

POLSON LIMITED

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES IN POLSON LIMITED

1.0 POLICY

1.1 POLSON Ltd. is a forward looking equal opportunity employment company. Taking into consideration the guidelines issued by the Supreme Court of India and the Bill for Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Bill 2012 approved by the Lok Sabha and having received the Presidents assent though not converted into an Act, Polson would like to put in place a formal policy on Sexual Harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

1.2 The Supreme Court has also directed companies to lay down guidelines and a forum for Redressal of grievances related to sexual harassment.

2.0 SCOPE AND EFFECTIVE DATE

2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

2.2 "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

2.3 Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- i) physical contact and advances or;
- ii) a demand or request for sexual favours or;
- iii) making sexually coloured remarks, jokes, letters, phone calls, sms, emails, lurid stares, or molestation or stalking, sounds, display of pictures, signs, verbal or non verbal communication which offend the individuals sensibilities and affect her/his performance or;
- iv) showing pornography or;
- v) any other unwelcome physical, verbal or non verbal conduct of sexual nature;
- vi) eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;



- vii) act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- vi) any unwelcome gesture by an employee having sexual overtones

3.0 COMPLAINT REDRESSAL COMMITTEE

3.1 A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

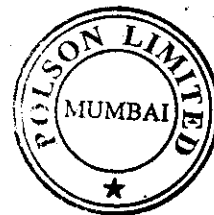
Committee

1. Chairperson
2. Member
3. Member
4. NGO Lady representative - Member

3.2 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, two of whom shall be a lady.

4.0 REDRESSAL PROCESS

- 4.1 Any employee 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.
- 4.2 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.
- 4.3 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.
- 4.4 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.



- 4.5 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.
- 4.6 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.
- 4.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

5.0 ENQUIRY PROCESS

- 5.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 5.2 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.
- 5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 5.4 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.
- 5.5 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.
- 5.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 5.7 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.
- 5.8 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 VP-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.
- 5.9 The Managing Director will direct appropriate action in accordance with the recommendation proposed by the Committee.



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5.10 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

6.0 OTHER POINTS TO BE CONSIDERED

6.1 The Committee may recommend to the Managing Director action which may include transfer or any of the other appropriate disciplinary action.

6.2 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, TPC shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

6.4 The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to the Managing Director.

6.5 In case the Committee find 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.

7.0 CONFIDENTIALITY, RECORD-KEEPING AND MEDIA STATEMENTS

7.1 At all stages of the procedures, non - formal and formal, and from the first discussions when the potential allegations of sexual harassment are discussed, all parties to the discussion are required to be aware of the sensitivity of the matters under discussions, the potential impact on individual lives and careers, and to exercise extreme caution in the disclosure of the information, and where possible to maintain the confidentiality of the receiver and complainant and the person responsible for the behaviour.

7.2 Once the procedures are concluded, the documents should be filed in sealed envelopes marked confidential, and lodged with the person responsible for the retention of personnel records.

7.3 Any requests for information from Media sources should be referred to the person within the company responsible for Media briefings.

8.0 MANAGEMENT RESPONSIBILITY

8.01 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

8.02 Management has the responsibility to ensure that all allegations of sexual harassment are handled in a sensitive manner, with respect for the dignity of the persons involved.



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8.03 Management has the duty to ensure a safe and secure workplace, and if there is any indication that there may be a physical threat of danger to any person, professional advice should be sought from internal persons responsible for safety and security, and where appropriate from external authorities and professional persons.

8.04 Management is responsible for ensuring that the allegations are dealt with timely, with due seriousness and confidentiality; and that the allegations are dealt with in a manner which achieves a resolution of the behaviour, rather than in a mechanistic procedural manner.

9.0 PHYSICAL AND MENTAL HEALTH

9.01 Management may seek appropriate professional advice and arrange for trauma counselling for the receiver; where this is required the initial trauma counselling should take place within a few days of the incident; follow-up counselling over a longer period may also be necessary.

9.02 Leave of absence may also be necessary, and Management will give permission for this, and if the complainant's sick leave entitlement is exhausted, additional sick leave may be granted.

10.0 DISCIPLINARY ACTION

10.01 Where the behaviour was not intended to cause offence, and is of a less serious nature, such as use of inappropriate words, or jokes, or simple contact cell-phone messages, or invitations, counselling of the person responsible for the behaviour may be appropriate;

10.02 Repeated incidents of less serious behaviour or more serious behaviour may lead to a final warning in writing;

10.03 Serious incidents of sexual harassment may lead to summary dismissal;

10.04 Where appropriate and where possible with the company structure, and depending upon the nature of the work undertaken by the complainant and the person responsible for the behaviour, sanctions to avoid dismissal such as transfer to a different position or department may be considered.

10.05 In all situations, behaviour of the person charged with sexual harassment will be strictly monitored by the complaints committee and / or by the HR department during the post enquiry phase.

10.06 The above disciplinary mechanism would be used judiciously to ensure fair and healthy working environment within the organisation and keep the morale of the employees high.



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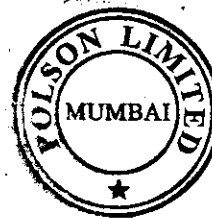
11.0 MALAFIDE COMPLAINTS

11.01 If the investigations reveal that the complaint is unjustified or complainant had raised the concern with ulterior motives, the HR Head will counsel the complainant and recommend suitable action to prevent recurrence while ensuring the complainant is not victimized or other associates deterred from raising concerns in the future. The individual who provided the false information will be subject to disciplinary action, up to and including termination of employment

12.0 TRAINING AND DEVELOPMENT

In situations of alteration in statute it would be the responsibility of HR team and business heads to conduct regular sessions / training programs on such important issue and create an excellent, comfortable work environment for the employees.

- 12.01 All Senior Management are required to attend executive briefings on their legal duties and responsibilities in the handling of sexual harassment allegations.
- 12.02 All Management and Supervisors are required to attend the training on how to handle allegations of sexual harassment brought to their attention, either non formally, or as part of the formal Grievance Procedure.
- 12.03 All new employees are required to be made aware of this policy and to be encouraged to ask questions and to seek clarification on any aspect of the policy which is not clear.
- 12.04 Skills training is also be required for those who may receive the complaints, not only on how to deal with the complaints, but also mediation and conflict resolution skills, and delegates to these training workshops should include: supervisors, managers, and human resource personnel.
- 12.05 A copy of this Policy shall be given to all employees and to all new recruits and they shall sign a statement acknowledging that they have received, read, understood and will abide by the Policy.



13.0 CONCLUSION

At Polson Limited, it has been the constant effort of all employees in creating conducive work environment where the relationship between male and female employees is extremely cordial. The company is committed to the implementation of the objectives of this policy, of procedures laid down, to the training of all employees in what constitutes sexual harassment, how complaints may be lodged, and how the complaints should be dealt with by supervisors, managers and members of the complaints committee

The sexual harassment policy is subject to change periodically as and when the organization requires.

Notwithstanding anything contained herein the Company and Managing Director reserves the right to alter, modify, add, delete or amend any of the provisions of this Policy without any prior notice/authority/permission.

