

S. M. GOLD LIMITED

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ANTI SEXUAL HARASSMENT POLICY

OBJECTIVE:

S. M. GOLD LIMITED is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. S. M. GOLD LIMITED will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

This policy is in alignment to the Sexual harassment of Women at workplace (Prevention, Prohibition, & Redressal) Act, 2013.

BRIEF ON POLICY:

The following circumstances, among other circumstances, if it occurs or is present or in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours.

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks

- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Any act of sexual harassment is strictly prohibited and violation of the policy would be viewed strictly by the company and such misconduct would invite stringent disciplinary action including termination.

The company reserves the right to deduct from the salary or wages of the employee found guilty, as the company may consider appropriate to be paid to the aggrieved party or their legal heirs.

Every employee is hereby advised to bring to notice of any incident of sexual harassment to the INTERNAL COMPLAINTS COMMITTEE(as defined below)to ensure redressal.

If allegations of sexual harassment are found to be false and malicious or any forged or misleading documents are produced, the company shall take stringent disciplinary action including termination.

REDRESSAL MECHANISM- INTERNAL COMPLAINTS COMMITTEE

1. Company has decided to form INTERNAL COMPLAINTS COMMITTEE for redressal of Complaint under this policy.
2. The names of members of the committee shall be communicated through notification in prominent place within the Company.
3. Any aggrieved party can approach this committee through a written complaint within 3 months of the incident.
4. The committee will investigate and conclude within 90 days of the complaint registration and will submit their report to managing director of the Company.
5. The Company will act on the recommendation of the committee within 60 days of receipt of report from ICC.