the incident alleged to constitute Sexual Harassment (in case of a series of incidents, within a period of 15 days from the date of the last incident). The IC may extend the time limit, not exceeding 1 month, if it is satisfied that there were unavoidable circumstances which prevented the aggrieved woman from filing a complaint within the said period.

Hard-copy complaints should be submitted to the director of HR and email complaints should be sent to **hr@jaynix.com / hr.nsk@jaynix.com**. All complaints, whether in hard-copy or email form, should be clear and should include details of the incident or incidents, supporting documents, names of individuals involved and the names and addresses of the witnesses. On receipt of the complaint, the IC shall send one of the copies received from the aggrieved woman to the respondent within a period of 7 working days. The respondent shall file a reply to the complaint along with a list of documents, and names and addresses of witnesses, within a period not exceeding 10 working days from the date of receipt of the complaint.

If the complainant would like to initiate action under the Indian Penal Code, 1860, she may inform the IC of the same, and the Company shall provide necessary assistance to file such a complaint.

Conciliation

Before the IC initiates an inquiry into the complaint, the complainant may request the IC to settle the matter between the complainant and the respondent through conciliation before initiating an inquiry. However, no monetary settlement shall be made on the basis of the conciliation. In the event a settlement has been reached, a further inquiry shall not be conducted.

Inquiry

All claims of Sexual Harassment will be promptly and thoroughly investigated by the IC in accordance with the principles of natural justice and the provisions of law. Neither the complainant nor the respondent shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.

In the event that the complainant or respondent fails to appear before the IC without sufficient cause for 3 consecutive hearings, the IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complainant.

