

Prevention of Sexual Harassment (POSH) Policy

1.0 Objectives:

- a) To provide protection against sexual harassment of women at workplace
- b) To prevent and deter the commission of acts of sexual harassment of women at work places.
- c) To provide procedure for the resolution, settlement and prosecution of acts of sexual harassment of women at work places.
- d) To strengthen the culture of respect for women colleagues in the organization.

2.0 Applicability:

This policy is applicable to all employees of Privilege Industries Ltd. All contract employees, retainers, trainees are also expected to abide by this policy.

3.0 Definition of Sexual harassment:

“Sexual harassment” would include such unwelcome sexually determined behaviour, whether directly or by implication as:

- (a) Physical contact or advances; or
- (b) Demand or request for sexual favours; or
- (c) Making sexually coloured remarks; or
- (d) Showing any pornography, writing sexually loaded letters/emails/SMSs; or
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

4.0 Circumstances amounting to Sexual Harassment

- (a) implied or explicit promise of preferential treatment in her employment; or
- (b) implied or explicit threat of detrimental treatment in her employment; or
- (c) implied or explicit threat about her present or future employment status; or
- (d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (e) Humiliating treatment likely to affect her health or safety

5.0 Rules:

- a) No employee or persons whom this policy is applicable shall indulge in any act of sexual harassment of any women at the work place;
- b) The concerned Head of the Department shall take all reasonable and appropriate steps to prevent sexual harassment of any women at her work place;
- c) Any employee found guilty of commission of any act of sexual harassment as defined in para 3 above shall be dealt with in accordance with the Disciplinary Rule / Model Standing Order as applicable in his case and punished accordingly. This disciplinary action will be in addition to any action which may be taken against employee / such person in accordance with the Law of the Land.

6.0 Constitution of Internal Complaints Committee

Company will constitute The Internal Complaints Committee to inquire into complaints related to sexual harassment and recommend actions. The composition of the Committee will be as under:

- (a) The Presiding Officer, who shall be a woman employed at a senior level;
- (b) Two members from amongst employees preferably committed to the cause of woman or who have had experience in social work or have legal knowledge;
- (c) One member from amongst non-governmental organisations or associations committed to the cause of women or familiar with the issues relating to sexual harassment;

The Committee shall be constituted by the Head- Human Resources who is nominated by the Management to administer the provisions of The Sexual Harassment of Women at Workplace (P P & R) Act 2013 in the manner as referred to hereinabove. Presiding Officer or the members shall hold office for a period not exceeding three years from the date of their nomination.

All the records and proceedings of the Committee shall be kept and maintained in a very confidential manner.

7.0 Complaint Handling and Redressal / Action

- a) Any women aggrieved of any act of sexual harassment may make a complaint in writing addressed to the Internal Complaint Committee within a period of three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident. If such complaint cannot be made in writing, Presiding officer or members of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.
- b) Internal Complaint Committee at the request of aggrieved woman shall take steps to settle the matter between her and the respondent through conciliation. No monetary settlement shall be made on the basis of conciliation. Copies of the settlement recorded by the Internal Complaint Committee shall be provided to the aggrieved woman and the respondent and matter is considered closed.
- c) If a settlement is not arrived at, as prescribed above, Internal Complaint Committee shall proceed with the inquiry into the complaint as per the Service Rules applicable to the respondent. If the Internal Complaint Committee finds that a prima facie case exists, it shall forward the complaint to the police within seven days for registration of case under section 509 of IPC and any other section as may be applicable. The same process will also be applicable where the settlement arrived at between the aggrieved woman and the respondent has not been complied with by the respondent.
- d) In case where both parties are the employees, they will be given opportunity of being heard and a copy of the finding shall be made available to both the parties, enabling them to make representation against the findings before the Internal Complaint Committee.
- e) During pendency of the inquiry, aggrieved woman may request the Internal Complaint Committee for her transfer or transfer of respondent to other workplace, grant leave to her upto a period of three months or such other relief which she may prescribe. On the recommendation of the Internal Complaint Committee, Company will implement the recommendation and report it to the Internal Complaint Committee.
- f) On completion of the Inquiry, the Internal Complaint Committee shall provide its findings to Head – Human Resources with recommendations for taking action. Head – Human

Resources shall initiate action/s as recommended by the Internal Complaint Committee and submit compliance report to the Internal Complaint Committee within sixty days of receipt of recommendation.

- g) The provisions of The Sexual Harassment of Woman at Workplace (P P & R) Act 2013 shall be applicable and followed in all proceedings and actions taken thereon.

8.0 Preventive Action:

This policy shall be widely published and circulated among the employees at all the work places of the Company in order to create awareness among the employee.

Date: 1st April 2018



CIRCULAR

In terms of the provisions of "The Sexual Harassment of Woman at Workplace (Prevention Prohibition and Redressal) Act 2013, an 'Internal Complaints Committee' is hereby constituted to discharge its responsibilities prescribed under the said Act.

The members of the Internal Complaints Committee are as follows:

- | | |
|--|---------------------|
| 1. Ms. Archana Parekh, Executive Assistant | - Presiding Officer |
| 2. Ms. Roshan Dhumak, Executive Accounts | - Member |
| 3. Mr. Nilesh Kudekar, Executive HR & Admin | - Member |
| 4. Mr. Deepak Bang, Assistant General Manager Accounts | - Member |
| 5. Ms. Eva Affonso, Advisor | - Special Member |

This is circulated for general information of all employees of Privilege Industries Limited. Any Complaint related to sexual harassment at workplace may be lodged with committee in writing and the committee will enquire into contents of the complaint and take action as prescribed in the said Act.

A handwritten signature in blue ink, appearing to be 'Archana Parekh', written over a horizontal line.

(HR Department)