
Zenith Birla (India) Limited Policy on Prevention of Sexual Harassment (Posh) of Women at Workplace

I. BACKGROUND:

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 is an act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

As per “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, an “Internal Complaints Committee” needs to be constituted along with laid down guidelines for redressal of complaint related to sexual harassment of Women at workplace.

II. COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

III. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace 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. All Plant or other premises where the Company’s business is conducted.
2. All company-related activities performed at any other site away from the Company’s premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

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. Showing pornography;
5. Verbal abuse or 'joking' that is sex-oriented;

The following circumstances, among other circumstances, if it occurs is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:-

- (i) implied or explicit promise of preferential treatment in her employment;
- (ii) implied or explicit threat of detrimental treatment in her employment;
- (iii) implied or explicit threat about her present or future employment status;
- (iv) interference with her work or creating an intimidating and offensive or hostile work environment for her;
- (v) humiliating treatment likely to affect her health or safety

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. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

VII. COMPLAINTS REDRESSAL COMMITTEE:

The Company has instituted a Complaints Redressal Committee ("Committee") for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Committee consist of Four members including the Presiding Officer, whose names and contact details are mentioned in **Schedule-I** (which may be subject to changes from time to time and such changes will be notified accordingly to Employees). One half of its members are female. The Complaints Committee is responsible for:

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

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

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

A. Informal Resolution Options

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

B. Complaints:

1. An 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 Presiding Officer of the Complaints Redressal Committee constituted by the Management. The Complainant may send a written complaint in a sealed envelope either to any member of the Committee or may also forward the complaint through email at: share@zenithsteelpipes.com in the format mentioned in **Schedule II** preferably within 15 days from the date of occurrence of the alleged incident. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
2. The Presiding Officer of the Complaints Redress Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & Head-P&A as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & Head-P&A will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
 - b. Counseling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - e. Suspension or termination of services of the employee found guilty of the offence
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

IX. 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 the investigatory process to the extent practicable and appropriate under the circumstances.

X. 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.

XI. 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 the 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.

XII. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

For Zenith Birla (India) Limited

Ram Shay Jagetiya
Whole time Director

SCHEDULE I**LIST OF COMMITTEE MEMBERS**

1. Presiding Officer- Mrs. Kanchan Naik
Email: zenith@zenithsteelpipes.com
Ph No.: 022 66168476
2. Members - Mr. Suneel Sullere
Email:- share@zenithsteelpipes.com
Ph No.: 022-66168507
Ms. Rekha Menon
Ph No.: 022-66168400
3. Member from an NGO or Lawyer – Adv. Mr. Dinesh Dubey

For Zenith Birla (India) Limited

**Ram Shay Jagetiya
Whole time Director**

SCHEDULE – II**FORMAT OF THE COMPLAINT**

1. Name of the Complainant :
2. Designation of Complainant :
3. Consultant's Name (If Complainant is outsider at Zenith Birla (India) Limited workplace) :
 - 3.1. Assigned work :
 - 3.2. Consultant's Name, Address & Contact details :
4. Name & Designation of Respondent (if Respondent is employee) :
5. Name, address and Contact details of respondent (if Respondent is not an employee & if contact details are available):
6. Brief facts of incidents occurred including Date, Time & Places of all occurrences:
7. Why Complainant feels that incident happened is a Sexual Harassment :
8. Names of witnesses if any who have witnessed the incidences :

Signature of Complainant Member

Signature of a Committee Member

Date: _____

Place: _____