

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. POLICY

Veto Switchgears and Cables Limited is committed to creating a healthy working environment that enables employees to work without any fear of prejudice, gender bias and sexual harassment. The company ensures that every employee should be treated with dignity and respect. This policy will be known as "POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE".

2. 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 workplace includes:

- i. All offices and premises where the Company's business is conducted.
- ii. All company-related activities performed at any other site away from the Company's premises.
- iii. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

3. DEFINITION OF SEXUAL HARASSMENT

As per section 2(n) of the Sexual Harassment of Women at workplace (Prevention, Prohibition & Redressal) Act, 2013, Sexual harassment includes any one or more of the following unwelcomed acts or behavior (whether directly or by implication), namely-

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

Section 3(2) of the Act further elaborates that if any of the following Circumstances occurs or present in relation to or connected with any act or behaviour of sexual harassment among other circumstances, it may amount to sexual harassment-

- Implied or explicit promise of preferential treatment in her employment, or

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- Implied or explicit threat of detrimental treatment in her employment, or
- Implied or explicit threat about her present or future employment status, or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her, or
- Humiliating treatment likely to affect her health or safety.

4. RESPONSIBILITY 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.

5. INTERNAL COMPLAINT COMMITTEE

a) A Committee has been constituted by the Management to consider and redress complaints of Sexual harassment. The Committee Comprises of the following

- i. Ms. Jyoti Gurnani, Chairperson
- ii. Mr. Priavrat Sharma, Member
- iii. Ms. Bharti Ajmera, Member
- iv. Mr. Anirudh Mathur, Member

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

6. REDRESSAL PROCESS

- I. Any employees who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- II. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- III. The Committee will hold a meeting with the complainant within five days of the receipt of the complaint, but no later than a week in any case.
- IV. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his/her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- V. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- VI. In the event, the complaint does not fall under the purview of Sexual Harassment or the Complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.
- VII. In case the Complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

7. ENQUIRY PROCESS

- I. The Committee shall immediately proceed with the enquiry and communicate the same to the Complainant and person against whom complaint is made.
- II. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him/her an opportunity to submit a written explanation if she/he so desires within 7 days of receipt of the same.
- III. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- IV. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- V. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.
- VI. The Committee shall call upon all witnesses mentioned by both the parties.
- VII. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- VIII. The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the HR. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- IX. The HR will direct appropriate action in accordance with the recommendation proposed by the Committee.
- X. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or by any other legislation enacted later on.

8. OTHER POINTS TO BE CONSIDERED

- The Committee may recommend to the HR action which may include transfer or any of the appropriate disciplinary action.
- The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Veto Switchgears and Cables Limited shall take all steps necessary and reasonably to assist the affected person in terms of supported and preventive action.
- The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to HR.
- In case the Committee fined 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.

Jyoti Gurnani

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