

JAGATJIT AGRI ENGINEERING LIMITED

(formerly Jagatjit Agri Engineering Private Limited and Jagatjit Agri India Private Limited)

PREVENTION OF SEXUAL HARRASMENT AT WORKPLACE

JAGATJIT AGRI ENGINEERING LIMITED

CIN: U29300PB2020PLC051718

Registered Office: LUDHIANA MALERKOTLA ROAD, DEHLON, LUDHIANA, PUNJAB 141118, INDIA

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

A. Commitment

Our company, Jagatjit Agri Engineering Limited ("Company") is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment on the basis of their gender.

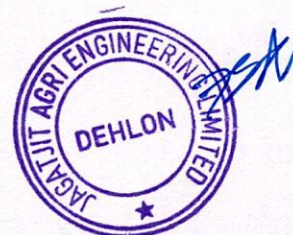
This Policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") and the rules framed thereunder. While this Policy covers all key aspects of the Act, in case of any conflict, the provisions of the Act shall prevail.

B. Scope

This policy applies to all categories of employees of the Company, including permanent employees, temporary employees, ad hoc basis, daily wage workers, contract labors, apprentices, trainees and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace. The Company will not tolerate sexual harassment, if engaged in, by any employee or co-worker of the Company, its clients or by suppliers or any other business associates.

C. Definitions :

1. **"Act"**: The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder.
2. **"Accused person"**: means the person against whom the allegation of Sexual Harassment has been made by the Complainant or the Victim.
3. **"Board"**: board of directors of the Company.
4. **"Company"**: Jagatjit Agri Engineering Limited
5. **"Employees"**: permanent employees, temporary employees, ad hoc basis, daily wage workers, contract labors, trainees, apprentices and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace.
6. **"Internal Complaint Committee"/ "ICC"**: The committee constituted as per the provisions of the Act.



7. **"Sexual harassment"**: may be one or a series of incidents involving unsolicited and unwelcomed sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.
8. **"Sexual Harassment"** at the workplace includes:
 - a) unwelcomed sexual advances (verbal, written or physical),
 - b) demand or request for sexual favours,
 - c) Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
 - d) Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
 - e) verbal abuse or 'joking' that is sex-oriented;
 - f) any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions;
 - g) any other type of sexually-oriented conduct.
9. **"Victim"** means a person(s) who has been a recipient of Sexual Harassment.
10. **"Workplace"** includes:
 - a) All offices, establishments or other premises where the Company's business is conducted.
 - b) All company-related activities performed at any other site away from the Company's premises.
 - c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

D. Responsibilities regarding sexual harassment:

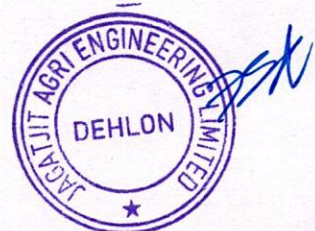
All Employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All Employees are encouraged to reinforce the maintenance of a Workplace free from Sexual Harassment.

E. Complaint mechanism:

An appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the Victim.

F. Internal Complaints Committee:

1. The Company has constituted an Internal Complaints Committee for redressal of Sexual Harassment complaint (made by the Victim) and for ensuring time bound treatment of such complaints.
2. Initially, and till further notice, the Internal Complaints Committee will be formed in accordance with the Act, and will comprise of the following four members:
 - a) Presiding officer: A woman employed at a senior level in the organization or workplace from amongst the employees;
 - b) At least 2 members from amongst employees, committed to the cause of women or have had experience in social work or having legal knowledge;



- c) One member from amongst non-governmental organisations 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 total members shall consist of women.

3. The Internal Complaints Committee is responsible for:

- a) Receiving complaints about Sexual Harassment at Workplace;
- b) Investigating every formal written complaint of Sexual Harassment;
- c) Co-ordinating with employer in implementing appropriate action;
- d) Taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment;
- e) Discouraging and preventing employment-related Sexual Harassment.

G. Roles and Responsibilities of Internal Complaints Committee:

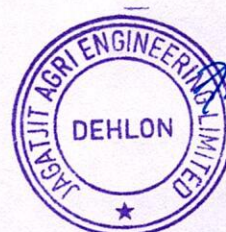
- a) provide assistance if an employee or a student chooses to file a complaint with the police;
- b) provide mechanisms of dispute redressal and dialogue to anticipate and address issues through just and fair conciliation without undermining the complainant's rights, and minimize the need for purely punitive approaches that lead to further resentment, alienation or violence;
- c) protect the safety of the complainant by not divulging the person's identity, and provide the mandatory relief by way of sanctioned leave or relaxation of attendance requirement or transfer to another department or supervisor as required during the pendency of the complaint, or also provide for the transfer of the offender;
- d) ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment;
- e) ensure prohibition of retaliation or adverse action against a covered individual because the employee or the student is engaged in protected activity.

