

## Department of Human Resources & Training

<b>Subject : Prevention of Sexual Harassment at Workplace</b>			
Prepared by: HR	Approved by: CHRO	Effective Date: 01/04/2011 Date of Revision: 01/04/2015, 01/06/2018, 01/08/2023	<b>Policy No: 26</b> Version: 4

**Objective:** Synthite is an equal opportunity employer and is committed to creating a healthy environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

### **Guidelines:**

1. It is the policy of **Synthite** that every person has the right to be treated with dignity and respect and to be free from all forms of harassment in the workplace. All forms of harassment are contrary to the high standards of conduct required of all employees and may lead to disciplinary action. Employees shall observe common courtesy and considerate behaviour towards each other regardless of rank or contractual status.
2. 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. Accordingly, while the policy covers all key aspects of the Act, for any further clarification reference shall always be made to the provisions of the Act.
3. All employees are expected to take responsibility for their own actions and to conduct themselves in accordance with this policy. Managers are responsible for providing and maintaining a harassment-free work environment. They should make every effort to prevent harassment from occurring, as well as to take effective and prompt protective measures once they become aware of the harassment to ensure that behaviours of this type ceases immediately.
4. The policy shall be applicable to all employees of Synthite Industries Private Ltd employed at all its manufacturing units and offices, who are either regular, temporary, ad-hoc, engaged directly or through an agent / contractor including persons working on voluntary basis and also apprentices, trainees, probationers including consultants of the Company. This policy is deemed to be incorporated in the employment contracts of all the employees.
5. Sexual harassment at the workplace or in connection with work constitutes unacceptable behaviour that will not be tolerated. The Company Management places the highest priority on the prevention and elimination of sexual harassment in the workplace, bearing in mind that sexual harassment may be detrimental to an individual's physical & psychological well-being, morale and can create a hostile work environment. The Company Management wishes to emphasize that all complaints of sexual harassment will be investigated seriously and that disciplinary actions will be applied, as appropriate. Any proven false and malicious or vexatious accusations of sexual harassment will be deemed to constitute a violation of the above standards of conduct and disciplinary actions will be applied, as appropriate.
6. **DEFINITION: SEXUAL HARASSMENT** includes such unwelcome sexually determined behaviour (whether directly or by implication) which creates an intimidating, hostile or humiliating work environment for that person such as:
  - a) Physical contact and advances;
  - b) A demand or request for sexual favours;

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- c) Sexually coloured remarks;
- d) Showing pornography;
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

### **The following actions can also constitute sexual harassment**

- Eve-teasing,
- Unsavoury remarks,
- Jokes causing or likely to cause awkwardness or embarrassment,
- Innuendos and taunts,
- Gender based insults or sexist remarks,
- Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like,
- Touching or brushing against any part of the body and the like,
- Displaying pornographic or other offensive or derogatory pictures, cartoons, pamphlets or sayings,
- Forcible physical touch or molestation and
- Physical confinement against one's will and any other act likely to violate one's privacy.

7. It is essential to emphasize that sexual harassment refers to conduct which is unwanted and unwelcome to the recipient. As this is the key factor that distinguishes it from friendly, flirtatious or other relations that are freely and mutually entered into, it is important that a person who believes that she or he is the victim of sexual harassment clearly communicates this (either directly, through co-worker or through third party) to the employee engaging in the unwanted and unwelcome behaviour.

### **8. INTERNAL COMMITTEE (IC)**

An Internal Committee (IC) shall be constituted at every Unit as per the requirements provided under '**The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013**', comprising of members from within the Unit to develop guidelines, to prevent sexual harassment and to promote a fair and ethical workplace.

The Internal Committee shall consist of:

- A Presiding Officer who shall be a senior level woman employee from the Unit / Office
- One member from among the Non-Governmental Organization (NGO) or association committed to the cause of women or a person familiar with the issues relating to sexual harassment
- At least one half of the total members nominated shall be women
- One or more members from among the employees of the Unit;

### **The Internal Committee (IC) constituted for the Unit is at Annexure – I.**

The Internal Committee shall meet periodically to handle complaints of sexual harassment, discuss measures to promote awareness and to assess training requirements within the organization. The role and responsibility of the Committee shall be as below:

- Prevent discrimination and sexual harassment against women, by promoting gender amity among employees;
- To lay down procedures for the prohibition, resolution, settlement and prosecution of acts of discrimination and sexual harassment against women;
- Deal with cases of discrimination and sexual harassment against women, in a time bound manner, aiming at ensuring support services to the victim and termination of the perpetrator;

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- Recommend appropriate punitive action to the Company Management based on the findings in the enquiry.

