

Title: Policy for Prevention of Sexual Harassment at the work place
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Policy for Prevention of Sexual Harassment at Workplace (POSH)

1. Objective:

The objective of this policy is to provide a safe and healthy work environment for our employees by establishing guidelines to deter any sexual harassment at work place, define the mechanism for raising concerns, their investigation and action on the findings. This is in compliance of the law.

2. Scope:

- This policy is applicable to all employees of the company across work levels.
- This policy is also applicable to all our associates viz. contract employees, retainers, consultants, voucher payment staff, trainees, temporary employees, part time employees, workmen and third party personnel who visit and / or work in the company premises.
- This policy covers notional extended workplaces as well, which can also include the cyber space.

3. Definition of Sexual Harassment: [Refer point 13]

4. Internal Committee - A Prevention of Sexual Harassment (POSH) Committee is set up to redress all complaints on Sexual Harassment across the organization. All the members of this committee shall be nominated by the Management of the company and will hold office for such period not exceeding three year from the date of appointment.

[Refer Annexure No.1 for the newly nominated POSH Committee January 29, 2025 to January 29, 2028]

5. Reporting the Complaint:

Any individual [complainant] who feels is subjected to sexual harassment by another employee or associate can report the incident in writing to any of the POSH Committee members within a period of three months from the date of the incident or the last of the incident.

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6. Redressal Mechanisms & Action:

Redressal System (Written reporting) is employed where complaint is received in writing.

- Immediately following the complaint the POSH committee will send a written notification for separate meeting dates, first with the Complainant and later with alleged Harasser **within 7 working days** of the receipt of the written complaint.
- The statement of complaint should include the dates, times and places of incident(s), description of the circumstances, and the names of the persons involved.
- A copy of the complaint will be shared with the alleged harasser, who will be allowed sufficient time (three working days) to clarify prior to appearing before the POSH committee.
- The POSH Committee will nominate minimum three persons (one woman, one man and one external member) for the committee to carry out the in depth inquiry under strict confidentiality and submit their report with adequate evidence and details of witnesses **within 3 weeks** of their appointment to the management.
- During the pendency of an inquiry, the parties will be advised to refrain from Communication with each other in all possible ways or necessary action may be recommended by the POSH committee as stated in the law.
- During the pendency of an inquiry, the complainant and the alleged Harasser shall not be transferred or sent on leave without the express consent of the parties involved.
- The Minutes of all meetings and its detailed proceedings will be documented or recorded and signed off by the all members of POSH Committee.
- The POSH Committee shall submit their report with recommendation to the MD.
- Implementation of the final recommendation is the responsibility of HR and the noting of the case will go to the personal files of the parties concerned.
- Information about the closure of the complaint and action taken will be verbal disclosed to the alleged Harasser and the Complainant separately and the POSH Committee.
- This would constitute the closure of the case.

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7. Possible Actions:

The disciplinary action taken may range from Warning to Termination, depending on the intensity of the violation of conduct.

8. Unjustified/ False Complaint or Withdrawal of Complainant:

If the investigations reveal that the complainant had raised the false or malicious concern or evidence with ulterior/ malafide / motives, with intention to defame the alleged Harasser, the Head HR may initiate appropriate disciplinary action against the complainant, while ensuring that others are not deterred from raising concerns in the future.

9. Retaliation and Victimization:

The management shall prevent retaliation, victimization, additional harassment, intimidation, humiliation, character assassination or reprisal in any manner of the complainant or any witnesses.

10. Conciliation:

The Committee before initiating an inquiry, at the request of the complainant should take steps to settle the matter between the complainant and the accused through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation. Where a settlement has been arrived the committee shall record the settlement so arrived and forward the same to the Head HR to take action as specified in the recommendation. The committee shall provide the copies of the settlement as recorded to the complainant and the accused. Where the settlement is arrived no further inquiry shall be conducted by the committee.

11. Guidelines:

- It is expected that every employee, irrespective of their work level, will uphold the dignity of the co-workers and not indulge in any act that can be construed as an act of harassment.
- It is most important, that all parties to this, viz. Complainant, alleged Harasser, all members of POSH Committee, witnesses and other associated members should keep all information strictly confidential and respect the dignity at all times.
- It is expected that the POSH Committee ensures a free, fair and impartial investigation takes place without any prejudice to any of the parties and follow principles of natural justice
- Constitution of POSH Committee (5 / 7 / 9 member team)
 - a. It shall have a Chairperson who is one of the Senior most women in the organization
 - b. It shall have minimum 50% of Women members
 - c. It will include an external member as per stipulated by law
- The company, the POSH Committee members, the witnesses and all others concerned shall keep the complaints, its investigation reports and results of the case **strictly confidential**.
- It is the responsibility of each employee to understand this policy. Any claims of ignorance as an excuse to explain inappropriate behavior will not be accepted.

