



POLICY ON PREVENTION OF SEXUAL HARASSMENT

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1. INTRODUCTION:

Shreyas Intermediates Limited ((hereinafter referred to as "SIL" or "the Company")) is committed to provide equal opportunity and harassment free workplace and considers any sexually coloured remarks or actions as a serious offence and will take stringent action against the offenders when found guilty.

The policy is drafted as per the the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as "the act").

The Company shall take all steps to prevent or deter the commission of acts amounting to sexual harassment and to provide the procedures for the resolution, settlement or prosecution of acts of sexual harassment.

2. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites.

The workplace includes:

- a. All offices or other premises where the Company's business is conducted.
- b. All company-related activities performed at any other site away from the Company's premises.
- c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

3. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:–

- a. physical contact and advances; or
- b. demand or request for sexual favours; or
- c. making sexually coloured remarks; or
- d. showing pornography, or
- e. any other unwelcome physical, verbal or non-verbal conduct of sexual nature; or

- f. any conduct that has the purpose or the effect of interfering with an individual's work performance; or
- g. 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.

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. The Company recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

4. ROLES & RESPONSIBILITIES

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. It is the responsibility of all to respect the rights of others and to never encourage harassment. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior

All managers at Company must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that:

- harassment will not be tolerated;
- complaints will be taken seriously; and
- the complainant, respondent/s, or witnesses are not victimized in any way.

5. COMPLAINT MECHANISM:

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of an "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaints made by the victim.

6. INTERNAL COMPLAINTS COMMITTEE:

The Company has instituted an Internal Complaints Committee (hereinafter referred to as the "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 Committee will comprise of the following four members out of which at least 3 members will be women:

- Presiding Officer: A woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- One external member, familiar with the issues relating to sexual harassment
- At least one half of the total members is women

7. COMPLAINT RESOLUTION PROCEDURES:

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 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. COMPLAINTS:

a. 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 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.

b. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment. The Presiding Officer of the 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.

c. If the Presiding Officer of the 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.

d. 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.

e. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Employer as soon as practically possible and in any case, not later than 10 days from the date of completion of inquiry. The Employer shall act upon the recommendation within 60 days of its receipt by him/her.

f. The Committee's report will also be made available to concerned parties.

g. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

C. CONCILIATION:

The Committee may, before initiating an inquiry and at the request / demand of the aggrieved employee, take steps to settle the matter between the aggrieved and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation. Such conciliation should be completed within one month from the date of making the complaint.

8. 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.

9. 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.

10. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed in 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.

11. AWARENESS:

- a. All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the Human Resources team.
- b. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the Company during their initial Induction.
- c. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.
- d. Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

12. MISCELLANEOUS:

- I. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees.
- II. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
- III. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
 - a. Number of complaints of sexual harassment received during the year;
 - b. Number of complaints disposed off during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the employer.

13. CONCLUSION:

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

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

