

PREVENTION OF SEXUAL HARASSMENT POLICY

To reinforce our position as an equal opportunity employer and in the light of the increasing gender diversity in the Zenith Birla (India) Limited and its subsidiary, it has been felt necessary to articulate our commitment to provide a workplace free of sexual harassment.

This also complies with the new Act, The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and Supreme Court directive to employers to have such a policy supported by appropriate grievance Redressal mechanism.

Enclosed, please find the Zenith Birla (India) Limited and its subsidiary policy statement on prevention of sexual harassment at the workplace. This document also details the mechanism to address any complaints that may be received in this context.

Policy to Prevent Sexual Harassment at the Workplace

1. Preamble:

Zenith Birla (India) Limited and its subsidiary are committed to providing a work environment that is professional and mature, free from animosity and one that reinforces our value of integrity that includes respect for the individual.

2. Our Policy:

- Zenith Birla (India) Limited and its subsidiary is an equal opportunity employer.
- All employees are expected to create and maintain a work environment that is respectful of all persons in it.
- Zenith Birla (India) Limited and its subsidiary are committed to providing a workplace that is free of sexual harassment and where all employees are treated with dignity.
- Any employee can complain about sexual harassment as per the guidelines laid down in this policy. All complaints will be treated fairly, seriously, with speed and empathy and in confidence

3. Objective: The Objective of this policy is:

- To define Sexual Harassment
- To provide for an effective complaint Redressal mechanism if there is an occurrence of sexual harassment

4. Coverage: This policy is applicable to all employees, irrespective of their level, across all offices of the Zenith Birla (India) Limited and its subsidiary

5. Definitions:

i. "Employee" - For the purpose of this policy, the term "employee" means any person on the rolls of any of the Zenith Birla (India) Limited and its subsidiary; and this would also include persons who are temporary or part time or honorary employees, by whatever name called and would include persons engaged on a casual basis or for project based assignments and/or persons who are engaged through any third-party service providers. This broad definition of 'Employee' used for the purpose of this policy cannot be used to claim rights of an employee conferred by any policy cannot be used to claim rights of an employee conferred by any other law of the land. ii. "Sexual Harassment" –

The definition of "Sexual Harassment" shall include but not be restricted to the following. Sexual Harassment is such unwelcome sexually motivated behavior (whether directly or by implication) as:

- Physical contact and advances
- A demand or request for sexual favors
- Sexually coloured remarks
- Showing pornography, writing sexually loaded letters/emails/SMSs/MMS, etc
- And/or any other unwelcome physical, verbal or non-verbal conduct of sexual nature

1. Where the victim has reasonable grounds to believe that his/her objection to such unwelcome behaviour would disadvantage him/her in connection with his/her work including recruitment/ employment or allotment of work, promotion or evaluation of his/her engagement in any Company activity.

2. Where any such act(s) create an intimidating/hostile/offensive work environment and/or affect the person's work performance.

3. Where any other adverse or hostile consequences might occur if the victim does not consent to the conduct in question or raise any objection thereto. iii. "Complaints Committee":

A Committee formed under this policy to investigate complaints of sexual harassment referred to it and make appropriate recommendations to the relevant management team.

Complaints Committee: This is a forum of at least 2 persons that will investigate complaints of alleged sexual harassment and make recommendations to the Board of Directors / Management. Complaints Committee will be formed. This committee will receive and investigate into the complaints of sexual harassment and will submit its' recommendations to the Management Team Constitution of the sexual harassment complaints committee: A woman shall head the Complaints Committee and at least half of its members shall consist of women. Further, to prevent the possibility of any undue pressure or influence from any quarter, such Complaints Committee may want to involve a third party, any external member who is well respected in the community and is knowledgeable on the subject of sexual harassment.

6. Complaint Mechanism: Any employee may lodge a complaint of sexual harassment against any other employee to the chairperson or to any member of the complaints committee with intimation to the HR Department. All complaints will have to be sent in writing and will be dealt with in strict confidence by the committee members. The complaints should be sent at the earliest, but preferably within 30 days from the date of occurrence of the alleged incident. The Chairperson of the committee shall, within 7 working days of the receipt of such a complaint, personally meet or designate a member of the complaints committee to meet the employee who has made the complaint and record the statements made at such meeting. During this meeting the employee is also expected to present any corroborative material/evidence to substantiate the complaint. After the meeting with the complainant, and on satisfaction of the existence of a prima facie case of Sexual Harassment, the chairperson shall call for a committee meeting within the next 7 working days. During this meeting of the complaints committee, the person accused of the harassment will be called. The complaints committee will communicate the complaint to the person accused where he/she will be given an opportunity to give his/her views of the situation. After having heard both the parties, the complaints committee shall thoroughly investigate (meet the complainant, enquire into evidence provided, meet the witnesses, consult with experts etc.) the complaint and make a report of its findings within the next two weeks. This report will be submitted to the relevant Management Team. In case the complaint of sexual harassment is proven to be true, the accused person will be subject to strict disciplinary action, up to and including termination of employment. In case the complaint registered is found to be frivolous or false or was made with a mischievous intention, the complainant will be liable to face strict disciplinary action up to and including termination of employment. Any employee who is a part of the investigations shall not be victimised or subject to any unfavourable treatment. The victims of sexual harassment will have the option to seek his/her own transfer.

Nothing in these guidelines should be taken in any way as a limitation on the powers of the Management to decide what disciplinary action(s) is appropriate under given circumstances. Appeal procedure: If the victim of sexual harassment feels unsatisfied with the outcome of his/her complaint to the Complaints Committee as the case may be, he/she may appeal to the Management. The Management after hearing the appeal shall review the case and present their recommendations to the Board of Directors for their action. Criminal Proceedings: Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, Zenith Birla (India) Limited and its subsidiary shall support the victim in initiating appropriate action in accordance with law.

7. Employee Education:

- All employees will be made aware of this policy by circulating this policy and ensuring that they have read the same by getting their signoff.
- A copy of this policy will be given to all new employees on joining.

8. Implementation: This policy will be implemented across the group with immediate effect.

MY COMMITMENT

I, MR./MS. _____, AS A EMPLOYEE OF THE ZENITH BIRLA(INDIA) LIMITED AND ITS SUBSIDIARY, HAVE READ AND UNDERSTOOD THE GROUP'S POLICY TO ADDRESS SEXUAL HARASSMENT. I HEREBY COMMIT TO ABIDE BY THIS DOCUMENT IN LETTER AND SPIRIT, A COPY OF WHICH HAS BEEN MADE AVAILABLE TO ME.

(NAME & SIGNATURE)

DATE:

PLACE: MUMBAI