

THE POLICY DISPLAYED WAS APPROVED BY THE ERSTWHILE BOARD OF DIRECTORS OF THE COMPANY IN ITS MEETING HELD ON 5TH DECEMBER 2024, THIS POLICY HAS BEEN PUBLISHED ON THE WEBSITE OF THE COMPANY TO COMPLY WITH REGULATION 46 OF THE SEBI (LODR) REGULATIONS, 2015. THE BOARD OF THE COMPANY MAY MODIFY, ADD, DELETE OR AMEND ANY OF THE PROVISIONS OF THIS POLICY TIME TO TIME.

ICODEX PUBLISHING SOLUTIONS LIMITED
Anti-Harassment and Anti-Discrimination Policy

1. Introduction

iCodex Publishing Solutions Limited (“the Company”) recognizes that a safe, inclusive, and respectful workplace is essential for fostering a productive environment. Harassment and discrimination can undermine employee morale, damage relationships, and ultimately impact the Company's success. Therefore, this Anti-Harassment and Anti-Discrimination Policy is instituted to prevent such behaviors, promote diversity in the workplace, and ensure fair treatment for all employees.

2. Objective

The primary objective of this policy is to cultivate a positive work environment in which all individuals, regardless of background or characteristic, are treated with dignity and respect. This policy delineates the Company's firm stance against harassment and discrimination and outlines the procedures for effectively and confidentially addressing complaints.

3. Scope

This policy applies universally to all employees, contractors, interns, and anyone associated with the Company in any capacity. The provisions cover harassment and discrimination based on various protected characteristics, including but not limited to:

- Race
- Gender
- Religion
- Sexual orientation
- Age
- Disability
- Any other characteristic safeguarded by applicable laws and regulations.

4. Definitions

4.1 Harassment: Refers to unwelcome conduct that can be verbal, physical, or visual in nature and which creates a hostile, intimidating, or offensive work environment. This can include, but is not limited to, derogatory comments, jokes, or any behavior that instills fear or discomfort.

4.2 Discrimination: Involves treating individuals unfairly or inequitably based on personal characteristics such as race, gender, age, religion, disability, or any characteristic protected by law. This can manifest in various forms, including unequal job assignments, promotions, or pay.

4.3 Sexual Harassment: Includes unwanted sexual advances, requests for sexual favors, and any other verbal or physical conduct of a sexual nature that affects employment conditions or contributes to an intimidating or hostile work environment. This also encompasses situations when such conduct occurs between employees of any gender or between employees and non-employees, such as clients or vendors.

5. Reporting Mechanism

The Company promotes a culture in which employees may report any incidents of harassment or discrimination without fear of retaliation. To facilitate this, employees can report incidents to:

- Their immediate supervisors
- The Human Resources department
- Designated grievance channels established by the Company

All complaints will be treated with urgency and confidentiality to protect the complainant's privacy.

6. Investigation Process

Upon receipt of a complaint, the Company commits to conducting a thorough, fair, and impartial investigation. The steps involved will include:

- **Initial Assessment:** Evaluating the reported incident to determine the appropriate course of action.
- **Interviews:** Speaking with the complainant, the accused, and any witnesses or relevant parties to gather facts.
- **Documentation Review:** Analyzing any relevant documentation, including emails, messages, or company records related to the complaint.
- **Confidentiality Assurance:** Maintaining confidentiality throughout the process to the extent possible while still conducting a comprehensive investigation.

If warranted, the Company will take corrective action based on the investigation's findings.

7. Disciplinary Action

Employees found guilty of engaging in harassment or discrimination will face disciplinary actions that may include:

- Verbal or written warnings
- Suspension from work
- Termination of employment
- Legal actions, when warranted by the severity of the violation

The severity and frequency of the misconduct will determine the level of disciplinary action.

8. Responsibilities

The Human Resources department is charged with implementing this policy, raising awareness among employees, and ensuring compliance. All employees share the responsibility to uphold the principles of respect and inclusion and are encouraged to report any violations they may witness.

9. Training and Awareness

The Company will conduct regular training sessions to educate employees on their rights and responsibilities concerning harassment and discrimination. Awareness programs will be designed to foster a culture of respect, inclusivity, and support within the workplace, ensuring that all employees are equipped with the knowledge to recognize and respond to inappropriate behavior.

10. Review of the Policy

This policy shall undergo periodic reviews to ensure its continued effectiveness and compliance with evolving legal standards. Any modifications to the policy must be approved by the Board of Directors to ensure the policy remains robust and applicable to all employees.