

LEAP INDIA FOOD & LOGISTICS PRIVATE LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

A. Objective

The objective of this policy is to prevent, prohibit and redress any form of sexual harassment at the workplace.

B. Applicability

It applies to all individuals employed or engaged with the Company, including employees, interns, apprentices, contract workers and consultants.

C. Sexual Harassment - Definition

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- (i) Physical contact and advances
- (ii) Demand or request for sexual favours
- (iii) Making sexually coloured remarks
- (iv) Showing pornography
- (v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following is a non-exhaustive list of actions that may constitute sexual harassment:

- (i) Implied or explicit promise of preferential treatment in employment
- (ii) Implied or explicit threat of detrimental treatment in employment
- (iii) Implied or explicit threat about present or future employment status
- (iv) Interference with work or creating an intimidating or offensive or hostile work environment
- (v) Humiliating treatment likely to affect health or safety

D. Prohibition of Sexual Harassment at the Workplace

Sexual harassment at the Company's workplace, whether it is during or after office hours, overt or subtle, quid pro quo or environmentally hostile, is strictly prohibited both by law as well as this policy.

For the purposes of this policy, it is clarified that 'workplace' also includes any place visited by the employee arising out of or during the course of employment including transportation provided by the Company for undertaking any journey.

Individuals engaged in behaviour that is found to be sexual harassment can be held personally liable for such conduct.

E. Internal Complaints Committee

The Company has constituted an Internal Complaints Committee ("ICC") to investigate into allegations of sexual harassment at the Company's workplace.

The management reserves the right to add to, remove or replace the ICC members from time to time.

F. Reporting the Complaint

The complainant is required to make the complaint in writing or via email to the ICC as soon as possible, not later than three months from the date of occurrence of the incident alleged to constitute sexual harassment (in case of a series of incidents, within a period of 3 months from the date of the last incident). Hard-copy complaints should be submitted to Mr. KVS Prakash Rao – Head of Admin & Human Resource department and email complaints should be sent to grievance@leapifl.com. All complaints, whether in hard-copy or email form, should be clear and should include details of the incident or incidents, supporting documents, names of individuals involved and the names and addresses of the witnesses.

It is the obligation of the complainant to make the complaint in relation to an incident of sexual harassment at the workplace. The complainant may request the ICC to provide reasonable assistance for making the complaint in writing. In case the complainant is under any physical or mental incapacity, the complaint can be made by the legal heir or any other person authorized in writing by the complainant.

G. Conciliation

Before the ICC initiates an inquiry, the complainant may request the ICC to settle the matter between such employee and the respondent through conciliation. However, no monetary settlement shall be made in connection with any conciliation.

In the event a settlement has been reached, further inquiry shall not be conducted by the ICC. All individuals are expected to report to the ICC in case any terms of the settlement have not been complied with by the other party.

H. Inquiry / Investigation of Claims of Sexual Harassment at the Workplace

All claims of sexual harassment will be promptly and thoroughly investigated by the ICC.

The ICC shall investigate upon receiving the complaint. The ICC will have the powers to call any person and record their statements and make such investigation as may be necessary to evaluate the complaint. For the purposes of the inquiry, the ICC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 of India when trying a suit in respect of the following matters:

- a. Summoning and enforcing the attendance of any person and examining him on oath, and
- b. Requiring the discovery and production of documents.

The ICC shall have the right to terminate the inquiry proceedings or to give an *ex-parte* decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Presiding Officer of the ICC.

Neither the complainant nor the respondent shall be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.

I. Inquiry Report and Disciplinary Action Post Inquiry / Investigation

The ICC shall submit an enquiry report to the Company's authorized representative upon conclusion of the inquiry. The report of the ICC shall be deemed to be the enquiry report for purposes of any disciplinary rules applicable to the employee against whom a complaint of sexual harassment was made.

Where the ICC determines that the allegation against the respondent has been proved, it may recommend to the Company to, as the case may be:

- a. To take action for sexual harassment as a misconduct in accordance with the Company's policies
- b. To deduct from the salary/ wages payable to the perpetrator, such sum as it may deem appropriate to be paid to the aggrieved employee or to his/her legal heirs.

In the event the ICC determines that the complaint is false or malicious, the ICC may recommend to the Company to subject the individual making the false complaint to disciplinary action, up to and including termination of employment. It is hereby clarified that mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant.

J. Confidentiality

Reports of alleged harassment and discrimination will be treated with confidentiality and respect. Those involved in investigating the matter shall only disclose information as necessary in connection with the investigation.

Information may however be disseminated regarding the justice secured to any victim of sexual harassment under law without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved employee and witnesses.

If any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or actions under law, contravenes his/her confidentiality obligation, he/she shall be liable in accordance with the provisions of the Company policies, as applicable, and may be subjected by the Company to disciplinary action, including but not limited to payment of fines.

K. Retaliation

The Company prohibits employees from taking negative action against any individual for reporting conduct that may constitute sexual harassment.

L. Information

Please contact Mr. KVS Prakash Rao – Head of Admin & Human Resource Department for any questions or further guidance in relation to this policy.

M. Company's Discretion

This policy is implemented in the sole discretion of the Company, and it may be modified or amended at any time in the sole discretion of the Company.