

**POLICY FOR PREVENTION OF SEXUAL HARASSMENT OF WOMEN
AT WORKPLACE**

Preface:

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

Definitions:

1. Sexual Harassment:

Sexual Harassment shall include any one or more of the following unwelcome act or behaviour (whether directly or indirectly) namely:

- Physical contact or advances OR
- A demand or request for sexual favours OR
- Making sexually coloured remarks OR
- Showing pornography OR
- Any other unwelcome physical, verbal or non- verbal conduct of sexual nature.

The following circumstances among other circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- i. Implied or explicit promise of preferential treatment in her employment or;
- ii. Implied or explicit promise of detrimental treatment in her employment or;
- iii. Interference with her work or creating an intimidating or offensive or hostile work environment for her or;
- iv. Humiliating treatment likely to affect her health and safety.

2. Workplace:

Workplace in connection with the Company shall mean the administrative office of the Company and such other place which the employee may visit during the office hours arising out of or in course of employment including transportation provided by the Company for undertaking such journey.

Internal Complaints Committee:

The Company has instituted Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following four members:

- Presiding Officer: Woman employee at the level of General Manager or above
- Senior Woman Employee from Human Capital Management (Member)
- Senior Male Employee not below the rank of General Manager (Member)
- Any Senior female employee (Member)
- External Member with relevant experience (Member)

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

Responsibilities of the Committee:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the respective business head in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

Redressal Mechanism:

1. Every woman employee of this Company shall have a right to make a complaint to the Committee within a period of three months from the date of the incident or last incident of sexual harassment as the case may be.

2. In compliance with the Act, if the complainant's warrants formal intervention, the complainant needs to lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this policy. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained.

3. The time period of three months may be extended by the Committee if it is satisfied that the circumstances prevented were such that it prevented the woman from filing the complaint within the stipulated time.

4. During the pendency of the enquiry, the woman employee may request for safety / relief measures.

5. If the respondent (person against whom the complaint is made) is proved guilty, he shall be liable to be prosecuted. The Committee shall prepare a report about the complaint and submit the same to the Management for necessary action. The decision taken by the Executive Chairman in this matter shall be final and binding.

Malicious Allegations:

If the Committee arrives at a conclusion that the allegation / complaint made by the woman employee is false or the woman employee has produced forged or misleading evidence, it may recommend to the Management, an action against such complainant. Mere inability to provide adequate proof shall not attract this provision. The malicious intention of the complainant needs to be established.

Confidentiality:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act
