



POLICY FOR PREVENTION OF SEXUAL HARASSMENT

NAGA LIMITED

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INTRODUCTION

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

The ‘Policy on Prevention of Sexual Harassment of women at workplace: Guidelines for Naga Limited intends 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.

I. Our Company is committed to:

- provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment.
- promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.
- take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

II. Coverage:

This policy applies to all categories of employees of the Company, at units: Dindigul, Bangalore, Chennai.

III. Frequency:

The Management reserves the right to review and revise the Policy at its sole discretion, as and when the circumstances warrant.

IV. Definition of Sexual Harassment:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical),
2. Demand or request for sexual favours,
3. Any other type of sexually-oriented conduct,
4. Verbal abuse or 'joking' that is sex-oriented,
5. Showing pornography,
6. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

The words "**any other unwelcome physical, verbal, or non-verbal conduct of sexual nature**" mentioned above, may include but not limited to the following:

- Demand for sexual favours accompanied by implied or over threats concerning one's job, grade or letter or recommendation.
- Subtle pressure for sexual activity.
- Sexual comments and innuendos.
- Visual display of degrading sexual images.
- Physical assault, rape and sodomy.

V. Responsibilities regarding sexual harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

VI. Administrative Guidelines:

(a) Complaint mechanism :

For time-bound redressal of the complaint made by the victim, a Sexual Harassment Complaints Committee has been created in the Company whether or not such conduct constitutes an offense under law or a breach of the Service Rules.

(b) Constitution of the Sexual Harassment Complaints Committee:

Initially, and till further notice, the Committee will comprise of the following four members out of which at least 2 members will be women:

- a) A presiding Officer who shall be a Senior Woman Employee. Head of Personnel and Human Resources.
- b) Another senior employee, men or woman, who is interested in women welfare.
- c) A Woman member from a non-governmental organisation or association committed to cause of woman or who have had experience in social work or have legal knowledge.
- d) It will always be ensured that one half of total Members so nominated shall be women.

The Complaints Committee is responsible for:

- a) Investigating every formal written complaint of sexual harassment.
- b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- c) Discouraging and preventing employment-related sexual harassment.

(c) Procedure:

- i. Within 90 days of the incident, the complainant (who may or may not be the victim) may lodge an informal complaint with his / her Head of the Department or HR Person or directly with the Sexual Harassment Complaints Committee or a formal complaint with his / her Reporting Manager or concerned HR person.
- ii. In case of formal complaint, the Head of the Department or HR person will refer it to the Sexual Harassment Complaints Committee.
- iii. The Committee may decide to conduct an informal or formal procedure for resolving the issue.
- iv. In both the above cases, the Committee will conduct preliminary investigation and prepare an investigation report.
- v. In case the informal procedure is adopted, then depending upon the preliminary findings, the Committee will refer the issue to the Unit Head for resolution.
- vi. The Unit Head will resolve the issue, either by personally mediating or appointing any person to do so.
- vii. If informal resolution fails, the issue is referred back to the Committee for formal resolution within 15 days of failure.
- viii. If the complainant does not substantiate the allegations made, then the proceedings will close and the complainant's appeal will be referred to the Unit Head and the Unit Head's decision will stand as final.
- ix. If the complainant substantiates the allegations made, then the Committee will call for a formal hearing.
- x. At the end of the hearing, the Committee will give its conclusion and findings.
- xi. If it is concluded that the Guidelines have not been violated, then the proceedings will close and the concerned parties will be intimated.
- xii. If it is concluded that the Guidelines have been violated, then the Head of HR will commence disciplinary action, in accordance with the Service Rules and punishment will be imposed based on the severity of the harassment and past

records of the respondent. The concerned parties shall also be counseled.

The disciplinary action / punishment may include, but will not be limited to anyone or combination of the following:

➤ verbal admonition, written warning placed in the respondent's personal file, probation, suspension with or without pay, demotion, removal from administrative duties within a Department, expulsion and dismissal or termination.

At the end of the entire process, registration of the same shall be done in the Company records.

VII. Responsibility:

HR Department is responsible for giving wide publicity and display of the Guidelines prominently in workplace and verify the effectiveness of the Guidelines. They are also responsible to suggest revisions wherever required, based on the ground realities and past experience.

VIII. 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.

IX. 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.

X. 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.

XI. 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.