



## POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

### **Background**

The Government of India, has enacted “The Sexual Harassment of Women in Workplace (Prevention, Prohibition and Redressal) Act, 2013” (hereinafter the Act’) and “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013” (hereinafter the Rules) based on the observations made by the Hon’ble Supreme Court of India in Vishaka vs. State of Rajasthan. The Act and the Rules framed there under aims to prevent sexual harassment against women in order to promote safe and healthy working conditions for them.

The Company firmly believes and is committed to honour the fundamental rights of a woman to equality as per Articles 14 and 15 and her right to live with dignity as mentioned under Article 21 of the Constitution.

Since inception, the company is committed to create a goods and healthy working environment for all the employees of the Company at all level without and discrimination, to encourage equality of opportunity for all.

In view of the above background and philosophy of the Company, the management of the Company informally designated Ms. Victoria Wong, Assistant Manager and Ms. Snigdha Khetan, Company Secretary to act as designated officer to redress complaint relating to sexual harassment, directly or indirectly of the employees at work place.

The company adopted the formal policy on prevention of sexual harassment at workplace, which is as follows:

### **I. SHORT TITLE AND COMMENCEMENT**

This Policy may be called the Prevention of sexual harassment at workplace. It is extended to the Company as a whole and includes all office premises, factory premises, outlets and all other areas where the operation of the Company extends and are within the control of the Company and will also include notional extension of operations such as place visited by the employees arising out of or during the course of employment including transportation provided by the employer for undertaking such journey. It also includes any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relation.



## II. DEFINITIONS

- a) **'Employee'** shall mean all persons directly or indirectly employed by the Company or otherwise fall under the category of 'employee' within the meaning of section 2(f) of the Act.
- b) **'Connected Person'** shall include any consultant or an office bearer of any Auditor, Contractor, Consultant, Agent, Supplier, Purchaser, Banker of the Company who is directly or indirectly connected with the business of the company.
- c) **'Employer'** shall have the same meaning as defined in section 2(f) of the Act, which will include the Board of Directors of the respective Company.
- d) **'Internal Complaints Committee'** or ICC shall mean a four-member committee constituted by the employer to prevent and address the incidence of sexual harassment in the company and will be located at the corporate office of the respective Company at Kolkata.
- e) **'Regional Complaints Committee'** or RCC shall mean four-member committee constituted by the employer to prevent and address the incidence of sexual harassment in the Company under the supervision of ICC and will be located at Kolkata.
- f) **'Sexual Harassment'** shall include any form of verbal or physical behaviour which is unsolicited and unwelcome and interferes with an individual female worker or employee's work performance by creating an intimidating/insecure working environment or any unwelcome sexually determined behaviour (whether directly or by implication) in any form, such as:
  - i. Physical contacts and advances
  - ii. A demand or request for sexual favours
  - iii. Sexually coloured remarks
  - iv. Showing pornography
  - v. Any other unwelcome physical, verbal or other conduct of sexual nature

Against any female employee, worker or connected person in the workplace during or after office hours.

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- g) **'Complainant'** shall mean a female employee or connected person who has been subject to sexual harassment or any employee or connected person reporting an incident of sexual harassment.
- h) **'Compliant'** means complaint of sexual harassment as defined under Section 9 of the Sexual Harassment of Women in Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- i) **'Respondent'** shall mean any employee who is alleged or reported to have committed any act of sexual harassment.

### III. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

### IV. 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

### V. COMPLAINTS COMMITTEE:

The Company has instituted an Internal Complaints Committee (**ICC**) at its corporate office located at 53A, Mirza Ghalib Street, Arihant Building, 3<sup>rd</sup> Floor, Kolkata 700016 for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound disposal of such complaints with just and equity.

The present ICC comprises the following members:

- |                       |                     |
|-----------------------|---------------------|
| 1. Ms. Victoria Wong  | - Presiding officer |
| 2. Mr. Rohan Ghosh    | - Member            |
| 3. Ms. Snigdha Khetan | - Member            |
| 4. Ms. Mohuna Dutta   | - External Member   |

### VI. POWERS AND DUTIES OF THE ICC AND RCC

The ICC is empowered to exercise all powers as vested to it under the provisions of the Sexual Harassment of Women in Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

**53A, Mirza Ghalib Street, Arihant Building, 3<sup>rd</sup> Floor, Kolkata 700016**



## VII. 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 Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. 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 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.

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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. Counselling
  - 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.

## VIII. 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.

## IX. 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.

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## X. 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.

## XI. 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.

**Tai Industries Limited**

*Snigdha Khetan*

**Snigdha Khetan**  
**Company Secretary**

**Dated: 28<sup>th</sup> January, 2025**