

VIACOM18 MEDIA PRIVATE LIMITED

SEXUAL HARASSMENT POLICY

Version 1.2

Approved 1st November, 2013

Revised 1st April, 2019

The Company follows the mandate of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “**Sexual Harassment Act**”) and has constituted a committee to deal with matters pertaining to sexual harassment. The company’s sexual harassment committee, referred to as “**Internal Committee**” or “**IC**” currently consists of:

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|----------------------------|---------------------------|
| - Ms. Nina Jaipuria | Chairperson |
| - Ms. Kshipra Jatana | Member |
| - Mr. Harshvardhan Mundhwa | Member |
| - Ms. Sonal Mattoo | External Member |
| - Mr. Rahul Chakravarti | Member (East Region) |
| - Ms. Nupur Sood | Member (North Region) |
| - Ms. Subhra Nag | Member (Chennai Region) |
| - Ms. Chitrasri Sunder | Member (Bangalore Region) |

What is sexual harassment?

Sexual harassment may exist where compensation or other employment benefits are conditioned on granting sexual favours. Sexual harassment may also consist of a pattern of unwelcome sexual advances or unwanted visual, verbal or physical conduct of a sexual nature.

To determine if your behaviour could be unwelcome to another person, remember that “unwelcome” is decided by the recipient of the behaviour, not the person doing the behaviour. Therefore, it is the impact of behaviour, not the intent of the person who did the behaviour that determines if harassment has occurred.

However, please note that the normal exercise of supervisory and management responsibilities, including coaching, performance reviews, work evaluation and disciplinary action does not constitute sexual harassment.

Specifically, sexual harassment constitutes the following:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations or comments, questions about a person’s sexual practices, or gossiping about sexual relations, remarks about an individual’s body, colour, physical characteristics, or appearance;

- Visual conduct such as derogatory and/or sexually-oriented posters, offensive or obscene photography, cartoons, drawings or gestures, display of sexually suggestive or lewd objects;
- unwelcome notes or letters or emails, and any other written or graphic material that denigrates or shows hostility or aversion toward an individual because of a particular characteristic, that is placed on walls, bulletin boards, or elsewhere on Viacom 18's premises or circulated in the workplace;
- Physical conduct such as physical interference with normal work, assault, unwanted touching, blocking normal movement or unwelcome physical contact, leering at a person's body, and threatening, intimidating or hostile acts that relate to a particular characteristic;
- Retaliation for having reported or threatened to report harassment, or for opposing unlawful harassment, or for participating in an investigation;
- When submission to the conduct is made a term or condition of the individual's employment-either explicitly or implicitly.
- Asking for dates, or make sexual advances, when it is clear—or becomes clear—that the overture is unwelcome.
- Engage in any conduct of an overtly sexual nature, whether welcome or unwelcome.

What to do if you have a complaint?

Viacom18 requires all employees to report immediately any incidents of sexual harassment or retaliation that they experience or observe regardless of the offender's identity or position. All claims will be promptly and thoroughly investigated.

Manner of reporting:

Sexual harassment cases will be dealt with in the manner prescribed under the Sexual Harassment Act. Any aggrieved employee can make a complaint of sexual harassment at the workplace, in writing, to the IC (icc@viacom18.com) or any member of the IC, within a period of 3 months from the date of the alleged incident of sexual harassment, and in case of a series of incidents, within a period of 3 months from the last alleged incident of sexual harassment.

- The current members of IC are:
- Ms. Nina Jaipuria Chairperson Nina.Jaipuria@viacom18.com
- Ms. Kshipra Jatana Member Kshipra.Jatana@viacom18.com
- Mr. Harshvardhan Mundhwa Member Harshvardhan.Mundhwa@indiacast.com
- Ms. Sonal Mattoo External Member sonal.mattoo@helpinghands.org.in
- Mr. Rahul Chakravarti Member(East Region) Rahul.Chakravarti@viacom18.com
- Ms. Nupoor Sood Member (North Region) Nupur.Sood@viacom18.com
- Ms. Subhra Nag Member (Chennai Region) Subhra.Nag@viacom18.com
- Ms. Chitrasri Sunder Member(Bangalore Region) Chitrasri.Sunder@viacom18.com

