

VLS Securities Limited

Policy on Prevention of Sexual Harassment of Women at Workplace

Commitment

Our Company is committed to provide a work environment that ensures every woman employee is treated with dignity. The Company is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual, mental or any other harassment and is committed to go to any length to ensure that.

Scope

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites.

Meaning of Sexual Harassment

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances or requests.

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 or 'joking' that is sex-oriented, any conduct that has the purpose or the effect of creating an intimidating, hostile or offensive work environment whether explicit or implicit.

Responsibility

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.

Complaint Mechanism

A women employee can directly approach the Presiding Officer of Internal Complaints Committee or any member of the Committee for registering a complaint, identity of the complainant shall be kept confidential at all times. The women employee includes women engaged in any capacity to whom this policy applies.

The '**Internal Complaints Committee**' is presently headed by Mrs. Neeraj Vinay Bansal - Director of the Holding Company along with additional two members having legal knowledge and one member who is familiar with issues relating to sexual harassment, for time-bound redressal of the complaint(s) made by such employee. The contact details of the presiding officer are as under:

Name : Mrs. Neeraj Vinay Bansal
Phone No.: 011-46656666
Email : neerajvinaybansal@yahoo.com
Address : H-304, Jaipuria Sunrise Green, Ahinsa Khand- 12/A, Indirapuram, Ghaziabad – 201014 (U.P.)

Anyone who abuses the procedure (by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action. However, simply not being able to prove an allegation will not mean that it is a false/malicious complaint.

Amendment

The Board has the right to amend this policy, whole or in part at any time without assigning any reason. In case of amendment in statutory provisions/ regulations necessitating amendment, the relevant portions of policy shall be deemed to have been modified from the date of amendment in relevant statutory provisions. In such case the modified policy shall be placed for review by the Board in regular course.