



Symphony Limited

Policy on Prevention of Sexual Harassment at Workplace

I. PREAMBLE

This policy is framed as required by the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred as Act).

II. INTRODUCTION

Symphony Limited (the “Company”) is dedicated to fostering a work environment where every employee is treated with dignity, respect, and receives fair treatment. Additionally, the Company is committed to cultivating a workspace that supports the professional development of its employees and advocates for equal opportunities. Any form of sexual harassment is strictly prohibited within the Company, and the Company is resolute in taking all essential measures to prevent any instances of harassment towards its employees.

III. INTERPREATION

Any terms used herein shall have the same meaning as defined in the Act (including any statutory modification(s) or re-enactment thereof for the time being in force).

IV. SCOPE

This policy is applicable to all employees working at all workplaces and locations of the Company.

V. MEANING OF SEXUAL HARASSMENT

“Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely –

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

VI. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

The Internal Complaints Committee (the “Committee”) has been constituted for redressal of sexual harassment complaint made by any employee. The Committee shall consist of at least the following members or such other members as the committee may decide from time to time, however, one-half of the total members shall be women:

1. Chairman of the Committee – shall be a woman.
2. Division Head from where complaint has been originated.
3. A Senior Office Employee from Human Resources Department.
4. Any Independent Person of repute, appointed by the Managing Director of the Company.

Email id to contact the Chairperson of the Internal Complaints Committee is hrd@symphonylimited.com

The Committee is responsible for:

- ✓ Investigating every formal written complaint of sexual harassment.
- ✓ Taking appropriate remedial measures to respond to any substantiated allegation of sexual harassment.
- ✓ Discouraging and preventing employment related sexual harassment.

VII. DEALING AND REPORTING OF COMPLAINTS

Dealing and reporting of complaints should be made as specified under the Act.

VIII. 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.

IX. CONFIDENTIALITY

All information received shall be kept confidential. Any person (including witness) who breaches confidentiality shall be subject to disciplinary action.

X. REVIEW OF THIS POLICY

This Policy will be reviewed and updated from time to time to ensure that it is current. All updates and revisions to the Policy will be approved by the Board of Directors (Board) of the Company or its delegated POSH Committee or the Executive Director, Chief Financial Officer and Company Secretary of the Company.
