

# **POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE**

## **I. COMMITMENT**

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and equitable treatment. The Company provides a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

## **II. SCOPE**

This policy applies to all categories of employees of the Company, including permanent management and temporary workmen, trainees and employees on contract. The Company will not tolerate sexual harassment, of any form and at any workplace of the company.

The workplace includes all offices or other premises where the Company's business is conducted.

## **III. DEFINITION OF SEXUAL HARASSMENT**

Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:—

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

This definition is as per The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

## **IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

## **V. COMPLAINT MECHANISM**

An appropriate complaint mechanism in the form of **"Internal Complaints Committee" (ICC)** has been created in the Company for time-bound redressal of the complaint made by the victim.

## **VI. INTERNAL COMPLAINTS COMMITTEE**

The Company has constituted an Internal Complaints Committee, as per the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Internal Internal Complaints Committee is responsible for:

- Investigate every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment related sexual harassment

## **VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT**

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

### **A. Informal Resolution Options**

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaints Committee for redressal of their grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### **B. Complaints**

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, within three months from the date of occurrence of the alleged incident or in case of series of incidents within three months from the date of last incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
2. The Presiding Officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Internal Complaints Committee.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

#### **VIII. CONFIDENTIALITY**

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

#### **IX. ACCESS TO REPORTS AND DOCUMENTS**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

#### **X. PROTECTION TO COMPLAINANT / VICTIM**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

#### **XI. CONCLUSION:**

In conclusion, the Company commits to provide its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.