

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. COMMITMENT:

Xpro India Limited ("the Company") is committed to provide a suitable work environment for every woman employee and shall ensure that every woman is treated with dignity and respect.

The Management and Organisation at the Company is also committed to promote a working environment that is conducive to the professional growth of its women employees and shall ensure equality in opportunity based on merits.

2. SCOPE:

This policy shall apply to all categories of employees of the organisation including permanent employees, managerial staff and workmen, trainees, employees on contract etc.

3. DEFINITIONS OF SEXUAL HARASSMENT:

Sexual Harassment includes any one or more of the followings acts/behaviour (whether directly or by implication) namely-

- Physical contact and advances, or
- Demand or request for sexual favours, or
- Making sexually coloured remarks, or
- Showing pornography, or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

In the event of any doubt or in relation to any issue not covered above, these shall be dealt with in accordance with "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013".

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

Employer's Responsibilities:

- 1.To provide a safe working environment at the workplace for woman;
- 2.Treat sexual harassment as misconduct;
- 3.Display at the conspicuous place in the workplace the penal consequence of the sexual harassment;
- 4.Organise workshop and awareness programmes at regular intervals;
- 5.Provide necessary assistance to the Complaints Committee for dealing with the complaints and conduct an enquiry;

Employee's Responsibilities

- 1.All employees of organisation should ensure that their behaviour is not contrary to this policy;
- 2.All employees should maintain a work environment free from sexual harassment;

5. COMPLAINT MECHANISM:

Whether or not such conduct constitute an offence under any law, an appropriate Complaint Mechanism in the form of "Complaints Committee" (consisting of Sr. Executives & female employees) has been created for speedy redressal of the complaint(s) made by the victim.

6. CONSTITUTION OF COMPLAINTS COMMITTEE(S):

The Company has constituted Internal Complaints Committees at various locations to redress complaints on sexual harassment. Each committee will comprise of:

- 1.A senior lady employee as the presiding officer.
- 2.The other 3 members will be one female member, one male member and an NGO representative familiar with the issue of sexual harassment.

The composition of each committee is attached as Annexure A to this policy.

7. PROCEDURE FOR SETTLEMENT

The organisation is committed to provide a supportive environment for resolving the complaints relating to sexual harassment as under:

A. Informal resolution options:

- 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;
- If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the immediate Superior/Sectional Head/ HOD for redressal of her grievances;

B. Complaints:

- Any employee who is a victim of sexual harassment may make a formal complaint to the Complaints Committee constituted by the Management. The complaint may be in writing and may be in the form of a letter, preferably within 10 days from the occurrence of the alleged incident. The complaint may be filed directly or may be sent in a sealed envelope. The employee/complainant may also submit the complaint through e-mail to the specified e-mail id;
- The Chairperson of the committee shall proceed to determine whether the allegations made in the complaint fall under the purview of sexual harassment or not, preferably within 15 days from the receipt of such complaint. The Chairperson may take opinion of the Complaint Committee as well. In the event of the allegation not falling within the purview of sexual harassment, the Chairperson will record his/her findings with reasons and communicate the same to the complainant;
- If the Chairperson determines that the allegations constitute an act of sexual harassment, he/she will proceed to investigate the allegations with the assistance of the Complaints Committee;
- Where such conduct on the part of the accused amounts to a specific offence under the law, appropriate actions will be initiated in accordance with the law and as may be approved by the appropriate authority;
- The committee shall conduct such investigation in a timely manner and shall submit a written report to the Managing Director in consultation with the Chairman containing the findings and recommendations. The Managing Director will decide/ensure corrective measures/actions on the recommendations of the Complaints Committee and keep the complainant informed of the same;
- The Managing Director shall periodically report to the Board details of investigations, corrective measures/actions, if any, and steps taken to avoid any recurrence.

C. Corrective measures/actions may depend upon the gravity of the case and may include any of the followings:

Firstly,

- ✓ Formal Apology and
- ✓ Counselling

Secondly,

- ✓ Written Warning to the accused and a copy of it to be maintained in the employee's personal file for reference.

Thirdly,

- ✓ Change of work assignment/transfer for either of the accused or of the Victim, whichever is feasible.

Fourthly,

- ✓ Suspension or termination of service of the employee/s found guilty of the offence.

In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

8. 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.

In order to protect the interest of the victim, confidentiality shall be maintained throughout the investigation process to the extent practicable and appropriate under the circumstances.

9. PROTECTION TO COMPLAINANT/VICTIM

The Company is committed to ensuring that no victim/witness is subject to any form of reprisal. Anyone who abuses the procedure will be subject to appropriate disciplinary action.

10. CONCLUSION

In conclusion organisation reiterates its commitment to provide its women employees, a work place free from harassment and shall ensure that women employees are treated with dignity and respect.

Annexure: A

Barjora and Kolkata Office:

- Ms. Rita Abhilashi, Member (New Delhi Office)
- Ms. Pushpanjali, Member (Kolkata Office)
- Mr. Bibhu Ranjan Saha, (Barjora Unit)
- Ms. Pragya Misra Mehrishi (External representative)

Specified e-mail id: rita@birlas.com

Ranjangaon Unit:

- Ms. Sunita Ghatnekar, Member (Ranjangaon Unit)
- Ms. Rita Abhilashi, Member (New Delhi Office)
- Mr. Satish Agarwal, Member (Ranjangaon Unit)
- Ms. Pragya Misra Mehrishi (External representative)

Specified e-mail id: rita@birlas.com

Greater Noida and Offices in Delhi:

- Ms. Semi Pandita, Chairperson (Greater Noida Unit)
- Ms. Rita Abhilashi, Member (New Delhi Office)
- Mr. Madhu Babu Yenike (Greater Noida Unit)
- Ms. Pragya Misra Mehrishi (External representative)

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