

ARSHIYA LIMITED

CIN: L93000MH1981PLC024747

POLICY ON SEXUAL HARASSMENT



1. OBJECTIVE:

- To foster a professional, open and committed workplace free of harassment, Arshiya and all its group companies, (hereinafter collectively referred to as the Company) aims at providing a working environment which is free of any kind of harassment or intimidation.
- The company is strongly committed to a workplace that is free of all unlawful discrimination by providing a healthy working environment that enables employees to contribute their best without fear of prejudice, gender bias and sexual harassment.
- The company recognizes that sexual harassment violates fundamental rights in respect of gender equality, right to life and liberty and right to work with human dignity. The company also believes that all its employees have the right to be treated with dignity. Sexual harassment at the workplace or at any other place involving its employees is a grave offence and therefore, it is necessary that severe punishment is meted out to serve as a deterrent.
- To meet this objective, all measures shall be taken to avoid, eliminate and, if necessary, impose punishment for any act related to sexual harassment, which includes unwelcome sexually determined behavior, whether directly or by implication.

2. INTRODUCTION:

- The Company's quest for competitive excellence consists of commitment to lawful and ethical conduct adhering to Company's values. Integrity, honesty and mutual respect amongst employees will remain one of the core values of the Company.
- The Company is committed to provide a safe and conducive work environment to its employees and expects them to combine "Expertise with responsibility". Towards this it is essential that each employee deals with his/her colleagues and third parties with full fairness and respect and realizes that his/her behavior will be attributed to the Company and can affect its inward and outward reputation.
- Every employee has the right to be protected against harassment, regardless of
 whether the employee charged with the alleged offence considers his or her own
 behavior to be normal or acceptable and of whether the harassed person had the
 opportunity to avoid the harassment. This policy has been framed to prohibit,
 prevent or deter the commission of acts of sexual harassment at workplace and
 to set out the procedure for the redressal of complaints pertaining to sexual
 harassment.



3. SCOPE:

- This policy shall apply to all the employees present and future. Employee for the purpose of this policy shall mean any person who is on the rolls of the Company and this policy will be applicable at all establishment of the Company or when representing the Company outside office premises (while on assignment).
- Where Sexual harassment occurs to an employee as a result of an act by a third party or outsider while on official duty, the Company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

4. WHAT CONSTITUTES SEXUAL HARASSMENT?

- Sexual Harassment is an act which is emotionally abusive and which creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment may be classified into two categories: "Hostile Environment" and "quid pro quo"
- "Hostile Environment" means a situation where the sexually-oriented conduct of one employee creates an offensive and unpleasant working environment for any other employee. Harassment is often about one person (or a group of people) using power inappropriately to dominate over another person/group of people. An act of harassment may also be committed between people when there is no power relationship. Any conduct which is humiliating constitutes health and safety problem. Any act which would disadvantage the affected employee in connection with his or her employment, including promotion would constitute a hostile working environment.
- A hostile work environment would also arise when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and perceived as an attack on personal dignity.
- "Quid pro quo" (this for that) harassment is a situation when decisions regarding employment are promised, threatened or given, based upon whether or not one or more employees will submit to sexually-oriented conduct.
- "Sexual Harassment" shall mean and include, but is not limited to the following:
 - Unwelcome sexual advances, request or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
 - ii. Unwelcome sexual advances involving verbal, non-verbal communication or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, email, gestures, showing of pornography, lurid stares, physical



- contact or molestation, stalking, sounds, display of pictures, signs, communication which offends the individual's sensibilities and affects his/her performance;
- iii. Publication or exhibition of any advertisement which contains indecent representation of women in any form, publication or sending by post any book, pamphlet, paper, slide, film, writing, drawing, painting, photograph, representation or figure which contains indecent representation of women in any form;
- iv. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- v. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the opposite sex;
- vi. Any unwelcome gesture by an employee having sexual overtones.
- Sexual harassment can occur between an employee and a co-worker, supervisor, manager, agent, consultant or contractor and include personnel engaged through contractor / vendor at workplace or outside in relation to an employee of the Company or vice versa during the course of employment.

