



NAMAN
INNOVATION LTD.

CIN NO.: U51909GJ2022PLC136371

GSTIN: 24AAICN5624L1Z8

☎ +91 7984983407

✉ Info@namaninnovation.com

🌐 www.namaninnovation.com

NAMAN INNOVATION LIMITED

Registered Office: Plot No. 30 and 31, Panchratna Green Industrial Park, Paldi,
Kankaj, Ahmedabad, Daskroi, Gujarat, India, 382425

Tel No: +91 7984983407

Email: Info@namaninnovation.com

POLICY ON SEXUAL HARRASSMENT

NAMAN INNOVATION LIMITED

Registered Office Address:

Plot No. 30 & 31, Panchratna Green Industrial Park, Paldi, Kankaj,
Ahmedabad, Daskroi, Gujarat, India, 382425

Warehouse / Godown Address:

Plot No. 29, 58, 59 and 60, Panchratna Green Industrial Park,
Paldi, Kankaj, Ahmedabad, Daskroi, Gujarat, India, 382425

SEXUAL HARASSMENT POLICY

Introduction

Naman Innovation Limited recognizes the right of every employee and volunteers to be able to attend work and to perform their duties without being subjected to any form of sexual harassment.

It is the obligation and responsibility of every employee and volunteers to ensure that the workplace is free from sexual harassment.

Naman Innovation Limited is fully committed to its obligation to eliminate sexual harassment in the workplace.

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 their colleagues and third parties with full fairness and respect and realize that his / her behavior will be attributed to the company and can affect its inward and outward reputation

Purpose & Objectives:

The purpose of this document is to outline Naman Innovation Limited's position on sexual harassment and to document the process which is to be followed if any grievances arise.

The objective in implementing and enforcing this policy is to define workplace sexual harassment, prohibit it in all forms, carry out appropriate disciplinary measures in the case of violations, and provide procedures for lodging complaints about conduct that violates this policy and investigating sexual harassment claims.

Scope:

This policy applies to all employees, workers and trainees of the Company (whether in the office premises or outside while on assignment

All workers, including supervisors and managers, will be subject to discipline, up to and including discharge, for any act of sexual harassment they commit.

Where sexual harassment occurs to any employee of the Company 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

Definitions:

Sexual harassment means any unwelcome sexual advance, unwelcome request for sexual favors, or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, and where that reaction is reasonable in the circumstances. Examples of sexual harassment include, but are not limited to,

- staring or leering
- unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching
- suggestive comments or jokes
- insults or taunts of a sexual nature
- intrusive questions or statements about your private life
- displaying posters, magazines or screen savers of a sexual nature
- sending sexually explicit emails or text messages
- inappropriate advances on social networking sites
- accessing sexually explicit internet sites
- requests for sex or repeated unwanted requests to go out on dates
- behavior that may also be considered to be an offence under criminal law, such as physical

assault, indecent exposure, sexual assault, stalking or obscene communications

- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

The following circumstances, among the other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment.

- implied or explicit promise of preferential treatment in employment; or
- implied or explicit threat of detrimental treatment in employment; or
- implied or explicit threat about present or future employment status.

However, behavior that is based on mutual attraction, friendship and respect is not sexual harassment.

If you are being harassed:

(a) Tell the accused that his / her behavior is unwelcome and ask him / her to stop.

(b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.

(c) File a complaint as soon as possible. If, after asking the accused to stop his/her behavior, the harassment continues, report the abuse to the Internal Complaints Committee ('ICC') formed for this purpose.

Internal Complaint Committee (ICC):

The Company hereby constitutes an Internal Complaints Committee (from now on referred to as 'Committee') as required under section 4 of the Act. The Committee has been established to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively, and expeditiously. The ICC shall comprise of a Presiding Officer and at least 2 other employees of the Company committed to the cause of prevention of sexual harassment at workplace and the details of the Committee members are as follows:

Sr. No.	Name	Designation
1.	Mr. Ankit Niraj Kothari	Non-Executive Independent Director as Presiding Officer
2.	Mrs. Krupa Atulbhai Mehta	Non-Executive Independent Director as Member
3.	Mr. Naman Andrapiya	Chairman cum Executive Non-Independent Director as Member

The committee shall be responsible for:

- a) Receiving complaints of sexual harassment at the workplace
- b) Initiating and conducting an inquiry as per the established procedure
- c) Submitting findings and recommendations of inquiries
- d) Coordinating with the employer in implementing appropriate action
- e) Maintaining strict confidentiality throughout the process as per established guidelines
- f) Submitting annual reports in the prescribed format.

Dealing with the Complaint:

- a) It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the ICC of any instance or behavior or sexual harassment by a co-worker towards another employee.
- b) The concerned employee shall give his complaint in writing to the Presiding Officer of the Committee giving as much details of the incident as possible, within a week of its occurrence, which may include:
 1. The name, department and position of the person or persons allegedly causing the harassment.
 2. A description of the incident(s), including the date(s), location(s) and the presence of any witnesses.
 3. The effect of the incident(s) on the complainant's ability to perform his or her job, or on other terms or conditions of his or her employment.
 4. The names of other individuals who might have been subject to the same or similar harassment.
 5. What, if any, steps the complainant has taken to try to stop the harassment.

6. Any other information the complainant believes to be relevant to the harassment complaint.

c) Once the complaint is received, it will be kept strictly confidential.

d) The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.

e) The Committee shall ensure that a fair and just investigation is undertaken immediately.

f) Both the complainant and the alleged accused 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.

g) The ICC after receipt of the Complaints, conduct enquires, handle, deal with the complaints, call for written explanation, call upon and examine any / all witnesses mentioned by the complainant and accused, initiate corrective actions, resolve the disputes, lodge complaints with appropriate authorities and to initiate all action and to do all acts and things may be applicable.

h) The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of harassed as claimed the accused will be disciplined accordingly.

i) The victim of sexual harassment has the option to seek transfer of the accused or his / her own transfer.

While dealing with any case of Sexual harassment, the Committee shall ensure that alleged harasser also has the right to have support or representation during any investigation, as well as the right to respond fully to any formal allegations made. There will be no presumptions of guilt and no determination made until a full investigation has been completed.

Any reports of sexual harassment will be treated seriously and promptly with sensitivity. Such reports will be treated as completely confidential up to the point where a formal or informal complaint is lodged against a particular person, at which point that person must be notified under the rules of natural justice. Complainants have the right to determine how to have a complaint treated, to have support or representation throughout the process, and the option to discontinue a complaint at any stage of the process.

Disciplinary Action:

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the Complainant.

Confidentiality

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept as confidential as possible. However, the identity of the complainant is usually revealed to the respondent and witnesses. The HR director takes adequate steps to ensure that the complainant is protected from retaliation during the period of the investigation. All information pertaining to a sexual harassment complaint or investigation is maintained by the HR head in secure files. The HR head can answer any questions relating to the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

Protection to Complainant / Victim

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. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

Documentation:

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's files with the full report of the Complaints Committee.

Dissemination of the Policy:

A copy of this policy shall be circulated amongst all the employees of the Company. Further, a copy of the Policy would be uploaded in the website of the Company.

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, our 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. The employees who are victims of sexual harassment may in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

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.