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- In case of new employees, as part of their induction programme, they should be explained and handed over.
- Employees intending to clarify their understanding of the policy are encouraged to meet their Location HR Head.

12. Roles and Responsibilities:

▪ Employees

- a. Abstain from committing acts amounting to sexual harassment whether explicit or implied resulting in unwelcome behavior or creating hostile environment.
- b. Report incidents of Sexual Harassment without fear or favor.

▪ POSH Committee

- a. Focus on prevention and then redressal.
- b. Spear head the entire process as soon as a complaint arises and complete the entire process within the timelines of the policy
- c. Strictly adhere to the fairness and confidentiality requirement of the policy.
- d. Responsible to maintain the safe custody of the complete records and accurate documentations of each case.

▪ Head HR

- a. Monitor the entire process till closure.
- b. Resolves all queries, clarify the policy understanding
- c. Ensure fairness and confidentiality of the entire proceeding.
- d. Overall process & policy ownership.
- e. Ensure the policy is communicated to all employees.
- f. Periodically review and update the policy, based on the experiences of dealing with complaints and the regulations of the relevant act.
- g. Prepare and Submit the Annual Report to the Management.
- h. Conduct regular sensitization session

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13. Definitions:

Complainant: The person reporting an incident of Sexual Harassment of self or another colleagues(s).

Harasser: The person who is alleged / reported to have committed an act of Sexual Harassment.

Sexual Harassment: Sexual Harassment has many different definitions and is not the intent of this policy to limit the definition, but to give as much guidance as possible concerning what actions constitute and imply sexual harassment.

Sexual Harassment includes such '**unwelcome**' **sexually determined** conduct(whether directly or by implication) as Physical contact and advances, intentional touching, pinching, grabbing, brushing, sexual assault, concerning, trapping, blocking pathway, brushing against body, any physical, verbal or sexually implied / oriented conduct or graphic, unsavory remarks, gestures, sexual jokes, eve teasing, misogynist humor, jokes demeaning women or causing embarrassment , innuendoes and off-color remarks, comments on physical appearances, catcalls, whistles, demanding or requesting sexual favors over promises relating to employment, promotions, increments which is known as 'quid pro quo sexual harassment, Oral, Written or Graphic. Harassment includes showing pornography or visual material such as pinups, cartoons, graffiti, leering or staring at another's body or sexually suggested gesturing. This includes any other unwelcome physical, verbal or non-verbal conduct of Sexual orientation or nature. This list is indicative and not exhaustive.

Annexure No. 1

(Policy for Prevention of Sexual Harassment at Workplace)

**Internal Complaints Redressal Committee
A Prevention of Sexual Harassment (POSH) Committee
For the year January 29, 2025 to January 29, 2028 (3 Years)**

w.e.f. : January 29, 2025

	Corporate
1	Mr. Sanjay Kumar
2	Mr. V K Lele
3	Mr. K K Shetty
4	Ms. Chitra Lade
5	Ms. Kirti Patkar
6	Ms. Sonali Pathare
7	Ms. Nilima Jadhav
	Oil & Lubricants Division
1	Mr. Sanjay Kumar
2	Mr. Pawan Rana
3	Dr. TCSM Gupta
4	Ms. Chitra Lade
5	Ms. Neelambari Kolaskar
6	Ms. Kirti Patkar
	Conductor Division – Silvassa
1	Mr. Sanjay Kumar
2	Mr. S K Jana
3	Mr. Sujendra Roy
4	Ms. Chitra Lade
5	Ms. Kirti Patkar
6	Ms. Sonali Pathare
7	Ms. Snigdha Mishra
8	Ms. Kajal Ahire

	Conductor Division – Jharsuguda/
1	Mr. Sanjay Kumar
2	Mr. Rajesh Rangani
3	Mr. Ashok Prasad
4	Ms. Chitra Lade
5	Ms. Kirti Patkar
6	Ms. Sonali Pathare
7	Ms. Jyoti Pandey
	Cable Division – Umbergaon
1	Mr. Sanjay Kumar
2	Mr. K K Shetty
3	Mr. Srinivas Parvatikar
4	Mr. Jaladhi Oza
5	Ms. Chitra Lade
6	Ms. Neelambari Kolaskar
7	Ms. Kirti Patkar
8	Ms. Sonali Pathare
	Cable Division – Khatalwada
1	Mr. Sanjay Kumar
2	Mr. K K Shetty
3	Mr. AK Samanta
4	Mr. Balvirsinh Parmar
5	Ms. Chitra Lade
6	Ms. Neelambari Kolaskar
7	Ms. Kirti Patkar
8	Ms. Sonali Pathare

Note: There will be an external member on each committee along with internal members.

Process Owner: Head HR

Kushal N Desai
Chairman and Managing Director
January 29, 2025