5. CONSTITUTION OF COMMITTEE TO PREVENT AND DEAL WITH SEXUAL ` HARASSMENT:

- **5.1.** The Company shall establish a Committee to deal with complaints with respect of Sexual Harassment which will be known as "Committee for Redressal of Complaints against Sexual Harassment (CRCSH)".
- **5.2.** The committee shall consist of 6 (six) members of which three shall be female members and three shall be male members. The term of office of the members of the Committee shall be 2 (two) years. Provided, however that a person shall cease to hold office as a member of the Committee if he or she ceases to be an employee of the Company. The committee members will appoint a chairperson, who must be a female member, for a period of 2 (two) years from the date of formation of the committee.
- **5.3.** The names email ID and the contact numbers of the Committee members are mentioned in Annexure I.

6. POWERS AND DUTIES OF CRCSH:

- **6.1.** To ensure implementation of this Policy;
- **6.2.** To ensure and supervise the proper constitution and functioning of the Committee;
- **6.3.** To formulate programmes for spreading awareness of the policy amongst the employees;
- **6.4.** To conduct enquiries, arrange for investigation, maintain records & reports and initiate appropriate action against the alleged employee.



7. TERMS OF THE FUNCTIONING OF CRCSH:

- **7.1.** A person shall be disqualified from being a member of the Committee if there is any complaint concerning sexual harassment pending against him/her or if he/she is found guilty of sexual harassment.
- **7.2.** If a member of the Committee remains absent without permission of the Chairperson for three consecutive meetings, his/her office shall thereupon become vacant.
- **7.3.** A member of the Committee may resign from his/ her office at any time by tendering his/ her resignation in writing to the Chairperson and such person shall be deemed to have vacated his/ her office as soon as the Chairperson accepts the resignation.
- **7.4.** A member of the committee shall cease to be a member when he/she resigns from the company.
- **7.5.** The Committee shall meet at least twice every year and six months shall not intervene between two successive meetings.

8. COMPLAINT – PROCESS AND PROCEDURE:

If any employee is affected by harassment, he/she must:-

- a. Inform the alleged employee that his/her behavior is unwelcome and ask him/her to stop such behavior;
- b. Keep a record of incidents (dates, times, locations, possible witnesses, details of the incident, how it was responded etc.). It is not mandatory to have a record of events to lodge a complaint, but a record can strengthen the case and help the affected employee to remember the details at a later date, in case the complaint is not filed immediately;
- c. File /lodge a complaint as soon as possible. If, after asking the alleged employee to stop his/her behavior, the harassment continues, report the abuse to the Complaints Committee for this purpose;
- d. It is the obligation of all employees to personally report about sexual harassment. A concerned co-worker may also inform the committee of any instance or behavior of sexual harassment by a co-worker towards another employee;
- e. The concerned employee shall give his complaint in writing to the chairperson of the committee giving details of the incident within a week of its occurrence;
- f. Once the Complaint is lodged/filed, it will be kept strictly confidential;
- g. The alleged employee will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated;



- h. The committee shall ensure that a fair and just investigation is undertaken immediately;
- i. Both the Complainant and the alleged employee initially will be questioned separately with a view to ascertain the veracity 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;
- j. The Complainant and the alleged employee shall be informed of the outcome of the investigation. The investigation shall be completed within 15 (fifteen) days from the date of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, appropriate disciplinary action will be initiated against the alleged employee;
- k. The Complainant / affected employee has the option to seek transfer of the alleged employee or his/her own transfer and the Committee will take the final decision on this issue;
- I. In the event of the complainant or the alleged employee are in direct or indirect reporting channel of any member of the Committee, such member shall abstain from participating in enquiries related to such complaint.

9. DISCIPLINARY ACTION:

- Where the Committee finds that the alleged employee is guilty of misconduct, appropriate disciplinary action shall be taken against the alleged employee. Disciplinary action may be either minor or major penalties. This action shall be in addition to any legal recourse that may be pursued by the complainant.
- In the event, the complainant/ affected employee want to initiate any legal action against the alleged employee(s); the Committee shall assist such Complainant in all possible manners.

