

Anti-Sexual Harassment Policy

Introduction:

Greenlam Industries Limited (the "Company") is committed to provide an attractive working environment for its employees and to provide safe and healthy working conditions. It is the Company's policy to prohibit harassment of any kind. The employees of the Company are expected to act in accordance with the Company values and Business principles and to comply with Company policies, laws and regulations.

The Company has a Code of Conduct which every employee of the Company is required to follow. Sexual Harassment at work place is discriminatory, unlawful and violates the Code of Conduct. Keeping in line with this philosophy the Company is recording details of policy relating to 'Sexual Harassment' if incidents of such nature happen at work.

1 Short Title Extent and Commencement

This Policy will be called the ' Anti-Sexual Harassment Prohibition Policy' in the Company and will extend to all Employees of the Company.

2. Definitions

"Sexual Harassment" includes any unwelcome, sexually determined behavior, direct or by implication, and includes:

- 1) Any physical contact and advances;
- 2) A demand or request for sexual favours;
- 3) Sexually colored remarks;
- 4) Showing pornography;
- 5) Display or distributing sexually explicit drawings, picture or written material, including but not limited to email or internal materials.
- 6) Sexual jokes or innuendo.
- 7) Derogatory or stereotypical comments about members or one sex versus another.
- 8) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

For the purposes of this policy "Sexual Harassment" shall include, but will not be confined to the following:

- i) Forcible physical touch or molestation;
- ii) Eve teasing and physical confinement against one's will;
- iii) Deliberately creating a hostile, humiliating or intimidating work environment in a manner that is sexually discriminatory;

Any of these above acts shall be treated as violation of the code of conduct of the company and the Company on sue moto or on written complaint made by any employee of the Company shall take disciplinary action. .

"Employee" means any person on the rolls of the Company including temporary employee by whatever name called and would include employees engaged on Contract workers, casual or temporary basis, consultants, Management Trainees, Apprentice or Interns or project basis.

3. Scope of the Policy

This Policy will be applicable to allegations of Sexual Harassment made by an Employee or against an Employee at workplace of the Company.

4. Complaints Committee

- (i) A Complaints Committee has been constituted by the Managing Director of the Company to consider and deal with all complaints of alleged Sexual Harassment and otherwise implement this policy.
- (ii) The Complaints Committee will consist of one Presiding Officer (Woman) and minimum three members or such other number of members as maybe constituted from time to time to deal with complaints of such nature.
- (iii) The Complaints Committee will be headed by a woman and not less than half of its members will be women.
- (iv) One member will be from Non-Government Organization or anybody familiar with issue of sexual harassment.
- (v) Following is the current constitution of the Complaint Committee and any changes in the composition of the Committee shall be updated in the Annexure.

Sl.No.	Name of Member	Committee details	Designation	Contact No.	Email ID
1	Nivedita Mukherjee	Presiding officer	DGM-Admin	+919717595669	nivedita.mukherjee@greenlam.com
2	Prashant Srivastava	Member	VP-HR, Admin & CSR	+919958989090	prashant.srivastava@greenlam.com
3	Ruchi Sharma	Member	DM-HR	+919958900541	ruchi.sharma@greenlam.com
4	Seema Chhabra	Independent Member	Advocate	+919811882104	adv.seemachhabra@gmail.com

5. Redressal Mechanism:

Any Employee or Outsider ("Complainant") may lodge a complaint of alleged Sexual Harassment against any Employee ("Opposite Party") in any of the following ways:

- (i) In writing to the Presiding Officer; or
- (ii) Any of the members of the Committee.
 - A. Such a complaint should be in writing, made as soon as possible, and in any case preferably within 3 months from the date of occurrence of the alleged incident.
 - B. The complaint will be forwarded to the Complaints Committee immediately upon receipt of the complaint.
 - C. The Complaint Committee on receipt of the Complaint shall forward one copy of the same to the respondent within 7 working days seeking explanation on the allegation.
 - D. The respondent shall file his reply within 10 working days to the Committee along with supporting documents, if any.

- E. Both the Complainant and the Respondent will be informed latest within a period of 10 days of the receipt of the complaint by advance written intimation about a meeting to be held by the Complaints Committee.
- F. The Complaints Committee will hold a meeting to investigate all relevant details. It will do so with all possible care, sensitivity and confidentiality.
- G. The meeting of the Complaints Committee will be at such location as may be decided by the Presiding officer of the Complaints Committee keeping in view the need to maintain confidentiality of the complainant / Opposite Party.
- H. During the investigation procedure, none of the parties shall have a right to be represented by any outsider.
- I. The Complainant shall be heard and his/ her statement recorded (Statement of Allegation) and all reasonable opportunity will be given to plead his/her case. The Complainant shall be at liberty to produce corroborative documentary or oral evidence, etc., to substantiate his / her complaint.
- J. The Respondent will also be given an opportunity to explain the substance of the case and all reasonable opportunity will be given to plead his/her case. The Opposite Party shall be at liberty to produce corroborative documentary or oral evidence, etc., to substantiate his /her explanation.
- K. If the Complainant/Respondent does not appear before the Complaints Committee or refuses to participate in the proceedings for any reason, the Complaints Committee shall be at liberty to proceed ex parte decision and complete the investigation in his/her absence, if the Complainant/respondent fails without sufficient cause to present himself/herself for three consecutive hearings convened by the presiding officer subject to 15 days advance notice in writing to the party concerned.
- L. The Complaints Committee shall complete this process and submit its report of its findings to the Managing Director of the Company within 90 days after receiving the complaint unless exceptional circumstances require the process to be extended.
- M. If after the investigation as aforesaid, the Complaints Committee comes to a conclusion that no case of Sexual Harassment is made out, or that the Complaint on the face of it does not disclose an offence of Sexual Harassment, the Complaints Committee shall submit a report to the Managing Director with such finding with 3 working days of completion of all Enquiries. Based on such report the Managing Director may consider dropping the complaint after recording the reason/ s thereof.
- N. If after the investigation as aforesaid, the Complaints Committee comes to a conclusion that the charge of Sexual Harassment is established it will submit a Report to the Managing Director giving its 'findings. In such an event the Managing Director will through its Human Resource Department take appropriate action as per service rules of the Company against the offending opposite party based on the circumstances and seriousness of the act which may include issue of dismissal.
- O. In case the complaint made by the Complainant is -found to be false at any stage or is baseless or not made in good faith the Complaints Committee will give report to that effect giving the reasons for arriving at such a finding. In such an event the Complainant will render herself/himself liable for filing such false complaint.
- P. If any such incident constitutes a criminal offence, the Company shall consider informing the relevant authority like Labour dept. Police and National Commission of Women (NCW) and provide full details and request appropriate action.
- Q. The Company will ensure that the career interests of the Complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.
- R. The Complaints Committee shall be governed by such rules as may be set by the Greenlam Privacy code of conduct and any other additional rule as may be implemented by the Company from time to time, taking into account the best practices from India.

7. Confidentiality:

- a) The Complaints Committee will maintain confidentiality during the time of investigation / enquiry and thereafter.
- b) The Complainant, Opposite Party, witnesses and employees who become aware of the incident must maintain confidentiality of the investigation process.

8. Obligation of the Management

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

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