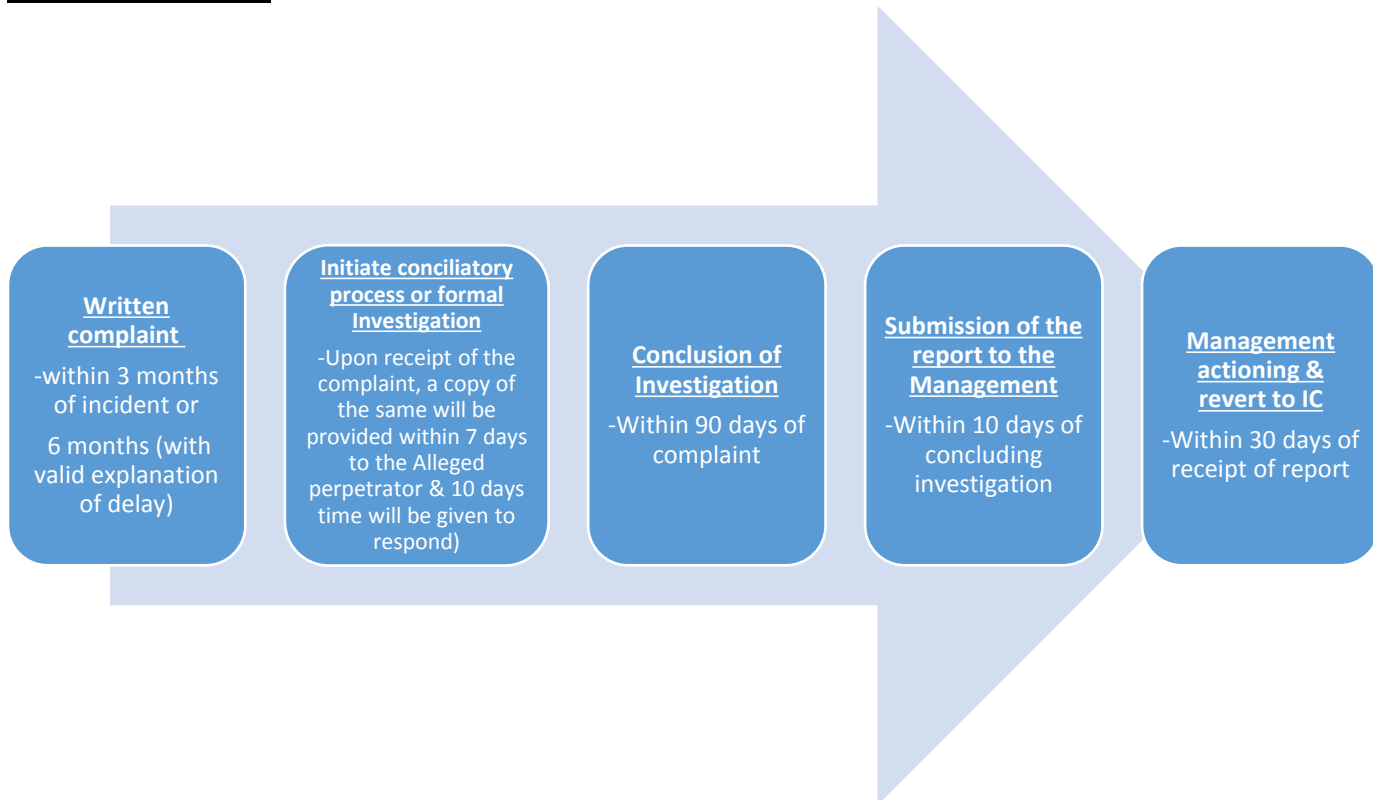
Where the aggrieved employee is not comfortable with making a complaint in writing, he/she may approach any member of the IC, who will render all reasonable assistance to the aggrieved employee for making the complaint. The complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses. All such complaints will be investigated thoroughly by the IC in the manner prescribed under the Sexual Harassment Act.

Redressal mechanism in case of sexual harassment complaints

Upon receiving a complaint, the IC may take steps to settle the matter between the parties through conciliation, if requested by the complainant. In case conciliation is not possible or where it does not work out, the IC will investigate the complaint in the manner prescribed under the Act, for which purpose it will meet as soon as is practicable, upon receiving the complaint. The committee shall have the powers to call any person and record their statements and make such investigation as may be necessary to decide as to the truth or falsity of the complaint. In the event there is a prima-facie case against the complainant, the committee may investigate the allegations and charges through the mechanism of a departmental enquiry, which shall be conducted in accordance with the principles of natural justice and in accordance with the provisions of the Act. In such a situation, the report of the committee shall be deemed to be the enquiry report under the disciplinary rules applicable to the employees. In the event the committee comes to a conclusion that the complaint is true, it shall advise the CEO in writing on initiating disciplinary action. Thereafter, it shall be

for the CEO to initiate disciplinary action and impose necessary punishment that may include the termination of services, depending on the gravity of the misconduct. However, if the committee receives a complaint which upon investigations is found to be false, appropriate disciplinary action and punishment may be imposed against the employee making the false complaint.

Process Milestones:



The Company strictly prohibits any sort of retaliation against the Complainant or any witnesses. Any act of reprisal, including internal interference, coercion and restraint, by the alleged offender whether directly or indirectly, will result in appropriate action against the alleged offender by the Company.

The Company will make every reasonable effort to maintain the confidentiality of all parties involved in any proceedings under this Policy. Information will be disclosed only to those having a need to know in order to facilitate the resolution. Any disclosure of information, other than on a need-to-know basis as described above, will constitute a breach of confidentiality and will result in disciplinary action, up to and including termination.

Any Viacom 18 employee who violates this policy will be subject to disciplinary action, up to and including termination of employment. In addition, employees found to have engaged in unlawful harassment may be held personally liable for such conduct. This policy covers all managers, employees, consultants, independent contractors, vendors, clients, and other partners with whom Viacom 18 conducts business.

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.