10. GRIEVANCE PROCEDURE (HO/HUB & SITE LOCATION):

- **10.1.** Any affected employee will have a right to lodge a complaint concerning sexual harassment against an employee or an outsider with any of the members of the Committee. The CRCSH will be based out of Mumbai. A complaint outside Mumbai can be reported to the respective HR Representative or respective committee member as mentioned in Annexure II.
- **10.2.** Such a complaint shall be in writing and it shall be lodged within 15 days from the date of occurrence of the alleged incidents;
- **10.3.** If the Complaint is oral, the same shall be reduced in writing in detail by the committee member or HR Representative or respective committee member as mentioned in Annexure II to whom the complaint is made & the committee member or HR Representative shall make an entry of the complaint in the complaint register maintained for the said purpose;



- **10.4.** The Complainant will be afforded full confidentiality at this stage;
- **10.5.** If the complaint is made directly to a member of CRCSH, immediately upon receipt of the Complaint, and within not more than 2 (two) working days, the

Member of the Committee to whom the Complaint is made shall communicate the complaint to all the members of the Committee;

10.6. Within a period of 5 (five) working days from the date of such communication, the Chairperson shall convene a meeting of the Committee. This meeting may be

held through video conferencing as well in the event of the parties are located at various locations. At this meeting, the Committee shall nominate 3 (three) persons from amongst themselves (hereinafter referred to as Enquiry Committee) for proceeding with the Complaint:

10.7. If the complaint is made directly to the HR Representative or respective committee member as mentioned in Annexure – II in locations outside Mumbai, within not more than 2 (two) working days, the HR Representative shall communicate the compliant to all the members of the SHC. The HR Representative will formulate a local enquiry committee* of 3 (three) people, comprising minimum one female employee & one male employee.

11. PROCEDURE FOR INITIATING ACTION:

- **11.1.** Within 5 (five) working days of the Enquiry Committee being set up, the said Committee will convene a meeting of which advance intimation will be given to the Complainant. This meeting can be held through video conferencing as well in case the parties are located at distant locations.
- **11.2.** At this meeting, the Complainant will be entitled to remain present personally or through a representative, provided the enquiry committee approves of the representation of a person on behalf of the complainant.
- **11.3.** At the first meeting of the Enquiry Committee, the Complainant or his/her representative shall be heard and the Enquiry Committee shall decide whether the Complaint requires to be proceeded with. The Complaint will be dropped only if the Complaint on the face of it, does not disclose an offence of sexual harassment.
- **11.4.** In case the Enquiry Committee decides to proceed with the Complaint, the alleged employee will be called before the Enquiry Committee to answer the charges. Upon hearing the response of the alleged employee the enquiry committee shall decide and proceed to award either a minor or a major punishment.
- **11.5.** At Non HO locations, the local enquiry committee will consult and take approval of CRCSH before awarding any major punishment.

12. PUNISHMENT AND PENALTIES:



An employee guilty of sexual harassment shall be liable to be punished with any of the following disciplinary actions / penalties which are classified as under:

Classification of Penalties:-

The penalties shall be classified as minor and major penalties as under:

Minor:

- a. Reprimand,
- b. Warning,
- c. Censure, or
- d. Withholding of an increment not exceeding one year

Major:

- a. Withholding of increment for more than 1(one) year,
- b. Demotion,
- c. Termination of Service

Any other punishment which the Committee may deem fit and proper

In case a minor penalty has been imposed on the alleged employee on an earlier occasion, on a second conviction, he/she shall be liable to be punished with a major penalty irrespective of the gravity of the second offence.

At all times, the provisions of the THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT OF 2013 and / or any amendments to the Penalties and Punishments through the Law of the land would automatically apply.

In addition to the above penalties, a monetary fine may also be imposed on the employee concerned as may be decided by the committee. This amount will be used by the Management for achieving the aims and objectives of this policy.

Provided however that, in addition to all these penalties, the employee shall be required to give a written apology to the affected employee and upon his/her failure to do so, the punishment may be enhanced at the discretion of the Committee.

