

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN (POSH) as amended Effective from 06th August, 2024 IN 20 MICRONS NANO MINERALS LIMITED

1. Preamble

At 20 Microns Nano Minerals Limited (20MNML), we are committed to providing a work environment that is free from all forms of discrimination and harassment, including sexual harassment of Women. This policy outlines our zero-tolerance approach towards sexual harassment and provides guidelines for reporting and addressing such behaviour inter alia as follows:

- Treat each other with dignity and respect
- Follow the letter and spirit of the law
- Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
- Refrain from creating a hostile atmosphere at the workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.

20MNML will not tolerate any form of sexual harassment and is committed to taking all necessary steps to ensure that its employees are not subjected to any form of harassment.

This policy has been framed with the intention of preventing Sexual Harassment in the workplace including prohibition and redressal of sexual harassment.

2. Scope

This policy applies to all employees, including full-time, part-time, temporary, and contract workers, as well as interns. Clients & Customers or suppliers. It also covers all forms of communication and interaction within the workplace, including virtual and remote environments, company-sponsored events, and business-related social gatherings.

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 and Chief Financial Officer & Company Secretary of the Company.

3. Definition

Sexual Harassment

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Sexual harassment refers to unwelcome or unwanted conduct of a sexual nature, whether verbal, physical, or visual, that creates an intimidating, hostile, or offensive work environment or interferes with an individual's work performance. Examples of sexual harassment include, but are not limited to:

- Unwelcome sexual advances, requests for sexual favors, or other verbal, physical, or visual conduct of a sexual nature.
- Displaying sexually explicit materials in the workplace.
- Demand or request for sexual favors.
- Making offensive comments about a person's appearance, gender, or sexual orientation.
- Using derogatory or sexually suggestive language or gestures.

Aggrieved woman: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy

4. Roles and Responsibility

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- a. Refusing to participate in any activity which constitutes harassment
- b. Supporting the person to reject unwelcome behaviour
- c. Acting as a witness if the person being harassed decides to lodge a complaint

5. Redressal Mechanism

In compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described in this Policy. Employees who experience or witness sexual harassment are encouraged to report the behaviour immediately to the respective IC.

Internal Committee (IC)

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the company. The detail of the committee is notified to all covered persons at the location (workplace). The committee at each location comprises of:

1. Presiding Officer: A woman employed at a senior level in the organization or workplace
2. At least 2 members from amongst employees, committed to the cause of women or who have had experience in social work or have legal knowledge
3. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
4. At least one-half of the total members nominated are women

The committee will be responsible for:

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting an inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the employer in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format.

6. Procedures for resolution, settlement, or prosecution of acts of sexual harassment:

20MNML is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

- When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.
- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Resolution procedure through formal inquiry

The committee will initiate inquiry in the following cases:

- No conciliation is requested by aggrieved woman
- Conciliation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent

Manner and Procedure of inquiry into complaint:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case.
- At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
- Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.
- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- If either party desires to tender any documents by way of evidence before the Committee, the same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
- No legal practitioner can represent any party at any stage of the inquiry procedure
- The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present
- The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

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If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure should ensure absolute fairness to all parties.

- 7. Resolution procedure through conciliation:** Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman. No monetary settlement can be made as a basis of conciliation. In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation is to happen within 2 weeks of receipt of complaint. 6 The committee shall provide copies of the settlement to the complainant & respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the committee.

Appeal: If any employee not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

8. Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

9. Retaliation

Retaliation against any individual who reports sexual harassment or participates in an investigation is strictly prohibited. Employees found to have engaged in retaliation will be subject to disciplinary action, up to and including termination of employment.

10. Confidentiality

20MNML understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

11. Consequences of Violations

Violations of this policy will result in disciplinary action, which may include verbal or written warnings, suspension, or termination of employment, depending on the severity of the offense. Additionally, individuals who engage in sexual harassment may be subject to legal consequences.

12. Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by 20MNML except where disclosure is required under disciplinary or other remedial processes.

13. Legal Compliance

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act).

14. Conclusion

We are committed to fostering a workplace culture that promotes respect, dignity, and equality for all employees. By adhering to this policy and supporting one another, we can create a safe and inclusive environment where everyone can thrive.