

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

<b>Document Name</b>	<b>Policy on Prevention of Sexual Harassment at workplace</b>
Abstract	To formulate guidelines and procedures for mandatory compliance on The Sexual Harassment Of Women At Work Place (Prevention, Prohibition & Redressal, act, 2013)
Security Classification	Internal

**COMMITMENT:**

Our Company is committed to provide work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

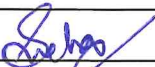
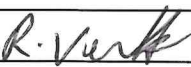
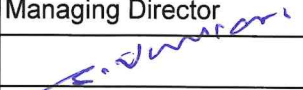
The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

**SCOPE & PURPOSE:**

The objective of this policy is to provide protection against sexual harassment of any employee at workplace and for the Prevention and Redressal of complaints of Sexual Harassment and for matters connected there with.

**Scope, Background & Purpose of this Policy:**

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 is a legislative act that seeks to protect women from sexual harassment at their place of work.
- It was passed by the Lok Sabha on 3 September 2012. It was passed by the Rajya Sabha on 26 February 2013. The Bill got the assent of the President on 23 April 2013. The Act came into force from 9 December 2013.
- This is an Act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.
- The Act defines sexual harassment at the work place and creates a mechanism for redressal of complaints. It also provides safeguards against false or malicious charges.

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The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices /branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit.

**All "employees" defined under the Act are covered: -**

Permanent, Temporary, Ad-hoc, Trainee, Contract, Daily wages, Voluntary, Probationers,

Apprentices, part time or working as consultants, Visitors.

The policy is applicable to all the allegations of sexual harassment by an employee against another employee within company (office & site) premises, or official company functions (Parties and socials) or any business trips and official travel or transportation by company transport for official work.

It shall also be applicable in respect of all allegations of sexual harassment made by a third party / contractor / service provider / customer against an employee or made by an employee against a third party / contractor / service provider / customer, if the sexual harassment is alleged to have taken place within company premises or at the location of customer/vendors/service providers/contractors etc.

**Definition of Sexual Harassment**

Sexual Harassment has traditionally been divided into two well-known forms:

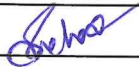
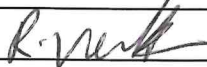

**Quid pro Quo**

**Hostile work environment**

"Quid Pro Quo" literally means "this for that". Applying this to sexual harassment, it means seeking sexual favours or advances in exchange for work benefits such as promises of promotion, higher pay, academic advancements etc. This type of sexual harassment mostly holds a woman to ransom as her refusal to comply with a 'request' can be met with

retaliatory action such as dismissal, demotion, memos, tarnished work record and difficult work conditions.

"Hostile work environment" is a less clear yet more pervasive form of sexual harassment. It commonly involves conditions of work or behaviour towards a female worker, which make it unbearable for her to be there. While the worker is never promised, or denied anything in

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this context, unwelcome sexual harassment occurs simply because she is a woman. Understanding Instances of Sexual Harassment, A number of surveys revealed that a number of unwelcome actions by fellow colleagues are causing harassment among women workers.

**Some examples of behaviour that constitute Sexual Harassment at the workplace:**

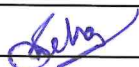

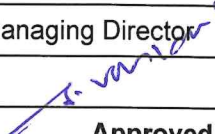
- Making sexually suggestive remarks or innuendos.
- Serious or repeated offensive remarks, such as teasing related to a person's body or appearance.
- Offensive comments or jokes.
- Inappropriate questions, suggestions or remarks about a person's sex life.
- Displaying sexist or other offensive pictures, posters, mms, SMS, WhatsApp, or e-mails.
- Intimidation, threats, blackmail around sexual favours.
- Threats, intimidation or retaliation against an employee who speaks up about unwelcome behaviour with sexual overtones.
- Unwelcome social invitations, with sexual overtones commonly understood as flirting.
- Unwelcome sexual advances which may or may not be accompanied by promises or threats, explicit or implicit.

**KEY ELEMENTS OF WORKPLACE SEXUAL HARASSMENT**

Workplace sexual harassment is sexual, unwelcome and the experience is subjective. It is the impact and not the intent that matters and it almost always occurs in a matrix of power.

