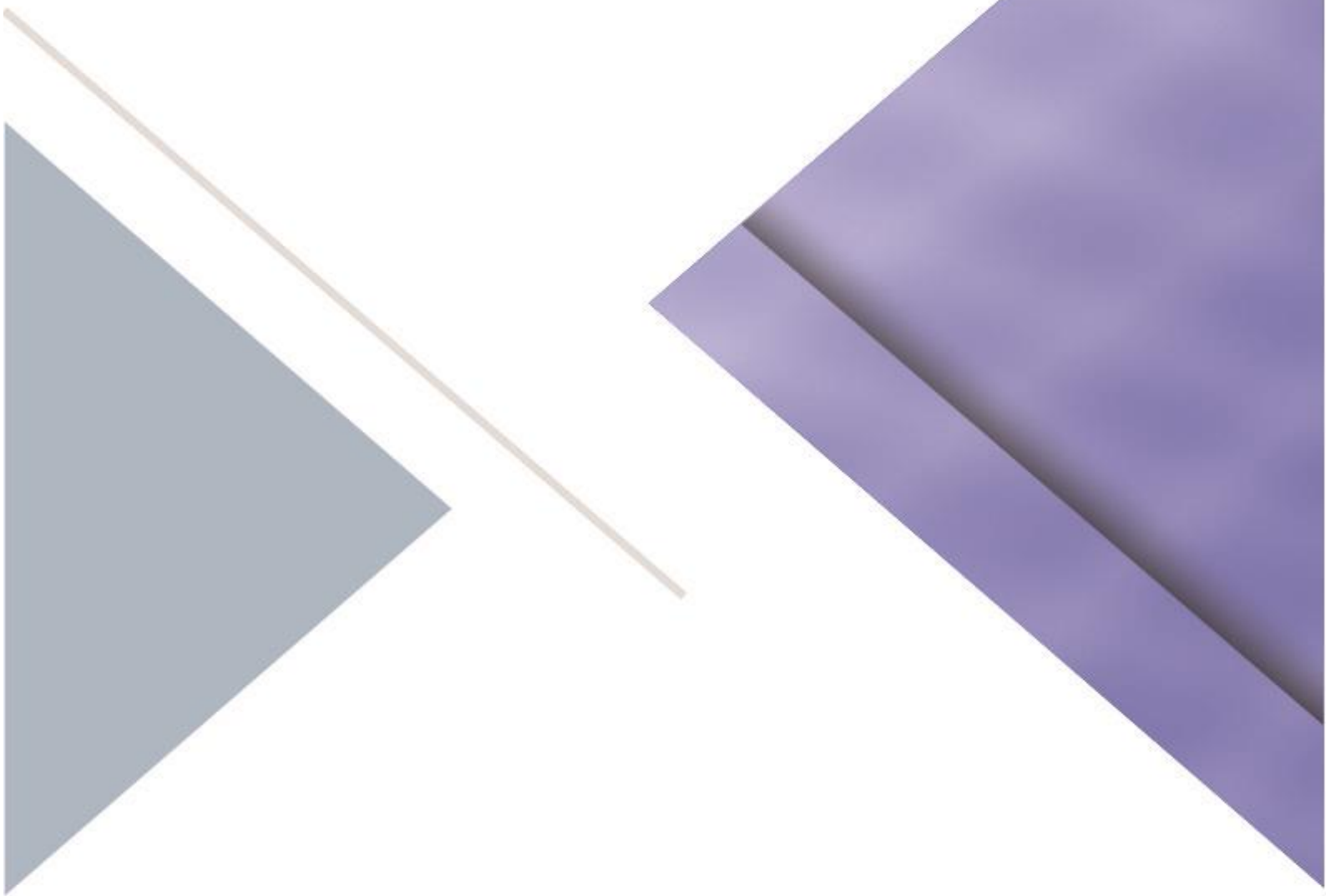


Prevention of Sexual Harassment



Policy on Prevention of Sexual Harassment

1. **Background:**

Company believes in “**Respect for all stakeholders**” in letter and spirit be it colleagues, customers and others, On the work front environment across all levels of its business operation, it always endeavors to put in place a good and dignified work environment, so as to ensure affordable and equitable treatment of employees.