13. PROCEDURE FOR IMPOSING MINOR PUNISHMENT:

In case the Enquiry Committee decides to impose a minor punishment, the alleged employee shall be given an opportunity to explain within one week why he/she should not be be punished for the act of sexual harassment on his/her part. The nature and quantum of punishment, if any, to be imposed on him/her shall be decided after considering the explanation, if any, given by the alleged employee



14. PROCEDURE FOR IMPOSING MAJOR PUNISHMENT:

- **14.1**. If an alleged employee is held to be guilty of sexual harassment and if there is reason to believe that the allegation is true, the Enquiry Committee shall first decide whether to place the alleged employee under suspension or not.
- **14.2.** If an alleged employee is charged with physical molestation in the Company premises, he/she shall be immediately placed under suspension pending the completion of the investigation and enquiry. In all other cases, the Enquiry Committee shall within 3 (three) days decide whether the alleged employee shall be placed under suspension or not and in either event it shall communicate its decision and the reasons for the decision to the Management, which shall then implement the decision forthwith.
- **14.3.** Within 3 (three) days of the first meeting of the Enquiry Committee, it shall communicate to the alleged employee by hand delivery duly acknowledged or by registered post acknowledgement due or by email, the statement of allegations and demand from him/her a written explanation within 7 (seven) days from the date of receipt of the statement of allegations.
- **14.4.** If the Enquiry Committee finds the explanation of the alleged employee to be not satisfactory or if no explanation is given by the alleged employee, the Enquiry Committee shall decide on the appropriate punishment & proceed with implementation of the same. The enquiry committee shall also communicate the decision to the complainant.
- **14.5.** The meetings of the Enquiry Committee will be held during the office hours in the company premises.

15. REGISTERING A COMPLAINT:

- **15.1.** This Policy is aimed at encouraging any employee who feels that he/she has been harassed to redress their complaint by contacting their immediate reporting manager or an HR representative or a member of the CRCSH. The Company recognizes that comments and behaviour which do not offend one person can offend another. The Management accepts that individuals may react differently to a particular incident and expects this right to be generally respected.
- **15.2.** Any complaint or report of sexual harassment will be dealt with promptly, seriously and sympathetically. All complaints will be investigated thoroughly, impartially and confidentially. Managers and supervisors must act immediately on any reports of sexual harassment. Employees will not be disadvantaged in their employment conditions or opportunities as a result of lodging a complaint.

16. MANAGER AND EMPLOYEE RESPONSIBILITIES:



The Company has a responsibility to prevent sexual harassment, therefore, managers and supervisors have a responsibility to:

- Monitor the working environment to ensure acceptable standards of conduct are observed at all times;
- Treat all complaints seriously and take immediate action to investigate and resolve the matter;
- Refer complaints to Chairperson of the Committee if they do not feel they are the best person to deal with the case (e.g. if there is a conflict of interest or if the complaint is particularly complex or serious)

17. ALL EMPLOYEES HAVE A RESPONSIBILITY TO:

- Comply with the Company's Sexual Harassment Policy;
- Offer support to the affected employee who is a victim of harassment and let them know where they can get help and advice (they should not approach the alleged employee);
- Maintain complete confidentiality if they provide information during the investigation of a complaint (employees who spread gossip or rumours may

expose themselves to defamation action/major punishment).

18. CONFIDENTIALITY:

All information received shall be kept confidential. Any person (including witnesses) who breach confidentiality shall be liable for disciplinary action.

19. PROTECTION AGAINST RETALIATION:

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the committee shall ensure that the Complainant or the witnesses are not victimized or discriminated against by the alleged employee. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the alleged employee against the complainant while the investigation is in progress should be reported by the Complainant to the CRCSH as soon as possible. Disciplinary action will be taken by the CRCSH against any such complaints which are found genuine.

20. DOCUMENTATION:



The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof.

21. DISSEMINATION OF THE POLICY:

A copy of this policy shall be made available to all employees and to all new recruits through the online SAP Employee Portal.

22. COMPLAINTS MADE WITH A MALICIOUS INTENT:

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, the employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual, tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the Complainant.

23. OTHER POINTS TO BE CONSIDERED:

- The committee may recommend to the Head HR, about the action which may include transfer or any of the other appropriate disciplinary action;
- The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the policy;
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the complainant by supporting any preventive action;
- The Committee shall analyze and put on record all complaints of this nature at the end of the year for submission to Head HR;
- In case the Committee finds the degree of offence coverable under any law, then
 this fact shall be mentioned in its report and appropriate action shall be mentioned
 in its report and appropriate action shall be initiated by the Management, for lodging
 a police complaint.

