

**POLICY**  
**ON**  
**PREVENTION**  
**OF**  
**SEXUAL HARASSMENT**  
**AT**  
**WORKPLACE**

## **1. INTRODUCTION**

Niraj Cement Structurals Limited (“the Company”) is committed to providing a safe and respectful work environment to its employees that enables employees to work without fear of prejudice, harassment or any form of intimidation or exploitation. The Company believes that all employees have the right to be treated with dignity.

The Company does not support discrimination of individuals on the basis of race, color, gender, age, national origin, religion, sexual orientation, marital status, citizenship and disability.

Sexual Harassment at Workplace is Strictly Prohibited. The Company treats Sexual Harassment as gross misconduct under the service rules and other applicable laws and action will be initiated appropriately for such misconduct. This Policy is framed based on the aforesaid principles and to meet the requirements stipulated by “The Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules made there under.

## **2. PURPOSE OF THE POLICY**

This Policy shall provide Protection and Prevention against Sexual Harassment at Workplace and for Redressal of complaints of Sexual Harassment and matters connected therewith.

## **3. APPLICABILITY**

This Policy applies to all the employees who are on the rolls of the company; it applies to probationers, permanent employees and to trainees (whether in the office premises or outside while on assignment).

#### **4. COMPLAINTS PROCESS**

If you have been subjected to Sexual Harassment by anyone including visitors or other non-employees during your official duties and/or at workplace, you should:

- a. Tell the offender that his/her behavior is unwelcome and ask him/her to stop immediately. However at this stage, if you wish to make a complaint you may choose to do so.
- b. Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is helpful and necessary to have a record of events, since such a record can strengthen your case and help you remember the details over time.
- c. If after telling the offender to stop the behavior, the Sexual Harassment continues, report the abuse to the Internal Committee Member in writing.
- d. The complainant could also write an email and send it at [cs@niraj.co.in](mailto:cs@niraj.co.in) for submitting sexual harassment complaint with all details clearly mentioning name, other identity and contact details. Anonymous complaints will not be investigated.
- e. Such a complaint should be made in writing and within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. While submitting your written complaint it is necessary to submit 6 copies of the complaint along with supporting evidences and the names and addresses of the witness.
- f. Once the Complainant makes a complaint it is necessary to keep the information about the complaint "Strictly Confidential".
- g. If an aggrieved woman is unable to make a complaint in writing due to her physical and/or mental incapacity, a complaint may be filed by:
  - i. Her relative or friend; or
  - ii. Her co-worker; or
  - iii. Any person who has knowledge of the incident to file a complaint but after having a written consent of the complainant.

## 5. INTERNAL COMMITTEE

For the purpose of handling and addressing any of the complaints under Sexual Harassment an Internal Committee has been formed. Details of the names of the Committee are as follows:

<b>Mr. Vishram Pandurang Rudre</b>	<b>Presiding Officer</b>
<b>Mr. Sudhakar Balu Tandale</b>	<b>Member</b>
<b>Mr. Kumar Anil Radheshyam</b>	<b>Member</b>

## 6. FALSE COMPLAINTS

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of Sexual Harassment. However, if on inquiry by the Internal Committee it is revealed and concluded that the complaint was made with a malicious intent or the complainant or any other person making the complaint has made the complaint knowing it to be false, forged or misleading document submission and with the motive of maligning the concerned individual / tarnishing her/his image in the company and to settle personal/professional scores, it will recommend to the Chief People Officer to take any action including a written apology, warning, reprimand, withholding of promotion, withholding of pay rise, terminating the Complainant or the concerned employee from service or undergoing a counseling session or carrying out community service.

During the inquiry mere inability to substantiate a complaint or provide adequate proof may not attract action against the complainant.

## 7. MANAGEMENT RESPONSIBILITIES

- a. Display the policy on the Company's website with names and contact details of all members of the Internal Committee.

- b. Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- c. Assist in securing the attendance of respondent and witnesses before the Internal Committee and make available such information to the Internal Committee in context of the complaint.
- d. Provide assistance to the aggrieved woman for filing a complaint and also for initiating action against the respondent in relation to the offence under the Indian Penal Code or any other law for the time being in force, if the aggrieved woman chooses the same;
- e. Information pertaining to the number of cases filed and their disposal, as applicable to be included in the Annual Report of the Company.
- f. Company will organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the 2013 Act and capacity building programs for the members of the Internal Committee.
- g. Display at any conspicuous place at the workplace the penal consequences of sexual harassments; and the constitution of Internal Committee.

#### **8. AMENDMENT TO THE POLICY**

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

**ALL MATTERS WHICH ARE NOT SPECIFICALLY OUTLINED IN THIS POLICY SHALL BE GOVERNED AS PER THE APPLICABLE LAWS AND/OR DECIDED BY THE INTERNAL COMMITTEE, FROM TIME TO TIME.**

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