Some examples of behaviour that may indicate underlying workplace sexual harassment and merit inquiry:

- Criticizing, insulting, blaming, reprimanding or condemning an employee in public.
- Exclusion from group activities or assignments without a valid reason.
- Statements damaging a person's reputation or career.

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- Removing areas of responsibility, unjustifiably.
- Inappropriately giving too little or too much work.
- Constantly overruling authority without just cause.
- Unjustifiably monitoring everything that is done.
- Blaming an individual constantly for errors without just cause.
- Repeatedly singling out an employee by assigning her with demeaning and belittling jobs that are not part of her regular duties.
- Insults or humiliations, repeated attempts to exclude or isolate a person.
- Systematically interfering with normal work conditions, sabotaging places or instruments of work.
- Humiliating a person in front of colleagues, engaging in smear campaigns.
- Arbitrarily taking disciplinary action against an employee.
- Controlling the person by withholding resources (time, budget, autonomy, and training) necessary to succeed

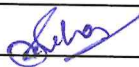
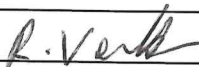
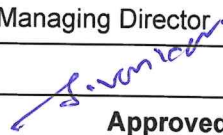
### Sexual Harassment - Digital World

The sexual harassment during pandemic has changed its face from the actual harassment to the cyber harassment. The cyber harassment happens where a person is harassed using various digital modes of communication. The IPC sections that are applicable for the physical harassment are applicable for the Cyber harassment too, in addition there are IT specific IPC are added which are applicable in case of any cybercrime.

- The definition of the workplace is company sponsored work time, assets, gadgets
- The definition of employee remains the same
- The definition of perpetrator & complainant remains the same
- The IC committee may conduct enquiry using the video conferencing because of the pandemic uncertainty

Following are some of the definitions of the Cyber crime

- **Doxing** - When someone is using your private information from various social sites to reuse it or misuse it publicly.
- **Implied Threat** - Threatening, using the internet in boxes, chat boxes. Personal calling for video calls

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- **Movie Sites** -Movie sites are producing movies, documentaries, biographies or knowledge series on various subjects that are uncensored and open to watch for everyone.
- **Social Media** - Internet social is used often so it's important to ensure that right messages are going to the recipients.
- **Multiple Windows** - Working on different platforms leads to opening of multiple windows. Especially when we are on call and while sharing a presentation or screen can expose these windows to the audiences.
- **Dress code** - Video call from home, to be done in Formal or Semi casual dress code. There have been issues with dress code related matters.
- **Cyber Stalking** - It is common and one is followed across various social site, messages are written, reached out to friends, troubled, followed the routine
- **Gossiping** - Common Chit-chatting turning into gossiping, maligning someone's image, creating stories based on various posts and interactions, being judgmental and opinionated.

**Internal Committee**

**Under Section 4 sub section (I) of the Act, "Every Employer of a workplace shall, by an order in writing, constitute a Committee, to be known as "Internal Committee".**


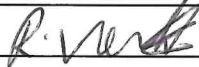
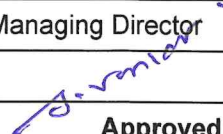
**Presiding Officer** - Senior most woman employee in the work place

**2 Members** - from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge

**External Member** - External members should have at least five years of experience working as a social worker in the areas of women's empowerment and workplace sexual harassment. They should also have knowledge, skills, and capacity to deal with workplace sexual harassment issues/complaints and a sound understanding of the legal aspects and implications

**The committee will:**

- Keep all complaints of sexual harassment confidential.
- Will deal with the complaints within the time frame prescribed.
- Meet once in every three months
- Review the need for any actions related to the implementation of the policy.
- Review and discuss any complaints received.
- Investigate and Coordinate the enquiry of complaints received.
- Suggest the penalty for the substantiated or un - substantiated complaints.
- Review and finalize actions on complaints related to third parties.

