

GRAUER & WEIL (INDIA) LTD.

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES

COMMITMENT:

Our Company is committed to provide a work environment that ensures that every employee is treated with dignity and respect and afforded equitable treatment to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company, have the right to be treated with dignity.

Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable. 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.

The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 also requires formation of a committee and institution of other mechanisms on this issue.

SCOPE:

This policy applies to all categories of employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants/retainers.

Sexual harassment would mean and include any of the following:-

- Unwelcome acts or behavior at workplace, direct or implied, of:
 - physical contact, advances or stalking or
 - demand or request for sexual favours, or
 - making sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, or
 - showing pornography pictures, films or other display material, or
 - any other unwelcome physical, verbal or non-verbal conduct of sexual nature such as:
 - lurid stares, sounds, Eve teasing, innuendos and taunts,
 - physical confinement against one's will and likely to intrude upon one's privacy.
 - Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex.
- Following circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:
 - Implied or explicit promise of preferential treatment in her employment, or
 - Threat of detrimental treatment in her employment, or

Informal Resolution Options:

- When an incident of sexual harassment occurs, the victim of such conduct should communicate 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, she/he can bring her/his concern to the attention of the Complaints Committee for redressal of her/his grievances. The Complaints Committee will thereafter provide advise or extend support as requested and will undertake prompt investigation to resolve the matter.

Complaints:

- Any 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 Chairperson of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose her name, department, division and location she/he is working in, to enable the Chairperson to contact her/him and take the matter forward.
- The Chairperson 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 mean an offence of Sexual Harassment, she/he will record this finding with reasons and communicate the same to the complainant.
- If the Chairperson of the Complaints Committee determines that the allegations constitute an act of sexual harassment, she/he will proceed to investigate the allegation with the assistance of the Complaints Committee.
- If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies. The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

- 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.
- The Complaints Committee shall conduct such investigations in a timely manner of maximum three months and shall submit a written report containing the findings and recommendations to the CEO & Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The CEO & Director will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- In case the Committee find the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

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.
- f. Any other, as thought appropriate by the Complaints Committee.

In case the complaint is found to be false or frivolous, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management as recommended by the Complaints Committee.

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 any investigatory process to the extent practicable and appropriate under the circumstances.

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.

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 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.

FRIVOLOUS COMPLAINT:

On a preliminary or detailed investigation, if the Complaints Committee concludes that the complaint was frivolous, the Chairperson of the committee may take or recommend the following action against the complainant:

- a. Reprimand
- b. Counselling
- c. Written warning to the complainant and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer of the complainant.
- e. In the case of a false/frivolous complaint of serious nature or repeated false/frivolous complaints - suspension or termination of services of the complainant or such other disciplinary action as the management may deem fit.
- f. Any other, as thought appropriate by the Complaints Committee.

CONCLUSION:

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

**Annexure - I
PROCESS FLOW**

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