

KEY ELEMENTS OF ANTI-HARASSMENT & ANTI-DISCRIMINATION POLICY

1. Objective

PICG is committed to maintaining a safe, inclusive, respectful and professional work environment where all individuals are treated with dignity. The Policy aims to promote a workplace where there is zero tolerance for discrimination and harassment of any kind.

2. Scope

The Policy applies to all PICG employees, including persons acting on behalf of PICG and to third parties, outside organizations and individuals interacting with PICG employees. The Policy aims to prevent and address all kind of harassment including sexual harassment and discrimination based on factors such as gender, race, religion, age, disability, marital status, pregnancy and national origin.

3. Responsibility

Overall responsibility for implementing and overseeing the Policy rests with the Board of Directors, Board Human Resource Committee and Chief Executive Officer. The Human Resource Manager is responsible for receiving complaints and coordinating the reporting process, while the Internal Complaints Committee (ICC).

4. Complaint & Investigation Process

- Employees may report harassment, discrimination, or retaliation to Human Resource Manager (HR), including anonymously; no fixed reporting period applies to harassment complaints.
- Complaints are promptly and thoroughly investigated through interviews and review of relevant information.
- Complaints involving senior management or above are referred to an external party, while other cases may be managed internally through the ICC, as required to be formed under the '*Protection Against Harassment of Women at Workplace Act, 2010*'.
- The ICC assesses prima facie cases and recommends appropriate disciplinary or corrective action, with findings communicated to the parties within one month.
- All complaints and investigation records are treated confidentially and securely maintained by HR on a need-to-know basis.

5. Protection Against Retaliation

PICG maintains strict confidentiality of complaints and investigations and prohibits any form of intimidation, victimization or retaliation against individuals who raise concerns in good faith, participate in investigations or oppose conduct prohibited under the policy.

6. Disciplinary Measures

Harassment may result in disciplinary action, including verbal or written warning, adverse performance evaluation, suspension, or dismissal, depending on the severity of the misconduct.
