



SEXUAL HARASSMENT POLICY

(Prevention, Prohibition and Redressal)

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Introduction

Sexual harassment results in the violation of the fundamental rights of a woman. The protection against sexual harassment and her right to work with dignity are universally recognized human rights by international conventions. In view of the above, the Company has framed its Anti Sexual Harassment Policy for protection of women against sexual harassment at work place.

Policy

Anjani Portland Cement Limited (APCL) is committed to creating a healthy, positive working environment that enables employees to work without fear of gender bias, and sexual harassment. The Company also believes that all the employees of the Company have the right to be treated with dignity and work for achieving the goals and objections of the organization.

Company's Policy on Workplace Standards

1. The Company shall not tolerate any form of sexual harassment of its employees. All employees are expected to maintain the decorum of the office premises that is conducive to all employee to work in a dignified manner thereby to contribute and achieve the Company's goals and objectives.
2. The employees shall refrain from any acts of sexual harassment of other employees. Any form of threatening or insinuation, either explicitly or implicitly with sexual overtones or advances shall constitute sexual harassment.
3. Any employee, who believes that the other employee's actions or words constitute sexual harassment, has a responsibility to assist the concerned employee to report or complain about the situation either immediately or as soon as possible.
4. The Company prohibits any form of retaliation against any such employee, for bringing bona-fide complaint or providing information about any such incident. However, any complaint of sexual harassment other than by the affected employee shall not be entertained.
5. Where such conduct, in the workplace or during the course of employment, apart from coming under purview of the sexual harassment policy of the Company, it also comes under specific offence under the Indian Laws the Company shall initiate appropriate action in accordance with the law and provide all support to any person who is a victim of such conduct.

Scope and Effective Date

This Policy is applicable to all employees of the Company, as well as to all people who are on deputation in the Company or who are on contract in the Company. It shall come into force with immediate effect.

Definition of Sexual Harassment

Sexual harassment is any direct or indirect unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual.

1. Physical conduct of a sexual nature includes all unwanted physical contact.
2. Verbal forms of sexual harassment include unwelcome advances, requests, demands for sexual favours, innuendoes, suggestions, hints, sexual advances, comments with sexual overtones, sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed towards them, unwelcome and inappropriate inquiries about a person's sex life and unwelcome whistling directed at a person or group of persons.
3. Direct or indirect forms of non-verbal sexual harassment include unwelcome gestures, indecent exposure and the unwelcome display of sexually explicit pictures and objects.
4. Whoever publishes or transmits or causes to be published in any electronic form, any material which is lascivious or appeals to the prurient interest or if its effect is such as to tend to deprave and corrupt persons who are likely having regard to all relevant circumstance, to read, see or hear the matter contained or embodied in it. Such forms may include forwarding or sending explicit emails, photographs in any form, MMS or SMS, unintentionally or otherwise.

Objectives

The major initiative of the Company is

- To spread awareness to employees on the process available to safeguard and protect employees on the sexual harassment of employees in the workplace.
- To frame a standard guideline on the process for effective redressal of complaints of employees.
- To ensure that standard guidelines are given to appropriate authorities to deal with such complaints, thereby give safe and conducive workplace for all employees.
- To prevent any incident of sexual harassment of employees at the workplace.
- To set guidelines for acceptable & expected behavior of its employees at workplace.

It's the Company's endeavor to promote a safe, secure and productive working environment that emphasizes collective workforce and conducive workplace free from harassment & empowers members to work with dignity and without any inhibition.

The Company shall not allow or tolerate any such acts or conduct by any of its employees resulting in sexual harassment any employee and shall ensure the safety and security of its employees.

Internal Complaint Committee

A complaint committee will be formed to investigate the complaints of Sexual Harassment. The complaint committee will constitute of the following members:

- Mrs. Anu Nair, Company Secretary, Anjani Portland Cement Limited, Presiding Officer
- Mr. ML Kumavat, Chief Financial Officer, