

- **Prevention of Sexual Harassment (POSH)**

“The Sexual Harassment of Women at Workplace(Prevention, Prohibition and Redressal) Act, 2013”

1. Objective:

The objective of this policy on Prevention of Sexual Harassment (POSH) is to provide protection against sexual harassment of women at workplace and for prevention and redressal of complaints of sexual harassment and formatters connected with and incidental to it.

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace(Prevention, Prohibition and Redressal) Act, 2013” and rules framed there under. Accordingly, while the policy covers all the key aspects of the act, for any further clarification reference shall always be made to the act.

UNIQUE CHAINS AND JEWELS LIMITED does not support discrimination of individuals on the basis of race, color, gender, age, national origin, religion, sexual orientation, marital status, citizenship or disability. Sexual Harassment at workplace is strictly prohibited. Sexual Harassment results in violation of the fundamental rights of a person to equality under articles of the Constitution of India and her/his right to life and to live with dignity and the right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment which is free from sexual harassment.

UNIQUE CHAINS AND JEWELS LIMITED treats sexual harassment as gross misconduct under the service rules and other applicable laws and action will be initiated appropriately for such misconduct. It is necessary for employees to deal with their colleagues and third parties with full fairness, respect and dignity and realize that his/her behavior will be attributed to UNIQUE CHAINS AND JEWELS LIMITED and can affect its reputation

2. Coverage:

POSH covers Unique Chains and Jewels Limited which aims to adopt zero tolerance attitude against any kind of sexual harassment or discrimination caused by any employee during their tenure in Unique Chains and Jewels Limited towards any other person being an employee of Unique Chains and Jewels Limited, trainee, client, vendor or contractor in Unique Chains and Jewels Limited premises or elsewhere in India or abroad (whether in the office premises or outside while on assignment).

This policy will also apply to women who are covered by definition in “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”. Where sexual harassment occurs to employee as a result of an act by a third party or outsider while on official duty, Unique Chains and Jewels Limited Will take all necessary and reasonable steps to assist her/him in terms of support and preventive action. While the act covers women only, as per the policy men too can approach the committee.

3. Definitions:

Sexual Harassment (SH) may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between a Unique Chains and Jewels Limited employee and someone that employee deals with in the course of his/her work who is not employed by Unique Chains and Jewels Limited "Sexual Harassment (SH)" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication). Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliatea person at whom the behavior was directed namely:

- Physical contact and advances
- Demand or request for sexual favors
- Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
- 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.
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
- Giving gifts or leaving objects that are sexually suggestive
- Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy
- Persistent watching, following, contacting of a person
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about the present or future employment status

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Regd Office - Bullion House, 2nd Floor, 115 Tambakatta Lane, Mumbadevi Road, Near Hotel Sharda, Mumbai - 400 003.

Tel.: +91-22-23115000 GST No. 27AABC1931G1ZJ CIN No. U74900MH2010PLC204518



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- Interference with the person's work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety

4. Redressal Mechanism Formal intervention:

If in the complainant's view there has been an incident of sexual harassment which is serious enough to warrant formal intervention, the complainant should lodge a written complaint, which shall be followed by a formal redressalmechanism as described in this Policy. In case of a verbal complaint, the complaint will be given in writing by the receiver of the p and signatures of the complainant will be obtained

The complaint should be made immediately after the alleged offence is committed, unless the complainant submitssufficient cause for a delay, as described in "Lodging a complaint" section. Internal Committee (Henceforth known as 'Committee'): To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Committee" shall be constituted.

5. Human Resources: HR Department has the responsibility for ensuring the maintenance, regular review and updating of the policy. Any queries on the application or interpretation of this policy must be discussed with HR Department. Further, any complaints received under this policy will be handled by the Committee, as per the guidelines provided.

6. Committee: The details of the Committee will be notified to all covered persons at Mumbai office. The Committee will comprise of (Refer annexure A):

- Presiding Officer: A woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- One external member, familiar with the issues relating to sexual harassment

The Committee shall be responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure, Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines

7. Disclaimer: **Unique Chains and Jewels Limited** reserves the right to amend the Policy from time to time in order to comply with any laws/ rules / regulations that come into effect from time to time, related to Sexual Harassment.

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POSH Committee

An employee may contact the Committee by writing to cs@uniquechains.org and hr@uniquechains.org or any of its members, who are listed below.

Sr. No.	Name	Role	Contact Number	Email id
1	Mrs. Parvati Dilip	Presiding Officer	8828107406	cs@uniquechains.org
2	Mr. Ankit Mehra	Member	9820952278	acc22ucpl@gmail.com
3	Mrs. Trupti Penkar	Member	9821069575	admin@uniquechains.org
4	Mr. Vaibhav Kamble	Manager HR & Admin	9152568874	hr@uniquechains.org
5	Mr. Parmesh Adarkar	CFO	8422033057	cfo@uniquechains.org
6	Ms. Divya Srivastava	External Member	9930332514	divya@thesilverlining.in