

PREVENTION OF SEXUAL HARASSMENT POLICY

Purpose & Scope:

PHONOGRAPHIC PERFORMANCE LIMITED (herein referred to as PPL or the 'Company') is committed to provide equal employment opportunities, i.e., no discrimination based on age, race, colour, religion, national origin or gender. All Employees are entitled to a work-environment free from sexual intimidation and one which promotes dignity, respect and affordable equitable treatment. PPL ensures promoting a work environment that is conducive to professional growth of all the employees and encourages equal opportunity to all.

Objectives:

Provide a framework enabling creation of Work environment free from fear, reprisal, coercion, discrimination and harassment of sexual nature. Expressing zero tolerance to any Sexual Harassment at Workplace through Prevention, Resolution and Deterrence of acts of Sexual Harassment.

Applicability:

This Policy applies to all individuals who are employed in the Company, either engaged in permanent, contractual or temporary capacity (whether in the office premises or in any office which includes regional/ branch/ etc.) of PPL.

This Policy also applies to the harassment of/ by vendors and clients of the Company depending on the merit of the case which affect business interest of the company.

Definitions:

A. Sexual Harassment

Sexual Harassment may be one or a series of incidents involving unsolicited and unwelcome behaviour (whether directly or by implication) towards a co- worker/ subordinate / supervisors/ third party personnel involving, but not limited to, any of the following:

Physical contact or unwelcome advances

Demand or request for sexual favours

Sexually coloured remarks

Showing pornography or other obscene material. This includes circulation/displaying of potentially offensive sexually oriented content in the Workplace

Any other unwelcome physical, verbal or non - verbal conduct of sexual nature like jokes/comments/pranks/compliment/conversations causing or likely to cause awkwardness or embarrassment; Innuendo and taunts of sexual nature;

Physical confinement against one's will and likely to intrude upon one's privacy; or sexual assault;

Sounds, gestures, staring, leering, gender based insults or sexist remarks, sexual overtone in any manner such as over telephone/mobile, SMS, Email and includes any act or conduct by a person and belonging to one sex which denies or would deny equal opportunity in pursuit of employment / retention / career development or otherwise making the environment at the Workplace hostile,



humiliating or intimidating to person belonging to the other sex;

Un-welcome propositions/requests for sexual activity.

Certain other Factors to define Sexual Harassment:

The following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment

Implied or explicit promise of preferential treatment in her employment, or Implied or explicit threat of detrimental treatment in her employment, or Implied or explicit threat about her present or future employment or Humiliating treatment likely to affect her health or safety.

Internal Complaints Committee:

PPL has in place Internal Complaints Committee for the purpose of conducting enquiry in the matter of Sexual Harassment.

PPL has offices or administrative units of the Workplace located at different places or divisional or sub divisional level, the Internal Complaints Committee shall be constituted at the Head Office. This Internal Complaints Committee shall comprise of the members as mentioned below:

Composition of Internal Complaints Committee:

| Membership | Name & Designation |
|--------------------|---|
| Presiding Officer | Florine Pinto, VP - Finance |
| Committee Member 1 | Viral Gandhi, GM – Ease of doing business |
| Committee Member 2 | Shailesh Kripal - Sr. Manager – Revenue Assurance |
| Committee Member 3 | Debasmita Patra- Manager Corporate Sales |
| External Member | Sharmila Kher, POSH Consultant |

The Presiding Officer and every other Members of the Internal Complaint Committee shall hold office for a period not exceeding three years, from the date of their nomination.

The decision of Apex management will be binding and final basis on the recommendations made by the Internal Complaints Committee after a fair investigation of any case of Sexual Harassment if proved specifically.

Action by Harassed Staff Member:

In the first instance, when a Staff member observes behaviour of Sexual Harassment, the harassed Staff member may (if wishes to) confront the harasser and bring it to his / her attention that the behaviour is unwelcome and firmly request it be stopped. If such behaviour persists, the harassed Staff member should bring it to the attention of an immediate senior or supervisor and/or Human Resources department of the office where he/she works, for immediate action.

Complainant may make in writing a complaint of Sexual Harassment at Workplace to the Internal Complaints Committee at posh@pplindia.org and file the complaint against his respondent to the HR of the company (as defined hereunder) within a period of three months from the date of incident and in

case of series of incidents, within a period of three months from the date of last incident. Delay in reporting makes it more difficult to establish the facts of the case and may contribute to the repetition of offensive behaviour

The Complainant must share equal number of copies of complaint to IC basis the number of IC members or should share an email on the aforementioned email. The Internal Committee may, for the reasons to be recorded in writing, extend the time limit for reporting the complaint to such periods

as it deems fit, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the said period.

Where such complaint cannot be made in writing, the Presiding Officer of the Internal Complaint Committee or any Member of the Internal Complaint Committee as the case may be, shall render all reasonable assistance to the Complainant for making the complaint in writing so as to facilitate the Internal Complaints Committee to take a formal action in this regard. Where the Complainant is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may make a complaint in writing to the Internal Complaint Committee.

Process of Enquiry:

The committee member on receiving a complaint will intimate the Presiding Officer. The Presiding Officer within a span of one week of receipt of the complaint should arrange for a meeting for discussing the complaint raised. The committee will ask the complainant to prepare a detailed statement of the incidents/allegations.

The committee will provide an opportunity to the Complainee to submit a written response to the statement of allegations and submit to the ICC within 10 days.

The Committee will maintain strict confidentiality and will organize verbal hearings with the complainant and the Complainee.

The Committee will take testimonials of other relevant persons and review the evidence whenever

necessary. The Committee should ensure that sufficient care is taken to avoid any retaliation against the witness. During the process, the complainant and the Complainee will be expected to refrain from any threat, intimidation or influencing the witness. The Committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidences and relevant statements. The Committee will ensure that both the parties are given reasonable opportunity to be heard along with witness and to produce any other relevant documents. The Committee will take steps to ensure a fair hearing and will have the power to ensure that the victim or witness are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the Committee will suggest appropriate interim recommendations in relation to an accused person including transfer, leave, change of work place location etc, to aggrieved employee. The Committee will investigate and prepare an enquiry report with recommendations within 90 calendar days. Upon Completion of the investigation, both parties will be informed of the results of the investigation.

Actions:

Once the investigation is done and findings are ready, a determination will be made regarding the



validity of the harassment allegations. If it is determined harassment has occurred: prompt, remedial action will be taken. The disciplinary actions could include but not limited to an apology letter, warning, reprimand or censure, increment withholding, Promotion withholding, termination from service.

Making a false complaint of Sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy. Violation of policy will call for strict disciplinary action up to and including termination basis the gravity of the complaint filed.

Annual Report:

The Internal Compliant Committee shall prepare an annual report giving a full account of its activities in details and submit it before the Board of Directors of the Company and forward a copy to the Commissioner of Labour as per the Act. The report should have the details as follows:

- Number of complaints of Sexual Harassment received in this year
- Number of complaints disposed of during this year
- Number of cases pending for more than 90 days
- Number of workshops/ awareness programme being carried out
- Nature of action taken by the Employer

7. Confidentiality:

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

To protect the interest of the victim and / or the aggrieved person who reports incidents of Sexual Harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances. And if needed a NOA can be signed between both parties, Witnesses and IC.

This policy supersedes all earlier communication/policy with respect to Prevention of Sexual Harassment at work place. In case, of any dispute or difference of interpretation the decision of the CEO in the matter will be final and binding to all.