

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES IN SHREE PACETRONIX LIMITED

1. POLICY

SHREE PACETRONIX LIMITED [hereinafter referred to as ("the Company")] is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

The Company has zero-tolerance for sexual harassment and values each and every employee working and wish to protect their dignity and self respect. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder [hereinafter referred to as ("the Act")] clearly state that commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action. The Company's policy on sexual harassment is part of its overall affirmative action efforts. Specifically, this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redress of complaints of sexual harassment and for matters connected therewith.

2. SCOPE AND EFFECTIVE DATE

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.

"Sexual harassment" would mean and include any of the following:

- i) unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;



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E-mail : pacetronix@hotmail.com
Web Site : www.pacetronix.com

Bangalore Address :
201, Sai Apartment, 10th Cross,
2nd Main, N.R. Colony, Bangalore - 19

Kolkata Address :
Swastik Apartment, Ground Floor,
1, Sardar Sankar Road, Tolly Gunj,
Kolkata - 700026
Ph.: (033) 2464 8931 Fax : 2465 7753

ii) unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;

iii) eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

iv) 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;

v) conduct of such an act at work place or outside in relation to an Employee of the Company, or vice versa during the course of employment;

vi) any unwelcome gesture by an employee having sexual overtones; and

vii) In addition to the instances mentioned hereinabove, any other acts or behaviour, which outrages the modesty of a female employee, will be considered as sexual harassment.

"Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

3. INTERNAL COMPLAINTS COMMITTEE (ICC)

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:

- | | |
|---------------------------|-----------------------------------|
| 1. Mrs. Amita Sethi | Chairperson cum Presiding Officer |
| 2. Mr. Atul Kumar Sethi | Member |
| 3. Mr. Vikas Gokhale | Member |
| 4. Mr. Sushil Kumar Patni | Member |

A quorum of atleast 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.



4. REDRESSAL PROCESS

Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the ICC giving details of the sexual harassment meted out to her within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the ICC.

The Presiding Officer or any Member of the ICC can render reasonable assistance to the aggrieved woman for making complaint in writing, in case they are unable to do so.

On receipt of complaint, the ICC shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The ICC shall follow principle of natural justice while handling such complaints.

(i) Where the aggrieved woman is unable to make a complaint on account of their physical incapacity, a complaint may be filed by

- a) a relative or friend; or
- b) a special educator or
- c) a qualified psychiatrist or psychologist; or
- d) the guardian or authority under whose care they are receiving treatment or care; or
- e) any person who has knowledge of the incident jointly with any of the abovementioned persons.

(ii) Where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.

(iii) Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

5. INQUIRY PROCESS

The aggrieved woman or person authorized on her behalf as per the aforesaid provision, shall make a complaint to the ICC as per the Act.

The ICC may before initiating an inquiry, and at the aggrieved woman's request, attempt to settle the matter through conciliation. However, ICC shall ensure that no monetary settlement shall be made as a basis of conciliation.



Where, a settlement is arrived as mentioned hereinabove, no further inquiry shall be conducted by the ICC. The Committee may, during such investigation, exercise the power of a civil court, vested in it, in respect of:

- summoning and enforcing the attendance of any person and examining him under oath;
- requiring discovery and production of documents;
- any other prescribed matter.

6. MANNER OF ACTION

1. The ICC shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
2. If the allegation against the respondent has not been proved, the ICC may recommend that no action needs to be taken in the matter.
3. Except in cases where service rule exists, if the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take any action for sexual harassment as a misconduct including:
 - a. Written apology to the complainant, warning, reprimand or censure;
 - b. Withholding of promotions, pay rise or increments of the Respondent, terminating the Respondent from service;
 - c. Undergoing a counseling session or carrying out community service.
 - d. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine.

Such action will be taken within 60 days of the receipt of report.

7. ACTION FOR FALSE AND MALICIOUS COMPLAINTS

Any complaint of sexual harassment shall be taken up with utmost seriousness by the Company. However, there shall be zero tolerance for any false and malicious complaint.



8. RESPONSIBILITIES AND DUTIES OF THE EMPLOYER

The responsibilities and duties of the Employer are as under:

- a. Provide a safe working environment.
- b. Formulate and widely disseminate an internal policy or charter declaring prohibition, prevention and redressal of sexual harassment at the workplace.
- c. Display conspicuously at the workplace, the penal consequences of indulging in acts that may constitute sexual harassment and the composition of the ICC.
- d. Declare the names and contacts details of all members of the ICC.
- e. Organise workshops and awareness programmes at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment and organising orientation programmes for members of the ICC.
- f. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.
- g. Cause to initiate under the Indian Penal Code, 1860.
- h. Provide assistance to the aggrieved woman if she so desires to file a complaint in relation to the offence under the IPC or any other law for the time being in force.
- i. Treat sexual harassment as misconduct under the service rules and initiate action for misconduct.
- j. Prepare an annual report with details on the number of cases filed and their disposal and submit the same to the concerned authority.
- k. Monitor the timely submission of reports by the ICC.



9. CONCLUSION

The Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees. The identity and address of the aggrieved woman, respondent and witnesses shall not be published or disclosed to the public or media.

BY THE ORDER OF THE BOARD
FOR SHREE PACETRONIX LIMITED
CIN: L33112MP1988PLC004317



ATUL KUMAR SETHI
MANAGING DIRECTOR
(DIN-00245685)