24. AMENDMENTS:

Any changes in the applicable State and National Laws would automatically apply for all cases of Harassment.



25. Annexures I:

Committee for Redressal of Complaints against Sexual Harassment:

Internal Committee members for Arshiya Limited- Ceejay House

| SI. No | Post of Committee | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|-------------------|-------------------|-------------|---------------|----------------------|
| • | Members | | | | |
| | | | Joint | | |
| | Presiding | Mrs. Archana Ajay | Managing | | archana.mittal@ars |
| 1 | Officer | Mittal | Director | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | | Vice | | |
| | | Mr. Navnit | President- | | navnit.choudhary@ |
| 3 | Member | Choudhary | Commercial | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Present Members of the Regional Committee:

Internal Committee members for Arshiya Limited- Panvel

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-------------------|-------------|---------------|----------------------|
| | | | Joint | | |
| | Presiding | Mrs. Archana Ajay | Managing | | archana.mittal@ars |
| 1 | Officer | Mittal | Director | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | | Vice | | |
| | | Mr. Navnit | President- | | navnit.choudhary@ |
| 3 | Member | Choudhary | Commercial | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Logistics Services Limited- Ceejay House

| S | I. | Post of | | | | |
|---|----|-----------|----------------------|-------------|----------------------|-----------|
| N | lo | Committee | Employee Name | Designation | Mobile Number | E-mail ID |
| | | Members | | | | |



| | Presiding | Mrs. Archana Ajay | Authorized | | archana.mittal@ars |
|---|-----------|-------------------|------------|------------|----------------------|
| 1 | Officer | Mittal | Signatory | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Logistics Services Limited-Panvel

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|------------------|-------------|---------------|----------------------|
| | Presiding | Mrs. Archana | Authorized | | archana.mittal@ars |
| 1 | Officer | Ajay Mittal | Signatory | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Lifestyle Limited – Ceejay

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|------------------|-------------|---------------|----------------------|
| | Presiding | Mrs. Archana | Authorized | | archana.mittal@ars |
| 1 | Officer | Ajay Mittal | Signatory | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Lifestyle Limited – Panvel



| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-------------------|-------------|---------------|----------------------|
| | Presiding | Mrs. Archana Ajay | Authorized | | archana.mittal@ars |
| 1 | Officer | Mittal | Signatory | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Rail Infrastructure Limited – Ceejay

| SI. No | Post of Committee | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|-------------------|---------------|-------------|---------------|----------------------|
| • | Members | | | | |
| | Presiding | Mrs. Archana | Authorized | | archana.mittal@ars |
| 1 | Officer | Ajay Mittal | Signatory | 9820247753 | hiyalimited.com |
| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | Mrs. Reena | External | | twinklemodelhouse |
| 4 | Member | Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Rail Infrastructure Limited – Aerocity

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-----------------------------|-------------------------------------|---------------|---------------------------------------|
| 1 | Presiding Officer | Mrs. Archana Ajay Mittal | Authorized Signatory | 9820247753 | archana.mittal@ars hiyalimited.com |
| 2 | Member | Ms. Sonam Rawat | Asst. Manager – Sales Support | 9899235330 | sonam.rawat@arshiy alimited.com |



| | | | Sr. VP – | | |
|---|----------|----------------|------------|------------|---------------------|
| | | | Business | | |
| | | | Developmen | | amit.gupta@arshiyal |
| 3 | Member | Mr. Amit Gupta | t | 9582140591 | imited.com |
| | | | Senior | | |
| | | Mr. Himanshu | Manager- | | himanshu.gupta@ar |
| 4 | Member | Gupta | HR | 8859188591 | shiyalimited.com |
| | External | Mrs. Reena | External | | Twinklemodelhouse |
| 5 | Member | Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Industrial Distribution Hub Limited— Ceejay

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|--------------------|-------------|------------------|----------------------|
| | Presiding | Mrs. Archana Ajay | | | archana.mittal@ars |
| 1 | Officer | Mittal | Director | 9820247753 | hiyalimited.com |
| | | | Company | | ratika.gandhi@arshiy |
| 2 | Member | Mrs. Ratika Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Industrial Distribution Hub Limited—Khurja

