

SEXUAL HARASSMENT POLICY

(Approved by Board at its meeting held on November 8, 2019)

CAPRI GLOBAL CAPITAL LIMITED

CIN: L65921MH1994PLC173469

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1 Sexual Harassment

As a humane and progressive organization, Capri Global Capital Ltd. (“the Company”) is strongly committed to having a workplace that ensures Equal Employment Opportunity. The Company endeavors to ensure a congenial environment where employees can work without any inhibition and contribute their best without any fear or favor. The Company is committed to provide a work environment that is free of discrimination and unlawful harassment. The Company recognizes that sexual harassment violates fundamental rights of gender equality, right to life and liberty and right to work with human dignity guaranteed by the Constitution of India. To meet this objective, measures shall be taken to avoid, eliminate and if necessary impose punishment for any act of sexual harassment, which includes unwelcome sexually determined behavior.

It is our endeavor to embody and practice secularism and equality in all our practices. No one will be exploited or given undue preference due to his/her religion, caste, community, region, language, color or gender. This Policy is implemented to prevent an occurrence of discrimination on any of the above grounds and have a complaint mechanism to provide suitable solution to any such situation. The Policy applies to men and women; to similar and opposite gender relationships; to relationships between supervisors and subordinates; and to peer relationships. Our employees, customers, vendors, consultants, contract worker, trainee, apprentice and anyone else doing business on the Company's premises must comply with this Policy.

1.1. Definitions

- **“Complaint”** includes concern raised under this Policy.
- **“Complainant”** person who has raised a concern under this Policy.
- **“Complaints Committee”** means the Committee referred to in Clause 3 of this Policy.
- **“Harassment”** means any behavior that exhibits hostility or aversion towards an individual because of that person's race, color, religion, gender, national origin, age, disability, sexual orientation, or other protected characteristics.
- **“Sexual Harassment”** includes such unwelcome sexually determined behavior (whether directly or by implication) as:
 - a) physical contact and advances;
 - b) a demand or request for sexual favours;
 - c) unwelcome communications or invitations;
 - d) sexually coloured remarks;
 - e) showing pornography;
 - f) sexually determined behavior (direct or implied);
 - g) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Any form of sexual attention becomes harassment when it is ‘unwelcome’. Whether the perpetrator intentionally or unintentionally sexually harasses a person is not the issue. How the person, at whom it is directed, *receives* that behaviour is crucial because of the subjective nature of sexual harassment.

All complaints will be thoroughly investigated and will be treated with a manner of confidentiality consistent with the resolution of the problem. If the allegations are found to be true following investigation, appropriate corrective action will be taken and if required can lead to the discharge of the offending employee(s). If you believe you have been a victim of harassment, or know of another employee who has been, report it immediately. Employees can raise concerns and make reports

without fear of reprisal. Employees are encouraged to report to the management any incident of harassment they may witness. Retaliation against an individual for bringing or corroborating harassment or discrimination allegations is strictly prohibited, so long as such allegations or corroboration are made in good faith and are not knowingly false.

1.2. Scope

The Policy applies to men and women; to similar and opposite gender relationships; to relationships between supervisors and subordinates; and to peer relationships. Employees, customers, vendors, consultants, contract worker, trainee, apprentice and anyone else doing business on the Company's premises must comply with this policy.

Any such complaint received under the Sexual Harassment Policy will fall under the purview of the policy defined hereunder and will be dealt with accordingly.

1.3. Complaints Committee

The Policy mandates to form a 'Complaints Committee'. Minimum 5 employees from the panel listed below may be selected to address complaints raised. In any case of complaints raised, half of the Members of the Complaint Committee would be females, and the committee would be headed by a woman.

The 'Complaints Committee' will currently constitute of the following employees:-

- a. Ms. Divya Sutar- (Head – Culture & Talent Management)- will Chair the Committee (Lady & Presiding Officer)
- b. Mr. Hemant Dave (Operations Head) - Member
- c. Mr. Ashok Agarwal (Associate Director) - Member
- d. Ms. Kanika Suri (Rep 1-Lady) - Member
- e. Ms. Prachi Joshi (Rep 2-Lady) – External Member
- f. Ms. Neeta Joshi (Rep 3-Lady) - Member

To carry out the investigation, any 5 active Committee Members will form the quorum of the Committee (Women representation on panel will be more than 50% at any time, and the committee would always be headed by a female employee). Besides this the Complaints Committee will involve a third party, either NGO or other body who is familiar with the issue of sexual harassment.

1.4. Investigation Process

- The Complainant is required to provide a written complaint to any of the employees of the Complaints Committee at the earliest point of time and in any case within 15 days from the date of occurrence of the alleged incident. He/she may also contact his/her Reporting Authority or the Human Resources Department who will put him/her in touch with the Complaints Committee.
- The Complaint should contain all the material and relevant details concerning the alleged discrimination including the name of the contravener.
- The identity of the parties involved will be kept confidential by the Complaints Committee to the extent possible given the legitimate needs of law and the investigation.
- The Complaints Committee will hold an enquiry into the matter. The Committee would be entitled to elicit all forms of evidence in this regard and the concerned parties would be required to co-operate.

- Both parties will be given an opportunity to present their views to the Complaints Committee during the investigation process.
- After examination of the complaint, the Complaints Committee will submit its recommendation to the Management, based on which a decision will be taken.
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the employer and person in charge will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

1.5. Responsibility of the Complaints Committee

The Complaints Committee will make an annual report of the complaints and actions taken to the Government department concerned. The Committee and person in charge will also report on the compliance with the aforesaid guidelines including on the reports of the Complaints Committee to the Government department.

11.6 Retention of Documents

All complaints, in writing along with the results of investigation relating thereto shall be retained by the Management of the Company.

11.7 Employee Guidelines

The primary focus of this Policy is to ensure a congenial work environment that is free from threat or fear. There are a few things you can do to help translate the policy into day-to-day practices.

- Sexual harassment can take many forms: spoken, unspoken or physical. Recognize that you may be conditioned to accept behaviors that infringe on your rights and constitute discriminate or gender discrimination as normal workplace conduct.
- Firmly say NO. It is possible that the offender does not know that his/her behavior is unacceptable to you. Promptly make a direct statement and communicate that the offender's conduct is not acceptable to you.
- Participating in jokes and sexually tinged conversation is often taken as tacit permission to continue. Communicate early on that this conduct is unacceptable to you.
- Warn the offender to immediately desist, first orally and then if necessary, follow it up with a warning in writing.
- Assess the situation and appropriately time your complaint.
- If you are unsure of the course of action to take in a given situation, we encourage you to approach any of the Committee employees informally and take their counsel.
- We also encourage you to discuss any issues you may have in this area to your Supervisor/HR representative/any employee of the 'Complaints Committee'.
- If you believe you have been a victim of harassment, or know of another employee who has been, report it immediately. Employees can raise concerns and make reports without fear of reprisal. Employees are encouraged to report to the management any incident of harassment they may witness. Retaliation against an individual for bringing or corroborating harassment or discrimination allegations is strictly prohibited, so long as such allegations or corroboration are made in good faith and are not knowingly false.

11.8 Amendments to the Policy

This Policy shall be reviewed by the Board. Any changes or modification on the Policy would be presented for approval of the Board. The Board authorise Managing Director to make changes in the Policy due to regulatory or legal requirement and such changes made to be brought to the attention of the Board at the first meeting following the amendment.