

POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH) of ZINEMA MEDIA AND ENTERTAINMENT LIMITED

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1. PURPOSE

To create and maintain a safe work environment, free from sexual harassment and discrimination for all its employees. Establish guidelines as per the guidelines of “**The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.**”

2. SCOPE

ZINEMA MEDIA AND ENTERTAINMENT LIMITED aims to adopt zero-tolerance attitudes against any kind of sexual harassment or discrimination caused by any employee during their tenure in Zinema Media and Entertainment Limited towards any other person—being an employee of Zinema Media and Entertainment Limited, Client, Vendor, and Contractor—in Company premises or elsewhere in India or abroad.

3. APPLICABILITY

All employees of Zinema Media and Entertainment Limited.

4. DEFINITIONS

- **Employee of Zinema Media and Entertainment Limited:** Includes persons carrying out any work on behalf of Zinema Media and Entertainment Limited and may have been hired as Permanent, Temporary, Contracted, or on Retainer Ship Basis, part-time basis, etc., either directly or indirectly or through a vendor organization.
- **Sexual Harassment:** Harassment of a Female/Male employee consisting of any unwelcome sexually determined behavior, whether directly or indirectly, by any male/female in charge of the management or a male/female co-employee, either individually or in association with other persons, to exploit the sexuality of a co-employee to harass him/her in a manner which prevents or impairs his/her full utilization of benefits, facilities, or opportunities, or any other behavior which is generally considered to be derogatory.
- **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:** Employees against whom the complaint has been filed.

5. POLICY GUIDELINES

Sexual Harassment shall include, but not be limited to:

- Physical contact and sexual advances;
- Demand or request for sexual favors;
- Sexually-colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal, non-verbal, or written conduct of a sexual nature.

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6. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS

A complaint shall be submitted through **email to** or can be discussed during a meeting with any member of the **Internal Committee (IC)** mentioned herein within **3 months** of the occurrence of an act of Sexual Harassment.

Note: If the respondent is the direct supervisor of the complainant, or a person influencing the career growth of the complainant, the reporting structure will be changed until the enquiry is completed.

7. INTERNAL COMMITTEE (IC)

Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal Committee consisting of:

- **Presiding Officer:** 1 member
- **Internal Members:** 3 members
- **External Member:** 1 member (NGO/Legal expert)

Timeline and Enquiry Process

1. **Within 3 Working Days:** The IC shall commence an Official Internal Enquiry by:
 - Informing the respondent of the complaint.
 - Instructing the respondent to stop the alleged act immediately.
 - Informing the respondent not to reach out to the complainant directly or indirectly.
 - Asking for an immediate written explanation from the respondent.
2. **Within 5 Working Days:** The designated person shall respond in writing to the complainant informing him/her about the initial steps taken.
3. **Within 15 Days:** The IC shall record and communicate its prima facie findings to both parties after conducting fact-finding, truth verification, and counseling sessions.
4. **Within 1 Month:** The complaint will be closed, and the final decision will be recorded and shared with both parties.

8. REDRESSAL AND DISCIPLINARY ACTION

- a. An amicable resolution of the complaint is possible only with the written consent of the complainant.
- b. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.
- c. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.

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d. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.

e. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to:

- Warning
- Written apology from offender
- Bond of good behavior
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

9. MONITORING AND REVIEW

This Policy and Procedure will be reviewed whenever required. Reviews will be initiated by the HR Department. Changes in employment legislation will be reflected with immediate effect and communicated through HR.