

Title: APAR Policy for Prevention of Workplace Harassment
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Policy for Prevention of Workplace Harassment

1. Objective :

This policy lays down the guidelines to be followed for prevention of work-place harassment (other than Sexual Harassment) to employees across all locations in APAR.

2. Scope :

This policy applies to all employees across all Divisions and locations. Incidents of Sexual harassment is out of the purview of this policy, which is to be dealt in accordance with the Policy for the Prevention of Sexual Harassment at the Workplace.

3. Definition:

Harassment: Harassment (other than Sexual Harassment) means any improper behavior by a person that is directed at, and is offensive to, another individual and which the person knew or ought to have known, would be offensive. It comprises objectionable or unacceptable conduct that demeans, belittles or causes personal humiliation or embarrassment to an individual. Mildly offensive comments or behavior can rise to the level of harassment if they are repeated; a single incident can be considered harassment if it is so severe that it has a lasting negative impact on the individual concerned.

Although harassment may occur more often between persons of different levels of authority, it may also occur among peers. When behavior of this kind is engaged in by any person who is in a position to influence career or employment conditions (including hiring, assignment, contract renewal, performance appraisal or promotion) of the recipient, it also constitutes an abuse of authority.

4. Guidelines :

- APAR requires the highest standards of integrity from employees. APAR ensures that its employees are treated, and treat each other, with dignity and respect, free from abuse or harassment.
- APAR will not tolerate any type of harassment within the workplace. APAR' strategy is to place the emphasis on prevention through awareness and training programs.

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- In the event that harassment occurs, this policy provides the means for intervention on informal and formal levels. All allegations of harassment will be fully, fairly and promptly dealt with in a confidential manner.
- Harassment can take many different forms and may include among others:
 - degrading tirades by a supervisor or colleague;
 - continual unjustified and unnecessary comments or deliberate insults related to a persons' professional competence;
 - threatening, abusive or insulting comments, whether oral or written;
 - deliberate desecration of religious and/or national symbols;
 - malicious and unsubstantiated complaints of misconduct against other employees;
 - mimicking, making fun or belittling;
 - continual interference with a persons' work space, work materials, equipment, etc.;
 - continual and unfounded refusal of leave application or training;
 - display of posters, pictures, electronic images or written materials which are offensive, obscene or objectionable;
 - continual exclusion of a person or group from normal communication, work or work related social activities;
 - unreasonable intrusion into a persons' private life;
 - discriminatory harassment based on grounds such as race, nationality, creed, religion or sex, which may have the purpose or effect of giving less favorable treatment to an employee or group of employees to any other employee or group of employees in the same circumstances.
- All the conduct cited above would not be considered harassment without a reasonable ground before making a complaint. There is a wide range of ambiguous behavior that might offend some people, but not others. The key to this is whether the recipient asked the alleged harasser to stop it. Managers may make negative decisions about performance or work assignments which do not in themselves constitute harassment.
- Any retaliation or threat of retaliation against any person making a complaint of harassment or involved in the procedure for dealing with a complaint of harassment will be considered as a violation of the code of conduct of the company and appropriate disciplinary action will be initiated.
- Allegations of harassment made by individuals who are not employees will be reviewed by the CHRO/Divisional HR Head, outside the framework of this policy.
- The Informal Approach is aimed at resolving a complaint of harassment through an assisted negotiation process between the person who believes he/she is being subjected to harassment and the alleged harasser, by the provision of advice and support on a strictly confidential basis. Persons who believe they are being subjected to harassment

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and alleged harassers are encouraged to use informal means in order to resolve problems as soon as possible, in a fair and respectful manner.

- The Formal complaints will be dealt with rapidly in the strictest of confidence and where warranted, appropriate disciplinary action will be taken. The person submitting the complaint should address it in writing on a strictly confidential basis to CHRO/Divisional HR Head.
- The Formal complaint should describe the specific offensive act or acts, the time, location and circumstances under which they took place and any other information relevant to the case. The Formal complaint must be signed with date.
- On the basis of the information received, the CHRO/Divisional HR Head may investigate the complaint through Investigation Panel composed of three members and on the basis of investigation report initiate disciplinary proceedings against the respondent, as the case may be.
- Creating a work environment which is free from harassment is every employees' responsibility. Employees should conduct themselves in accordance with the Company Code of Conduct.

Process Owner: HR



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