

MANUGRAPH GROUP

POLICY ON SEXUAL HARASSMENT AT WORKPLACE

POLICY STATEMENT

Over the years, our Company has build a reputation for responsible behavior and fairness. The Group is committed in creating and maintaining a community in which employees can work together in an environment free of violence, harassment, exploitation and intimidation.

The Company believes that all employees of the Company have the right to be treated with dignity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

OBJECTIVE

- i. To comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- ii. To lay down a standard policy governing Sexual Harassment at Workplace
- iii. To evolve a permanent mechanism for the prevention and redressal of sexual harassment cases and other acts of gender based violence
- iv. To define and explain various procedures to be followed in event of untoward incident of sexual harassment reported by any employee
- v. To lay down guidelines for the forum for redressal of such grievances, as per the legal framework

SCOPE:

This policy applies to all categories of employees of the Company, including permanent, management and workmen, temporaries, trainees and employees on contract at its workplace, site offices, or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. Corporate office, Manufacturing Units or other premises where the Company's business is conducted;
2. Any other site away from the Company's premises where company-related activities are performed;

3. Any place visited by an employee arising out of or during the course of employment.
4. Any social, business or other functions/gatherings where the conduct or comments may have an adverse impact on the workplace.

SEXUAL HARASSMENT:

“Sexual Harassment” to include but not restricted to the following:

- i. Unwelcome sexual advances, verbal or physical conduct of sexual nature, whether implicitly or explicitly;
- ii. Unwelcome sexual advances involving verbal, non-verbal and/or physical conduct such as sexually colored remarks, jokes, letters, phone calls or e-mails, gestures, exhibition of pornography, lurid stares, physical contact or molestation, stalking, sounds or display of pictures, signs, verbal or non verbal communications, which offends the individual’s sensibilities and affect his/her performances;
- iii. Eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy
- iv. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

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.

INTERNAL COMPLAINTS COMMITTEE:

The Company shall have an Internal Complaints Committee at all locations, to specifically address any complaints of sexual harassment. The Committee will be constituted by the Company and would be headed by a Presiding Officer, who shall be a Woman Associate employed at a senior level at workplace from amongst the Associates. In case the senior level officer is not available, Presiding Officer shall nominate the senior level officer from other locations.

The Internal Complaints Committee shall comprise of the following members:

- (a) Not less than two member shall amongst Associates preferably committed to the cause of women or who have had experience in social work or have a legal knowledge; and
- (b) One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

Provided that, at least one-half of the total members so nominated shall be women

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least two other members, one of whom shall be a lady.

The Internal 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.

PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment in order to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

1. When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.
2. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Internal Complaints Committee for redressal of her grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson or any member of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 10 days from the date of occurrence of the alleged incident, sent in a

sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose her name, department, division and location she is working in, to enable the Chairperson to contact her and take the matter forward.

2. Upon receipt of such Complaint, the Committee will hold a meeting with the Complainant within 15 (fifteen) working days of the receipt of complaint.
3. In the meeting, the members shall hear the complainant and record his/her allegations. The Complainant may also submit any corroborative material with a documentary proof, if any.
4. In case the Complainant does not wish to depose personally to avoid embarrassment, the Complainant can meet one of the Committee member personally and record his/her statement.
5. The Committee shall call upon the harasser / person against whom a complaint is being made, for deposition / explanation for the behavior.
6. In the event, the Committee members opine that the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, they will record the findings with reasons and communicate the same to the complainant.
7. If the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, the Committee will proceed to investigate the allegation.
8. The Committee will provide a statement of allegation to the Harasser / person against whom a complaint is being filed and give him / her any opportunity to submit a written application within 7 working days from receipt of such statement. A copy of such statement would also be provided to the Complainant.
9. The parties, if so desires, can request the Committee to call upon any witness(es) as they may consider necessary. Upon receipt of such request, the Committee may call upon the witnesses for hearing.

10. The Committee shall complete the enquiry within reasonable period but not later than 3 months and shall submit a written report containing the findings and recommendations to the Director(s) and Head - HR.

DISCIPLINARY ACTION:

In the findings / report of the Internal Complaints Committee confirms that the employee is found guilty of sexual harassment, the Company, within 10 working days, upon recommending of the Committee, can initiate following actions against such employee:

- i. Formal apology
- ii. Counselling
- iii. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- iv. Change of work assignment / transfer either the perpetrator or the victim.
- v. Suspension or termination of services of the employee found guilty of the offence.
- vi. The Complaint's Committee report will also be made available to concerned parties.
- vii. Criminal proceedings, if warranted.

The victim of sexual harassment shall also seek legal remedies as may be provided under statutory laws for the time being in force.

In case the Committee find the degree of offence 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

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.

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.

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.

PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE:

Where the Internal Complaints Committee arrives at a conclusion that the allegation against an employee 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 to the employer to take action against the woman or the person who has made the complaint in accordance with the provisions of the service rules applicable to her or him.

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.