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## Complaint Handling and Inquiry Process

Step 1 – Written complaint is made to the ICC

Step 2 – Committee reviews and calls for a meeting

Step 3 – If Conciliation the case is closed

Step 4 – If it requires investigation the process is followed

Step 5 – ICC completes the investigation in three months

Step 6 – Recommendation is given to the company

Step 7- In case of any issues appeal can be made with the District Committee (Collector's office)


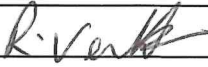
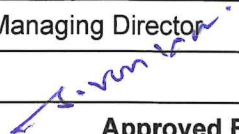
- A written complaint must be filed by the female employee within 90 days of the date of incident.
- The inquiry must be completed within 90 days.
- The inquiry report must be issued within 10 days from the date of completion of inquiry.
- Employer is required to act on the recommendations of the committee within 60 days of receipt of inquiry report.
- Appeal against the action of the employer is allowed within 90 days of the date of recommendation.

In case of Fake complaint appropriate actions are taken against a woman employee.

## Disciplinary Measures non-criminal offence (BNS Sections are not applied)

The committee may recommend to the Management / Employer (Managing Director/President Region) action/disciplinary measures which may include:

- Warning letters,
- Withdrawal of previous recognition awards,
- Suspension of service for a duration to be decided by ICC,
- Relocation and / or change of assignment,
- Loss of increment and withdrawal of any benefits,

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- Demotion,
- Dismissal or termination of service,
- Deduction of salary for compensation or any other disciplinary action.

The measures will be applicable to Substantiated complaints or Unsubstantiated complaints.

The Management shall provide all necessary assistance for effective implementation of the policy

### Handling of complaints with Third parties

- It is the intention of the organization to have a mechanism in place to address any complaints with or from third parties:
- vendors and customers
- All employees who have contact with customers are expected to conduct themselves in a professional manner.
- Complaints received from any third parties will be handled according to the guidelines for grievance handling defined in the policy applicable to internal complaints.
- Handling of complaints against a third party will discussed within the ICC and actions taken appropriate to the situation.

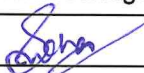
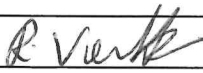

### Interim Measures

The Sexual Harassment Act empowers the ICC to recommend to the employer, at the request of the aggrieved employee, interim measures such as

- Transfer of aggrieved woman or respondent to another workplace.
- Grant of special leave of up to 3 months to the aggrieved woman.

### Prevention of Sexual Harassment Company Will:

- Create a safe working place.
- Sensitize all employees on the topic.
- Frame and display clear guidelines on Sexual Harassment and redressal process.

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- Publish information on the Act and our policy on the intranet.
- Conduct Training / Workshops at all levels.
- Create an Internal Complaints Handling Committee.
- Create dedicated email id posh@neochem , for registration of complaints.
- Publish information about Internal Complaints Committee and redressal process on company premises.
- Hold regular meetings of ICC and write reports of such meetings.
- Act on recommendations of the ICC after the close of the inquiry of complaint.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least two members, one of whom shall be a lady.

The Internal Complaints Committee is responsible for:

- Investigating every formal written complaint of Sexual Harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of Sexual Harassment.
- Discouraging and preventing employment-related Sexual Harassment

## **VIII. CONFIDENTIALITY:**

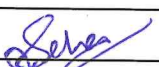
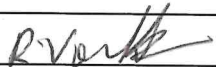

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

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.

### **I. 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.

### **I. PROTECTION TO COMPLAINANT / VICTIM:**

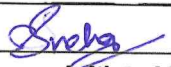
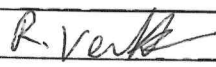
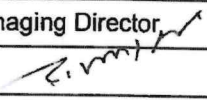
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Annexure A

Posh Committee Member for Lloyds Infrastructure and Construction Limited

Sr No.	Role	Name & Designation	Contact no.	Email Id
1	Presiding Officer	Sneha Jaiswal (AM - HR)	9664203136	saj@lloyds.in
2	Member	Karthi Manickam (GM – Civil)	8295919604	krm@lloyds.in
3	Member	Sandhya Rani Kothapali (Sr. Officer Commercial)	7709338609	kot@lloyds.in
4	Member	Suman Kumar (GM Civil - BHQ)	9137742361	sms@lloyds.in
5	Member	Pratik Dharod (GM -Finance)	8108634077	pad@lloyds.in
6	External Member	Ms. Rajashri Rajashekhar	9820012052	Poornam.shiksha@gmail.com

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