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-----------------------------|-------------------------------------|---------------|---------------------------------------|
| 1 | Presiding Officer | Mrs. Archana Ajay Mittal | Director | 9820247753 | archana.mittal@ars hiyalimited.com |
| 2 | Member | Ms. Sonam Rawat | Asst. Manager – Sales Support | 9899235330 | sonam.rawat@arshiy alimited.com |



| | | | Sr. VP – | | |
|---|----------|------------------|------------|------------|---------------------|
| | | | Business | | |
| | | | Developmen | | amit.gupta@arshiyal |
| 3 | Member | Mr. Amit Gupta | t | 9582140591 | imited.com |
| | | | Senior | | |
| | | Mr. Himanshu | Manager- | | himanshu.gupta@ar |
| 4 | Member | Gupta | HR | 8859188591 | shiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 5 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Industrial Distribution Hub Limited— Delhi

| SI. | Post of | | | | |
|-----|-----------|-------------------|---------------|---------------|----------------------------|
| No | Committee | Employee Name | Designation | Mobile Number | E-mail ID |
| • | Members | | | | |
| | Presiding | Mrs. Archana Ajay | | | archana.mittal@ars |
| 1 | Officer | Mittal | Director | 9820247753 | hiyalimited.com |
| | | | Asst. | | |
| | | | Manager – | | a a mana manuat @ a malain |
| | | | Sales Support | 0000005000 | sonam.rawat@arshiy |
| 2 | Member | Ms. Sonam Rawat | | 9899235330 | alimited.com |
| | | | Sr. VP – | | |
| | | | Business | | |
| | | | Developmen | | amit.gupta@arshiyal |
| 3 | Member | Mr. Amit Gupta | t | 9582140591 | imited.com |
| | | | Senior | | |
| | | Mr. Himanshu | Manager- | | himanshu.gupta@ar |
| 4 | Member | Gupta | HR | 8859188591 | shiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 5 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Northern FTWZ Limited— Ceejay

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-------------------|-------------|---------------|--------------------|
| | Presiding | Mrs. Archana Ajay | | | archana.mittal@ars |
| 1 | Officer | Mittal | Director | 9820247753 | hiyalimited.com |



| | | Mrs. Ratika | Company | | ratika.gandhi@arshiy |
|---|----------|------------------|-----------|------------|----------------------|
| 2 | Member | Gandhi | Secretary | 9833099013 | alimited.com |
| | | Mr. Navnit | | | navnit.choudhary@ |
| 3 | Member | Choudhary | Director | 9323113203 | arshiyalimited.com |
| | External | | External | | twinklemodelhouse |
| 4 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Northern FTWZ Limited–Khurja

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-------------------|-------------------------------------|---------------|------------------------------------|
| | Presiding | Mrs. Archana Ajay | | | archana.mittal@ars |
| 1 | Officer | Mittal | Director | 9820247753 | hiyalimited.com |
| 2 | Member | Ms. Sonam Rawat | Asst. Manager – Sales Support | 9899235330 | sonam.rawat@arshiy alimited.com |
| | Wichiber | 1VIS. Sonam Navat | Sr. VP – | 303323330 | difffica.com |
| | | | Business Developmen | | amit.gupta@arshiyal |
| 3 | Member | Mr. Amit Gupta | t | 9582140591 | imited.com |
| | | Mr. Himanshu | Senior Manager- | | himanshu.gupta@ar |
| 4 | Member | Gupta | HR | 8859188591 | shiyalimited.com |
| | External | | External | | Twinklemodelhouse |
| 5 | Member | Mrs. Reena Mirza | Member | 7016732614 | @gmail.com |