### 9. **PROCEDURE FOR FILING A COMPLAINT**

The Committee deals with issues relating to sexual harassment at **Syn<sup>n</sup>thite**. It is applicable to all employees. An aggrieved woman who wants to complain against an act of Sexual Harassment shall inform the Internal Committee in writing within a period of three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of the last incident. Where the aggrieved woman is unable to make a complaint on account of her physical or mental capacity, the legal heir or such person as may be prescribed by the IC may make a complaint.

Where a complaint cannot be made in writing, any member or the Chairperson of the IC, as the case may be shall render all reasonable assistance to the aggrieved woman for making the complaint in writing. The complaint shall contain all the material and relevant details concerning the alleged sexual harassment including the names of the persons involved and the complaint shall be addressed to the Committee. A complaint of Sexual Harassment made by an aggrieved woman to the Head of the Department (HOD) or her line manager can be forwarded by the HOD or the line manager as the case may be. IC shall treat such complaint in the same manner as made by the aggrieved woman.

No meaningful investigation of complaints of sexual harassment can be done in the absence of concrete evidence, specific details and testimony by witnesses. Hence, only in cases of grievances of general nature impacting women employees, an investigation can be undertaken by IC without a written complaint or without asking for the identity of the complainant.

An HOD, Manager or HR Team Member shall not investigate into a complaint of sexual harassment, except through the involvement of the Internal Committee constituted for the purpose.

The Internal Committee shall initiate enquiry proceedings within a period of 7 working days of receipt of the complaint by sending a copy of the complaint to the respondent. The committee will complete enquiry within a period of 3 months from the date of receipt of the complaint. The Committee after examination of all details will submit its recommendations to the Unit Head recommending the penalty to be imposed.

The Unit Head, upon receipt of the report from the Committee, after giving an opportunity to the accused of being heard, confirm the penalty recommended with or without modification after duly following the prescribed procedure. The company management shall ensure that the victims or witnesses of are not victimized or discriminated against while dealing with complaints of sexual harassment.

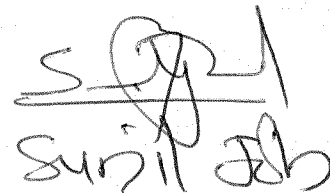
Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, the Committee may recommend action against the woman or the person making the complaint as per the relevant rules of the Company. In such cases, malicious intent must be clearly established through a separate enquiry.

An employee who is found guilty in the proceedings by the IC or an employee who resigned from employment subsequent to allegations of sexual harassment and separated from employment, either by way of resignation or termination from Syn<sup>n</sup>thite shall not be re-employed in Syn<sup>n</sup>thite or any of the group companies.

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10. **DISCIPLINARY ACTION:** Appropriate disciplinary action in accordance with the Standing Orders or other relevant rules will be taken.
11. If the individual is not satisfied with the measures proposed by Committee or no proposal is notified to the individual within a period of 3 months from the date of the complaint, the individual can submit her grievance to the Managing Director of the company.
12. **CRIMINAL PROCEEDINGS:** Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
13. **CONFIDENTIALITY:** The Company understands that it is difficult for an aggrieved woman to come forward with a complaint of sexual harassment and recognizes her interest in keeping the matter confidential. To protect the interest of the woman employee, the accused person and others involved, confidentiality will be maintained throughout the investigation process and to the best extent practicable. The complaint, evidence obtained during the course of the investigation, recommendations of the committee and action taken by the employer shall be considered confidential materials and will not be published or made known to public or media.  
  
Any person who has knowledge of this matter, contravening the confidentiality obligation will be subject to disciplinary action as prescribed in the Act. The confidentiality obligation will be made known to the parties by the IC during the enquiry process.
14. All complaints and actions taken by the committee shall be recorded. The Committee shall analyze and put up a report on all complaints of this nature at the end of the year for submission to the Head of HR.
15. The Committee shall make an annual report to the Government department concerned of the complaints and action taken by them during the year.
16. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Synthite shall take all steps necessary and reasonable to assist the affected person in terms of support to initiate legal action as per any law in force.
17. In the event of any dispute, conflict or ambiguity that arises between this policy and the said Act or any other applicable law on such issue, this policy shall be suitably amended to ensure that the provisions provided under the Act are adequately captured.
18. In case the Committee finds that offence is of grave nature coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.
19. All units are advised to widely communicate the policy among their team members, ensure compliance and re-constitute the Internal Committee where required. The amended provisions of this policy shall come into effect from 1<sup>st</sup> August 2023.

End of Policy



Surjit Singh