#### POLICY ON SEXUAL HARASSMENT OF EMPLOYEES

### Introduction:

Gemstone Investments Limited wishes to maintain a work environment that fosters personal and professional growth for all employees. Maintaining such an environment is the responsibility of every staff person. The Company is committed to provide a harassment-free environment for its employees and volunteers. Mutual respect, along with cooperation and understanding, must be the basis of interaction between members and staff. The Company will neither tolerate nor condone behaviour that is likely to undermine the dignity or self-esteem of an individual, or create an intimidating, hostile or offensive environment.

## Scope:

This policy extends to all the categories of employees of the Company including permanent management and workmen, trainees, and employees on contract at the workplace or at client sites and is deemed to be incorporated in terms & conditions of all employees.

### **Definition of Sexual Harassment**

The definition of sexual harassment includes any unwelcome sexually determined behaviour (whether directly or by implication) such as physical contact and advances, demand or request for sexual favours, sexually coloured remarks, showing pornography, or any other unwelcome physical verbal or non-verbal conduct of sexual nature.

Sexual Harassment at the workplace includes:

- Unwelcome sexual advances (verbal, written or physical),
- Demand or request for sexual favours,
- Any other type of sexually-oriented conduct,
- Verbal abuse,
- Any conduct that has the purpose or the effect of interfering with an individual's work
  performance or creating an intimidating, hostile or offensive work environment and/or
  submission to such conduct is either an explicit or implicit term or condition of employment
  and /or submission or rejection of the conduct is used as a basis for making employment
  decisions.

## Responsibilities Regarding Sexual Harassment

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

# Redressal of Complaints

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

- 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 Management for redressal of their grievances.
- 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.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- The management 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, SIL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.