



Preventing



ABOUT THE POLICY:

- The Company's POSH (Prevention of Sexual Harassment) Policy is aligned to the new Indian Law of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.
- Under the Act, Women employee/aggrieved women includes Permanent, Temporary worker, Contract Worker, Part-Time, Trainee, Apprentice, Probationer, Consultant, Client, Customer, Supplier.
- Workplace as per Definition includes Office, Warehouse, Showroom, Factory/manufacturing Unit including employees in transportation on way to work.

COMMITMENT:

The Company is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment and to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.

The Company's Sexual Harassment Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

SCOPE:

This policy applies to all categories of employees of the Company including permanent management and workmen, temporary trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates

The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All company related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relation

DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- ❖ unwelcome sexual advances (verbal, written or physical)
- ❖ demand or request for sexual favours
- ❖ any other type of sexually oriented conduct
- ❖ verbal abuse or 'joking' that is sex-oriented any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.
- ❖ Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories - quid pro quo and creation of a hostile working environment

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

If you are being harassed:

- Tell the accused that his/her behaviour is unwelcome and ask him/her to stop.
- Keep a record of incidents (dates, times, locations possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- File a complaint as soon as possible. If, after asking the accused to stop his/her behaviour, the harassment continues, report the abuse to the Internal Complaints Committee ('ICC') formed for this purpose.

INTERNAL COMPLAINTS COMMITTEE

The Company has instituted a 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 out of which at least three members will be women:

<u>Sr.no</u>	<u>Designation</u>	<u>Name of Officer</u>
1	Presiding Officer	Ms Anushree Kore
2	Member	Ms Hemangi Yadav
3	Member	Mr Shrikant Nibandhe
4	Member	Ms Deepika Panicker

PROCEDURE FOR DEALING WITH THE COMPLAINT

- It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the ICC of any instance or behaviour or sexual harassment by a co-worker towards another employee.

- The concerned employee shall give his complaint in writing to the Presiding Officer of the Committee giving details of the incident within a week of its occurrence.
- Once the complaint is received, it will be kept strictly confidential.
- The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerate.
- The Committee shall ensure that a fair and just investigation is undertaken immediately. Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily,
- The ICC after receipt of the Complaints, conduct enquires, handle, deal with the complaints, call for written explanation, call upon and examine any/all witnesses mentioned by the complainant and accused, initiate corrective actions, resolve the disputes, lodge complaints with appropriate authorities and to initiate all action and to do all acts and things under the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder read with Indian Penal Code, 1860, Code of Criminal Procedure 1973 and all other acts/rules/regulations as may be applicable from time to time.
- The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of harassed as claimed the accused will be disciplined accordingly.
- The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer.

DISCIPLINARY ACTION

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the Complainant.

CONFIDENTIALITY

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action. 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.

CUSTODY/ACCESS TO REPORTS AND DOCUMENT

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

COMPLAINTS MADE WITH A MALICIOUS INTENT

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have as forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

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

CONCLUSION:

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