PHOENIX INTERNATIONAL LIMITED

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POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

[Pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013]

1. Objective

Phoenix International Limited (the "Company") is committed to providing a safe and respectful work environment free from sexual harassment. This Policy is framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act") and the rules made thereunder.

2. Scope

This Policy applies to all women employees, whether permanent, temporary, contractual, trainees or apprentices, and to women visitors, at all workplaces of the Company, including its registered office at New Delhi, its manufacturing unit at Chennai, and any place visited by an employee arising out of or during the course of employment, including transportation provided by the Company.

3. Sexual harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication: physical contact and advances; a demand or request for sexual favours; making sexually coloured remarks; showing pornography; or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Implied or explicit promise of preferential treatment, threat of detrimental treatment, interference with work, or creation of an intimidating, offensive or hostile work environment in connection with such acts shall also amount to sexual harassment.

4. Internal Committee

The Company has constituted an Internal Committee ("IC") at each office or unit having ten or more employees, in accordance with Section 4 of the Act, consisting of a Presiding Officer who shall be a senior woman employee, at least two employee members, and one external member from an NGO or a person familiar with issues relating to sexual harassment. At least one-half of the members shall be women. The members shall hold office for a period not exceeding three years. The names and contact details of the IC members are displayed at each workplace.

5. Complaint and inquiry procedure

An aggrieved woman may make a written complaint to the IC within three months of the incident (or of the last incident, in case of a series). The IC may extend the time limit by a further three months for reasons recorded in writing.

Before initiating an inquiry, the IC may, at the request of the complainant, take steps to settle the matter through conciliation, provided no monetary settlement is made the basis of conciliation.

The IC shall complete the inquiry within ninety days, following the principles of natural justice, and submit its report to the employer within ten days of completion.

During the pendency of the inquiry, the IC may, on written request of the complainant, recommend interim relief such as transfer or grant of leave.

Where the allegation is proved, the IC shall recommend action in accordance with the service rules, which may include written apology, warning, withholding of promotion or increment, termination, and deduction of compensation from wages. The employer shall act upon the recommendation within sixty days.

6. Confidentiality and protection against retaliation

The identity and address of the complainant, respondent and witnesses, and the contents of the complaint, inquiry proceedings and recommendations shall not be published or made known to the public, in accordance with Section 16 of the Act. The Company shall ensure that no complainant or witness is victimised or discriminated against.

7. False or malicious complaints

Where the IC concludes that a complaint was made with malicious intent or using forged or misleading documents, it may recommend action against the complainant in accordance with Section 14 of the Act. Mere inability to substantiate a complaint or provide adequate proof shall not attract action.

8. Awareness and reporting

The Company shall organise awareness programmes for employees and orientation programmes for IC members. The IC shall prepare an annual report and submit it to the employer and the District Officer. The number of complaints received and disposed of during the year shall be disclosed in the Board's Report.