H. Procedures for resolution, settlement or prosecution of acts of sexual harassment:

The Company is committed to providing a supportive environment to resolve concerns of Sexual Harassment as under:

1. Informal Resolution Options

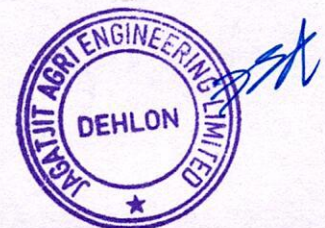
- a) When an incident of Sexual Harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.
- b) If the harassment does not stop or if Victim is not comfortable with addressing the harasser directly, the Victim can bring their concern to the attention of the Internal Complaints Committee for redressal of their grievances. The Internal Complaints Committee will thereafter provide



advice or extend support as requested and will undertake prompt investigation to resolve the matter.

2. Complaints:

- a. An Employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the presiding officer of the Internal Complaints Committee constituted by the Company. The complaint shall have to be in writing and can be in the form of a letter, preferably within fifteen (15) days from the date of occurrence of the alleged incident and in case of a series of incidents, within fifteen (15) days from the occurrence of last alleged incident, sent in a sealed envelope, but no later than three months from the date of incident and in case of a series of incidents, no later than three months from the date of last incident (The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.). Alternately, the employee can send the complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the presiding officer to contact them and take the matter forward.
 - b. The presiding officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within thirty (30) days from receipt of the complaint.
 - c. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
 - d. If the presiding officer of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
 - e. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
3. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board as soon as practically possible and in any case, not later than ninety (90) days from the date of receipt of the



complaint. The Executive Directors will ensure corrective action on the recommendations of the Internal Complaints Committee and keep the complainant informed of the same.

4. Corrective action may include any of the following:
 - a. Formal apology.
 - b. Counselling.
 - c. Conciliation.
 - d. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - e. Change of work assignment / transfer for either the perpetrator or the victim.
 - f. Suspension or termination of services of the employee found guilty of the offence.
5. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

I. Confidentiality

1. The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.
2. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

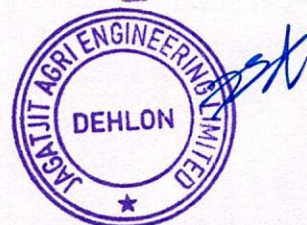
J. Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

K. Protection to complainant / victim

1. The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.
2. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
3. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

- L. Reporting as per the Section 22 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules made thereunder



The Internal Complaints Committee shall in each calendar year prepare an annual report and submit the same to the employer which shall have following details included in its annual report:-

- number of complaints filed during the financial year;
- number of complaints disposed of during the financial year;
- number of complaints pending for more than 90 days;
- number of workshop or awareness programme against sexual harassment carried out; and
- nature of action taken by the employer.

M. Reporting as per Rule 8 of the Companies (Accounts) Rules, 2014 read with Companies Act, 2013:

The below mentioned points shall form part of the Boards' Report of the Company as per the aforesaid rule read with Section 134 of the Act:

a statement that the company has complied with provisions relating to the constitution of Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 along with the following details:-

- (a) number of complaints of sexual harassment received in the year;
- (b) number of complaints disposed off during the year; and
- (c) number of cases pending for more than ninety days

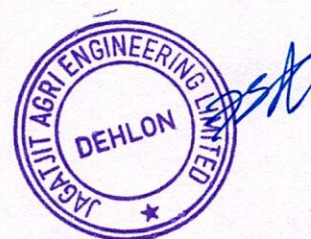
N. Reporting As Per Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

The following disclosure shall be made in corporate governance report forming part of annual report in respect to sexual harassment:-

- number of complaints filed during the financial year
- number of complaints disposed of during the financial year
- number of complaints pending as on end of the financial year

O. Amendment:

This Policy will be reviewed at least once in every one to two years by the Board in order to determine whether revisions may be required due to changes in the law or regulations, if revisions are required, same is implemented and duly inform to all the employees.



P. Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

