

## **Policy on Prevention of Sexual Harassment at Workplace**

**FOSECO INDIA LIMITED** (the “**Company**”) hereby formulates an Anti Sexual Harassment Policy in line with the requirements of The Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013.

### **1. Purpose:**

To provide a safe and conducive work environment that ensures every employee is treated with dignity and respect. Towards this it is essential that every employee deals with their colleagues and third parties with full fairness and respect which will be attributed to the Company and can affect its reputation.

To promoting work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

### **2. Scope:**

This policy applies to all categories of employees of the Company i.e, permanent, temporary; trainees and contractuels at the workplace or at client's sites.

Where sexual harassment occurs to a Foseco employee as a result of an act by a third party or outsider while on official duty, Foseco will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

### **3. 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 includes such unwelcome sexually determined behaviour (whether directly or by implication) as:

Sexual Harassment at the workplace includes –

- a) unwelcome sexual advances (verbal, written or physical),
- b) demand or request for sexual favours whether by words, gestures or actions,
- c) any other type of sexually-oriented conduct,
- d) showing pornography,
- e) verbal abuse or 'joking' that is sex-oriented.

In addition, the following may also amount to sexual harassment –

- a) implied or explicit promise of preferential treatment in employment,
- b) implied or explicit threat of detrimental treatment in employment,
- c) implied or explicit threat of about present or future employment status,

- d) interference with work or creating an intimidating or offensive or hostile environment,
- e) humiliating treatment likely to affect health or safety.

#### 4. Responsibilities Regarding Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is in accordance with this policy. They are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

#### 5. Complaint Mechanism:

An **Internal Complaints Committee** (hereinafter referred to as **ICC**) has been constituted to address all complaints of sexual harassment and for ensuring time bound redressal of such complaints.

The **ICC** consists of the following members –

S Chandrakala – Presiding Officer  
Ujjal Bhattacharjee – Member  
Assunta Christy – Member  
Madhavi Kuthe – Member

The **ICC** shall be responsible for –

- investigating every complaint of sexual harassment
- submitting its findings and recommendations to the Managing Director which will then be forwarded to the Board of Directors

#### 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 behaviour of sexual harassment by a co-worker towards another employee.
- The concerned employee shall give his/her complaint in writing to the Presiding Officer of the **ICC** 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 **ICC** shall ensure that a fair and just investigation is undertaken immediately.
- Both the complainant and the alleged accused will be questioned separately to ascertain the genuineness of the complaint. If required, the witness, if there is any, will also be questioned for satisfactory resolution of the matter.

- The investigation shall be completed within 1 month of the receipt of the complaint. The complainant and the accused shall be informed of the outcome of the investigation. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.

## **Documentation:**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the **ICC** on behalf of the Company except where disclosure is required under disciplinary or other remedial/judicial processes.

## **Disciplinary Action:**

Where any misconduct is found by the **ICC**, The matter will be reported to the Board who will decide upon undertaking any disciplinary action against the accused including the nature of action. 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, which will be decided by the Board of Directors.

## **6. Confidentiality:**

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognises 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 the investigation process to the extent practicable and appropriate under the circumstances.

## **7. Protection to Complainant / Victim:**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subjected to any form of reprisal. The Company will ensure that the victim or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment.

## **8. Dissemination of the Policy:**

A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy. It will be the duty of the HR Function to keep / preserve the copy of acknowledgement in the file of the respective employees.

**Dated: 31 October 2019**