

POLICY ON SEXUAL HARRASSMENT OF WOMEN AT WORKPLACE

Pursuant to The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act,
2013

POLICY ON SEXUAL HARRASSMENT OF WOMEN AT WORKPLACE

Draft Revised Policy on November 13, 2018

1 APPLICABILITY & SCOPE:

The Policy applies to any person engaged or otherwise, at all workplaces of the company including places visited / dwelling places arising out of or during the course of employment.

2 DEFINITION OF SEXUAL HARASSMENT:

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

- i. Physical contact and advances;
- ii. A demand or request for sexual favours;
- iii. Making sexually coloured remarks;
- iv. Showing pornography;
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

3 THE INTERNAL COMPLIANTS COMMITTEE (ICC) FOR REDRESSAL OF SEXUAL HARASSMENT COMPLAINTS:

The ICC at for Registered Office, Corporate Office as well as all offices located at Mumbai and for factory at Atgaon and Chalisgaon." (For a period of Three Years)

- Ms. Mansi Trivedi – Presiding Officer;
- Ms. Sonam Gupta – Secretary;
- Ms. Ashwini Lokhande– Member;
- Ms. Neeta Mane – Member;
- Ms. Poonam Doshi – Member;
- Ms. Ranjana Rajan – Member.

3.1 TENURE:

Maximum Three Years, Committee can be reconstituted by the Management from time to time.

3.2 QUORUM:

Three (Presiding Officer and Two Lady member must)

4 PROCEDURE FOR FILING A COMPLAINT:

- 4.1** The complaint shall be made by an aggrieved woman or by her legal heir to ICC in writing within a period of three months from the date of occurrence of incident.
- 4.2** Six copies of the complaint along with supporting document and names and addresses of the witnesses shall be sent either by post or given in person to any member of ICC of the establishment. A register shall be maintained to endorse the complaint received.

- 4.3 In case of delay in filing a complaint, and if the ICC is satisfied with the circumstances for the delay, it may extend further the time-limit not exceeding three months for filing a complaint and record the reasons in writing.

5. PROCEDURE FOR INQUIRY INTO COMPLAINT:

- 5.1 The ICC shall hold a meeting with aggrieved woman within 5 working days on receipt of complaint, but not later than a week.
- 5.2.1 The ICC may, before initiating an inquiry and at the request of aggrieved party, take steps to settle the matter with no monetary settlement as a basis of conciliation.
- 5.2.2 The copies of the settlement arrived during conciliation shall be provided to both the parties, and no further inquiry shall be conducted.
- 5.2.3 In case the terms of conciliation have not been complied, initiate the action as mentioned herein below 5.3
- 5.3 The ICC will go through the complaint against employee, and initiate a detailed inquiry as deemed fit according to the provisions of service rules, while for police, within a period of seven days.
- 5.4 During the pendency of an inquiry, on a written request by an aggrieved woman, the ICC may recommend to the Management:
- I. Transfer of aggrieved woman or the respondent
 - II. Grant leave to the aggrieved woman up to 3 months
- 5.5 For the purpose of making an inquiry, the ICC shall have the same powers as are vested as a Civil Court for the purpose of any inquiry.
- 5.6 The ICC shall submit its recommendations to the Management within a period of ninety days and the same shall be implemented within sixty days.

6 GUIDELINES FOR ICC WHILE RECOMMENDING ACTIONS:

- 6.1 The ICC shall investigate every complaint of sexual harassment and determine the allegation made under the complaint falls under the purview of sexual harassment.
- 6.2 To conduct the inquiry as per the principles of natural justice and in confidential manner.
- 6.3 In cases where compensation to be paid to aggrieved woman, then ICC shall inform to the Management to deduct the said amount from the salary of the respondent and pay to aggrieved woman or her legal heir/s.
- 6.4 In case respondent fail to pay the sum referred, the ICC may forward the order for recovery of the sum as an arrears to the concerned District Officer.

- 6.5 In case allegation against respondent are concluded to be false / malicious, the ICC may refer to the Management to take action against complainant.

7 MANAGEMENT'S OBLIGATIONS:

- 7.1 To provide assistance to file a police complaint, where the perpetrator is not an employee of the establishment.
- 7.2 To monitor the timely submission of report by ICC in the prescribed format of the Act / Rules and the same is submitted to District Officer.
- 7.3 Reconstituting the ICC, in case inquiry under any law is pending against ICC member of convicted for an offence.

8 CONFIDENTIALITY:

All records of complaints, including contents of meetings, results of investigation and other relevant material shall be kept confidential, except where disclosure is required under disciplinary or other remedial process.

9 ENFORCEMENT:

This policy will come into force with immediate effect.

Murarilal Mittal
Managing Director
(DIN: 00010689)