



SATIA INDUSTRIES LIMITED

PREVENTION OF SEXUAL HARASSMENT POLICY

Satia is committed to protecting the rights and dignity of its female members and creating a workplace free from all forms of sexual harassment. Thus, the Company has adopted the following policy to prevent or deter any acts of sexual harassment and streamline procedures for the resolution, settlement and prosecution of such acts. This policy has been framed in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder (POSH Act and POSH Rules). While the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

Furthermore, Satia upholds the belief that all members, irrespective of their gender, have the right to work in an environment safe from verbal or physical abuse and unsolicited or unwelcome sexual advances. With reference to this objective, we have adopted a gender-neutral approach within this policy. We are committed to providing redressal against sexual harassment of all members, irrespective of their gender, and take strict disciplinary action as provided under this Policy against any persons who are perpetrators of any and all forms of sexual harassment, regardless of the gender of the perpetrators.

In every instance throughout this policy, the terms "This Company," "The Company," "Company," and "Satia" signify "Satia Industries Ltd".

Member shall include any person on payroll of Satia Industries Ltd, including those working within the premises of the Company whether directly or indirectly (through contractor or outsourcing agencies)

1 Regulatory Provision

Sexual harassment at the workplace results in violation of the fundamental rights of a woman

- to equality under Articles 14 and 15 of the Constitution of India
- to life and to live with dignity under article 21 of the Constitution
- to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

This Policy has been framed in accordance with the provisions of “**The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013**” hereinafter referred as **POSH ACT,2013** and Rules framed thereunder. The Policy covers all the key aspects of the said Act and the Rules and for any clarification reference shall always be made to the said Act and the Rules and the provisions of the said Act and the Rules shall prevail

2 Definition of Sexual Harassment

- a) Physical contact and advances or a demand for sexual favours
- b) Making sexually colored remarks or showing pornography
- c) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- d) Implied or explicit promise of preferential treatment in his/her employment
- e) Implied or explicit threat of detrimental treatment in his/her employment
- f) Humiliating treatment likely to affect his/her health and safety

3 Applicability

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, apprentice/trainees and employees on contract at their workplace or at clients' sites. The Company will not tolerate sexual harassment, if engaged by any co-employee/ officer, executive officers of the Company or outsider while on office duty.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4 Internal Complaints Committee

- a) The CEO/MD shall constitute an internal complaints committee (hereinafter referred to as ICC) comprising of 3 to 5 members including a presiding officer.
- b) The Presiding officer of the ICC should be a senior lady employee with minimum 50% of the committee being women members. Preference to be given to members who are sensitive to this issue or have legal knowledge or social work exposure.
- c) The ICC members shall be nominated for a maximum tenure of three years after which a fresh nomination will be made by CEO.

5 Code of proceedings of Internal Complaints Committee

- a) The ICC will act upon a written complaint and where necessary guide the complainant in framing a written complaint. Such complaint should be received within three months of the incident having occurred but in case of special circumstances the presiding officer can extend this date by another three months. The presiding officer can further permit the legal heir or authorized nominee to represent the aggrieved person if the case so merits.
- b) The ICC will follow proper inquiry procedures and for this purpose will be vested with the following powers:-
 - 1 Summoning and enforcing the attendance of any person and examining him/her under oath.
 - 2 Requiring the discovery and production of documents and any other matter which may be prescribed.

6 Protection and Confidentiality of complainant

- a) During the inquiry, the ICC upon request from the aggrieved person can recommend to the management her transfer to any other workplace or sanction of special leave up to a maximum of three months or any other relief. This special leave shall be in addition to the entitled leave of the complainant.

- b) Identity of aggrieved person, witnesses, information relating to the conciliation and proceedings and recommendation of the ICC shall not be published, communicated or made known to the public or press in any manner.

7 Malafide Complaint

A simple inability to substantiate a complaint need not be treated as malafide, but if it is proved that the complaint was made with malicious intent and/or evidence has been tampered with, the ICC can recommend disciplinary action against the complainant.

8 Complaint Settlement

- a) Settlement of a complaint must be done within 90 days from date of receipt.
- b) If proved, disciplinary action will be recommended against the respondent by the ICC and if the respondent fails to comply with the same or separates from the organization, the case details can be forwarded to the Local Complaints Committee formed by the Government to take appropriate action.
- c) While finalizing a settlement, principles of natural justice should be followed and in case of a monetary penalty, the trauma of the aggrieved person and the financial capability of the respondent should be taken into account.
- d) Upon settlement a report in the prescribed format is to be submitted by the ICC to the CEO/MD.

REPORT FORMAT FOR INTERNAL COMPLAINTS COMMITTEE			
Complaint No.	Date Received		Date of Report
Details of Complaint			
Investigation Method			
Key Findings			
Recommended Actions			
Action Taken			
Closure with Complainant			
Attach All Investigation Report /Relevant/Notes/ Communications			
ICC Team Members	Name & Designation	Date	Signature
Presiding Officer			
ICC Member			
ICC Member			

9 Appellate Authority

- a) The MD/CEO will nominate an appellate authority for redressal of any complaint where the complainant feels that an adequate redressal has not been done or the accused feels that he/she has not been given a proper hearing.
- b) In all such cases, the ICC will re present the case details and their actions to the appellate authority.

10 Guidelines

- a) All Departments and admin offices to prominently display the names of the ICC with contact details as well as give wide publicity to this policy.
- b) The ICC members should be formally trained in conducting inquiries.