

Policy Document

Policy Name Prevention of Sexual Harassment

Policy Number TMJL/CA&L/Leg/0001

Version 2.0

Effective Date 01/Oct/2023

Revised Date 05/Dec/2025

Applies To All Showrooms and Office locations.

Exclusions -

Policy Details

Clause / Rule	Description
Purpose	To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. Establish guidelines as per the guidelines of "The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.
Scope	Thangamayil Jewellery Limited aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure in TMJL towards any other person being an employee of TMJL , Client, Vendor and Contractor pertaining to the organisation's premises in India or elsewhere in abroad.

Applicability All employees of Thangamayil Jewellery Limited.

Definition	I. Employee of Thangamayil Jewellery Limited – Includes person carrying out any work on behalf of Thangamayil Jewellery 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 vendor organization.
	II. Sexual Harassment – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behavior, whether directly, 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 co-employee to harass him/her in a manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory .
	III. Aggrieved Women - In relation to workplace, a woman of any age

Clause / Rule	Description
	whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent. IV. Respondent: Employees against whom the complaint has been filed. Sexual Harassment shall include but not limit to: -
Policy Guidelines	• Physical Contact & Sexual advances • Demand or request for sexual favors; • Sexually- colored remarks; • Showing pornography; • Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.
Grievance Mechanism	Complaint Procedure: A complaint shall be submitted through email to humanresource@thangamayil.com or can be discussed during the meeting with any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.
	Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of: ➤ Presiding Officer - 1 member ➤ Governing Member – 1 member (NGO / Legal expert) ➤ Legal Advisor – 1 member ➤ HR Representative – 1 member ➤ Internal Member - 6 members
Internal Committee	- Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by ICC in order to stop the alleged act(s) - Within 15 days from receipt of the complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s). - A complaint will be closed no later than one month from receipt of complaint by recording the decisions of the internal committee,

**Clause /
Rule****Description**

accordingly informing to the complainant and the Respondent of the same.

- d. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.
- e. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.
- 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.
- 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.

Redressal

- 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

**Clause /
Rule****Description**

➤ 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'.
applicable.

**Monitoring
& Review**

This Policy and Procedure will be reviewed whenever required from the date of implementation. Reviews will be initiated by the HR Department. Where changes in employment legislation occur that directly affect this Policy, these will be reflected with immediate effect and communicated through HR. This policy shall be read in conjunction with the Code of Conduct.

**Policy
Linkage**

Disciplinary Action Policy, Grievance Redressal/Whistle-blower Policy, and all other applicable HR and workplace safety policies, and shall be applied together with these documents in all matters relating to prevention, reporting, and redressal of sexual harassment.

Internal Complaints Committee

Name	Designation	Contact Details	Internal / External
V SUBHA	Secretary	9943313316	Presiding Officer
RAJKUMARI JEEVAGAN	Governing Member	9677957221	External
S ARIVALAGAN	Legal Advisor	9443729445	External
Dr C MADAN	HR Representative	9445034555	Internal
PANDEESWARI S	Employee Representative	6374277017	Internal
KALAIARASI S	Employee Representative	6385579200	Internal
RUBHA PAULIN K	Employee Representative	7871658186	Internal
PANDI KHANIMOLI	Employee Representative	9003989317	Internal
MAHALAKSHMI S	Employee Representative	8610132980	Internal
SWETHA RAMANATHAN	Employee Representative	9566662741	Internal

Prepared

Verified

Approved