

SHREE TNB POLYMERS LIMITED

POLICY ON SEXUAL HARASSMENT AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL)

Corporate Identity Number: U25209DN2007PLC000242

Registered Office: 132/1/1/4, Behind Prince Pipes, Athal Road, Athal, Silvassa-396230, DNH

POLICY FOR PREVENTION OF SEXUAL HARASSMENT- SHREE TNB POLYMERS LIMITED

BACKGROUND

Shree TNB Polymers Limited (hereinafter referred to as the “**Company**”) is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the “**Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**” of India and existing rules framed thereunder namely the “**Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013**.”

PURPOSE AND SCOPE

The Purpose of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

This policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, secondees and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

This policy does not prevent any aggrieved person from taking recourse to the law of the land.

WHAT IS HARASSMENT?

“**Harassment**” is any improper conduct by an individual, that is directed at and offensive to another person or persons in the workplace, and that the individual knew or ought reasonably to have known would cause offence or harm. It comprises any objectionable act, comment or display that demeans, belittles, or causes personal humiliation or embarrassment, and any act of intimidation or threat. It includes harassment within the meaning of the “Protection of Human Rights Act, 1993” and applicable international and united nation’s conventions and treaties. Harassment shall also include Sexual harassment as defined below.

WHAT IS SEXUAL HARASSMENT?

“**Sexual Harassment**” shall mean and include any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

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

Sexual harassment also includes any of the following:

1. unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
2. unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
3. eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
4. 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;
5. conduct of such an act at work place or outside in relation to an employee of the Company, or vice versa during the course of employment; and
6. any unwelcome gesture by an employee having sexual overtones.

IF YOU ARE BEING HARASSED:

(a) Tell the accused that his/her behavior is unwelcome and ask him/her to stop.

(b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response).

It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.

(c) File a complaint as soon as possible. If, after asking the accused to stop his/her behavior, the harassment continues, report the abuse to the Internal Complaints Committee ('ICC') formed for this purpose.

DEALING WITH THE COMPLAINT

It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the ICC of any instance or behavior or sexual harassment by a co-worker towards another employee.

The concerned employee shall give his complaint in writing to the Presiding Officer of the Committee giving details of the incident within a week of its occurrence.

Once the complaint is received, it will be kept strictly confidential.

The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.

The Committee shall ensure that a fair and just investigation is undertaken immediately.

Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.

The ICC after receipt of the Complaints, conduct enquires, handle, deal with the complaints, call for written explanation, call upon and examine any/all witnesses mentioned by the complainant and accused, initiate corrective actions, resolve the disputes, lodge complaints with appropriate authorities and to initiate all action and to do all acts and things under the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed there under read with Indian Penal Code, 1860, Code of Criminal Procedure 1973 and all other Acts / Rules / Regulations as may be applicable from time to time.

The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of harassed as claimed the accused will be disciplined accordingly.

The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer.

DISCIPLINARY ACTION

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the Complainant.

ACTION FOR FALSE/MALICIOUS COMPLAINT

If the Internal Complaints Committee arrives at the conclusion that the allegation against the accused is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend the Company to take action against the employee who has made the complaint. Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.

CONFIDENTIALITY

It shall be the duty of all the persons involved in the inquiry process to ensure that all complaints lodged are treated with utmost confidentiality. Any breach of this can invite disciplinary action before, during or after the inquiry.

APPEAL AND OTHER RECOURSE

Any person aggrieved from the recommendations made by the Internal Complaints Committee or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the provisions of the Act.

PROTECTION AGAINST RETALIATION

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon

as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

DOCUMENTATION

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's files with the full report of the Complaints Committee.

AWARENESS

- 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 HR team.
- 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.
- 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.
- Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

CONCLUSION

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

AMENDMENT

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 employee.