

**Sexual Harassment Policy**

Applicability	All employees of FDC	Initiated by	Human Resources <i>[Signature]</i>
Effective	22 nd August 2023	Approved by	MD/ JMD/DIRECTORS

FDC LTD. (the Company) is committed to providing a workplace in which the dignity of every individual is respected. Company has a zero tolerance policy for any incident of sexual harassment or inappropriate behavior. This policy is in addition to any other law, regulation, rules that relate to the contents and subject of this policy.

Objective:

FDC LTD. has framed this policy to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

Scope:

This policy covers:

- Sexual harassment
- Complaint process
- Redressal process
- Enquiry Process

Eligibility:

This Policy is applicable to all employees of FDC.

I. Definitions***Office Premises/Workplace:***

Apart from the actual place of work, Office Premises includes transportation provided by the Company that employees use to and from office such as the cabs, buses, etc. The definition would also extend to the hotel rooms / guest houses provided by the Company, while an employee is traveling during the course of employment. It not only means the office but also includes the building that houses it and all the neighboring offices that are located inside it. For all practical implications, the terms 'Office Premises' and 'Workplace' will bear the same meaning within the scope of this policy framework and will be given the widest meaning possible for the purposes of this policy.

Sexual harassment:

Sexual Harassment includes any such unwelcome sexually determined acts or behavior (whether directly or by implication) such as:-

- (a) Physical contact and advances;
- (b) A demand or request for sexual favors;
- (c) Sexually colored remarks;
- (d) Showing pornography;
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that her objection would disadvantage them in connection with employment, including recruiting or promotion or when it creates a hostile working environment.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories - quid pro quo and creation of a hostile working environment.

(a) Under the quid pro quo (meaning this for that/ favor for a favor) form of harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

(b) A hostile work environment arises 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 experienced as an attack on personal dignity. For example an employee tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers.

However, an employee who is sexually harassed can complain about the same even if there is no adverse job consequence.

If you are being harassed:

- (a) Tell the accused that his behavior is unwelcome and ask him 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 behavior, the harassment continues, report the abuse to the Internal Complaints Committee formed for this purpose.

II. Internal Complaints Committee

FDC has formed an Internal Complaints Committee for Prevention of Sexual Harassment in workplace. The Committee has been formed according to the guidelines notified and comprises of:

- ❖ Presiding Officer
- ❖ Members (not less than five)
- ❖ One among the five members is an independent person familiar with the issue of sexual harassment.
- ❖ A woman is heading the complaint committee and not less than half of its members are women.
- ❖ The Presiding Officer and every member of the internal committee shall hold the office for such period not exceeding three years.

[Note - A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer and at least two members, one of whom shall be a lady. The Committee shall be required to make an annual report to the Company of the complaints and action taken by them.]

FACILITATORS TO THE INTERNAL COMPLAINT COMMITTEE

Plants and field employees if aggrieved can report the complaint to the respective facilitators.

Scope of the Facilitators:

The facilitators from the plant and field have to make a note of the complaint, gather information and necessary documentary evidence if any and hand it over to the Internal Complaints Committee for further investigations. The scope of the facilitator does not involve investigations.

The aggrieved employees can also directly report to the Internal Committee Members.

III. Redressal Process and Enquiry Process (How to report a complaint related to sexual harassment)

- Any employee ("Complainant") who has a reasonable apprehension that she is being sexually harassed directly or indirectly may submit a complaint of the alleged incident/s to any member of the Committee in writing with her signature or email the complaint to complaint.committee@fdcindia.com preferably within 3 Months of occurrence of incident. The Committee may extend this time limit by a maximum of 3 Months, if it is satisfied that grave circumstances prevented the complaint to be filed.
- The Committee will hold a meeting with the Complainant within a reasonable time of the complaint, but not later than 10 days in any case.
- The Committee members shall hear the complainant and record the allegations of the Complainant. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity shall be given to him to give an explanation, where after, an "Enquiry Process" shall be conducted and concluded.
- If the Complainant or the person against whom complaint is made desires any witnesses to be called, she/he shall communicate in writing to the committee the names of witnesses whom she proposes to call.
- The Committee shall complete the "Enquiry Process" within reasonable period but not beyond 90 days and communicate its findings and its recommendations for action to the Management.
- The report of the Committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment including immediate termination of employment.
- The Committee shall also be governed by such rules as may be framed by the Supreme Court orders issued or any other legislation enacted by the Government of India in this respect.



IV. How the Company will respond

Investigation and response

If an employee reports a complaint of harassment or inappropriate conduct, the Committee will promptly investigate the complaint. Where there has been a violation of policy, the Committee will take disciplinary action (up to and including immediate termination) against those violating the Policy. The Committee will also take appropriate action to try to avoid future violations. The Committee will inform parties about the status of reviewing their complaints. To respect the privacy and confidentiality of all people involved, the Committee might not share specific details of the discipline or other action taken.

The Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

Where harassment or Sexual Harassment occurs as a result of an act or omission by any third party or outsider, the Committee shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

V. Outcomes and Actions:

The Company is committed to provide a hassle-free work environment to all its employees at all times. Hence, any employee found guilty of violating the Sexual Harassment Policy will be liable to face the below consequences:

- Every employee is expected to be aware that inappropriate behaviors are unacceptable within Office Premises. ***Ignorance is not an excuse for unacceptable behavior.***
- Any ***employee found guilty of any of these behaviors*** may face punitive action, which might include termination of services.
- Any ***employee found guilty of misusing this policy*** by falsely and deliberately implicating a colleague (as concluded by the Investigation Committee after investigation) may also face punitive action, which might include termination of services.
- This policy strictly prohibits any retaliation against an employee or other person who reports a concern about harassment or other inappropriate behavior. Employees engaging in such retaliation are liable to face punitive action including dismissal or termination of services.



In case the Committee finds the conduct of the employee amounts to a specific offence under the Indian Penal Code or under any other law, the Company may also initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

VI. 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 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.