

MARVEL DECOR LIMITED

(FORMERLY KNOWN AS “MARVEL DECOR PRIVATE LIMITED” & “ACCUMAX INTERIOR PRODUCTS PRIVATE LIMITED”)

Sexual Harassment Prevention Policy

Company is of the firm believer of creating a environment in which dignity of women workforce is top most priority and no kind of differentiation is made in selecting and dealing with employees on the basis of their gender. Company maintains a work atmosphere, where employees can flourish their professional growth.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

Scope:

This policy applies to each and every female, irrespective of the fact that whether she is employee of the company, contractor's employee, trainee or outsider visiting the company. Further, Scope does not restricted only up to premise of the company, but also cover client's premise or any other place when employee is on the duty of the company.

Definition of Sexual Harassment:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

1. Sexual Harassment at the workplace includes:
 1. Unwelcome sexual advances (verbal, written or physical),
 2. Demand or request for sexual favours,
 3. Any other type of sexually-oriented conduct,
 4. Verbal abuse or 'joking' that is sex-oriented
 5. 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 behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Complaint Mechanism:

An appropriate complaint mechanism in the form of “**Complaints Committee**” has been created in the Company for time-bound redressal of the complaint made by the victim.

Complaints Committee:

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of such members as may be decided from Board from time to time.

The Complaints Committee is responsible for:

1. Investigating every formal written complaint of sexual harassment
2. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
3. Discouraging and preventing employment - related sexual harassment

Complaint

An employee may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & Head-P&A as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & Head-P&A will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- 1) Formal apology
- 2) Counseling
- 3) Written warning to the perpetrator and a copy of it maintained in the employee's file.
- 4) Change of work assignment / transfer for either the perpetrator or the victim.
- 5) 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.

Confidentiality:

The Company 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.

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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 the Company except where disclosure is required under disciplinary or other remedial processes.

Protection to Complainant / Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.