Internal Committee members for Arshiya Northern FTWZ Limited-Delhi

| SI. No | Post of Committee Members | Employee Name | Designation | Mobile Number | E-mail ID |
|-----------|---------------------------------|-----------------------------|-------------------------------------|---------------|---------------------------------------|
| 1 | Presiding Officer | Mrs. Archana Ajay Mittal | Director | 9820247753 | archana.mittal@ars hiyalimited.com |
| 2 | Member | Ms. Sonam Rawat | Asst. Manager – Sales Support | 9899235330 | sonam.rawat@arshiy alimited.com |



| | | | Sr. VP – | | |
|---|----------|----------------|------------|------------|---------------------|
| | | | Business | | |
| | | | Developmen | | amit.gupta@arshiyal |
| 3 | Member | Mr. Amit Gupta | t | 9582140591 | imited.com |
| | | | Senior | | |
| | | Mr. Himanshu | Manager- | | himanshu.gupta@ar |
| 4 | Member | Gupta | HR | 8859188591 | shiyalimited.com |
| | External | Mrs. Reena | External | | Twinklemodelhouse |
| 5 | Member | Mirza | Member | 7016732614 | @gmail.com |

26. FREQUENTLY ASKED QUESTIONS:

1. What types of behavior constitute sexual harassment?

Depending on the circumstances, each of the following kinds of behavior may be deemed to be sexual harassment:

- Material that is sexual in nature, , sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer or fax machine or on the Internet or any other public display system or public place in the work premises
- Verbal abuse or comments that put down people because of their sex
- Comments about people's (women/men) bodies
- Tales of sexual exploitation
- Graphic descriptions of pornography
- Insist on going out on a date
- Sexually explicit gestures
- Unwelcome touching and hugging
- Sexist and insulting graffiti
- Sex related jokes and cartoons. There is a difference between harmless humor
 which may refer to gender, race and so on and using a racist, sexist or other types of
 stereotyping jokes to have a "dig" at someone (and therefore to
 harass them). If this difference is not clear or if someone is offended, the behavior
 should stop immediately
- Obscene phone calls
- Displaying pornography in the workplace
- Insisting that workers wear revealing clothing
- Inappropriate gifts (for example, lingerie etc.)
- Discussion of one's partner's sexual inadequacies
- Lewd and threatening letters
- "Accidentally" brushing sexual parts of the body



- Pressing or rubbing up against a victim
- Sexual sneak attacks (such as grabbing private parts on the run)
- Indecent exposure
- Subtle or overt pressure for sexual favors
- Soliciting sexual services
- Demanding sexual services
- Sexual or physical contact, such as slapping, kissing or touching.
- Intrusive questions about sexual activity
- Sexual assault (a crime as well, of course, under the Indian Penal Code)
- Repeated sexual invitations when the person invited has refused/ignored similar invitations
- Coerced sexual intercourse (e.g., as a condition of employment or academic status). In some cases, a single act may be enough to amount to harassment.

2. If an employee complies, does that make it consensual sex instead of harassment?

No, not necessarily. If the sexual advances were "unwelcome", but the employee complied in order to keep his or her job; it is still considered harassment. However, if an ongoing relationship develops, it often becomes more difficult - as a matter of evidentiary proof - to convince the Committee that the original advances were "unwelcome".

3. Can one incident constitute sexual harassment?

One incident can constitute a sexual harassment provided it falls under the broad definition of sexual harassment in the policy. However, there are two general types of sexual harassment as mentioned below.

- i. In "quid pro quo" cases, a single sexual advance may constitute harassment if it is linked to the granting or denial of a tangible employment action, such as discharge, demotion or undesirable reassignment or other changes in employment or employment benefits.
- ii. In "hostile environment" cases, generally, a single incident does not create a "hostile environment." A hostile environment claim usually requires a showing of a pattern of offensive conduct; the more extreme the conduct, the less the need to show a repetitive series of incidents.

4. What are my responsibilities as an employee?

 All employees including Contract employees, third parties and consultants are required to comply with the rules of the Company prohibiting sexual harassment.



- More specifically you are required to refrain from sexually oriented behavior
 while interacting with other employees. It may be noted that the acts such
 as teasing, sporadic abusive utterances, occasional
 sexually colored jokes, could upset a person, even though it may not have been
 intentionally directed at him/her, and may not form a sexual harassment claim.
 If the censurable behavior you are engaging in, is upsetting someone, stop it
 immediately and refrain from future indulgences in such behavior.
- Additionally you are required to report all incidents of sexually oriented behavior that you are aware of, to the appropriate persons