With this sense, the Company bears Zero tolerance on any form of Sexual harassment, especially in behavior towards women at the workplace.

The primary of objective of this policy is to provide protection against sexual harassment of women at workplace and for prevention and redressal of complaints of sexual harassment and for matters connected therewith.

2. **Applicability of the Policy:**

The policy applies to all employees of the company:

- Full-time
- Part-time
- Trainees
- Employees on contractual basis

The company will not also tolerate sexual harassment, if engaged in by suppliers or any other business associates.

The workplace includes:

- i) All offices, branches or other premises where it carries on its business activities.
- ii) All company-related activities performed at any other site away from Company's Premises.

3. **Definition of “Sexual Harassment”:**

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

- i) Physical contact and advance; or

- ii) A demand or request for sexual favors; or
- iii) Making sexually colored remarks; or
- iv) Showing pornography
- v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature:

4. Compliant Authority and its Structure:

An internal Complaints Committee is to be formed for redressal of Sexual harassment complaint made by any victim and for ensuring time bound resolution of such complaint

At the initial stage the Internal Complaints Committee shall consist of following members:

- i) Presiding Officer: a woman employee from senior level and shall hold office for such a period, not exceeding three years, from the date of their nomination as may be specified by the employer;
- ii) Two Members: from amongst employee preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- iii) One member from amongst NGO or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment , and shall be paid such fees or allowance for holding the proceedings of the Internal Complaints Committee, by the employer as may be prescribed

Provided that at least one half of the total Members so nominated shall be women.

Presiding officer or any other Member of the Committee in terms of Section 16 of The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 , shall not notwithstanding anything contained in the Right to Information Act, 2005, the contents of the Complaints made under Section 9, the Identity and address of the aggrieved woman, respondent and witness , any information relating to conciliation and inquiry proceedings, recommendation of the Internal Complaint Committee and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner.

Disqualifications:

Where the Presiding or any Member of the Internal Complaint Committee

- a) Contravenes the provision of Section 16 as written above: or
- b) Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her: or

- c) Has been found guilty in any disciplinary proceedings or a disciplinary proceedings is pending against him/her: or
- d) Has so abused his position as to render his continuance in office prejudicial to the public interest.

Such presiding officer or Member, as the case may be, shall be removed from the committee and the vacancy shall be filled by fresh nomination.

5. Resolution, Settlement or Prosecution System:

The Company endeavors to put in place a robust resolution, settlement and prosecution system to deal with internal Sexual harassment issues in the following ways

A. Informal Resolution Process:

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 Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Lodging of Complaints with Internal Complaints Committee:

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, submitted within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident.

The Complaints Committee can extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of 3 months.

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.

Employees may also write directly to the other officer as may be prescribed.

2. The Presiding Officer of the Internal Complaints Committee shall determine whether the allegations 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 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.
5. The Complaints Committee shall conduct such investigations in a time bound manner and shall submit a written report containing the findings and recommendations on action to be taken to the "Whistle Blower Officer" appointed by the Company as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Whistle Blower Officer, Head- Personnel & Administration and the COO of the Company will jointly take decision on the corrective action based on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
 - b. Counselling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - e. Suspension or termination of services of the employee found guilty of the offence
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

7. Maintaining Confidentiality and Secrecy:

To protect the self-respect of the victim, the accused person and other person involved to report the incident of Sexual harassment, confidentiality and secrecy to be maintained throughout the Investigation process. All complaints, records, contents of meeting, result of Investigation and other necessary material will be kept confidential by the company.

8. Preparation of Annual Report :

Internal Complaints Committee in each calendar year shall prepare under section 21 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 an Annual Report and shall have the following details:

- a) number of complaints of Sexual harassment received during the year ;
- b) number of complaint disposed off during the year;
- c) number of cases pending for more than ninety days;
- d) number of workshop or awareness programme against sexual harassment carried out;
- e) nature of action taken by the employer or District Officer.

9. Conclusion :

All complaints in the matter of Sexual harassment shall be handled and investigation will be conducted with the strict principle of fairness, impartiality, natural justice and full of confidentiality. The identity and address of the victim, respondent and witnesses must not be disclosed to the media or public.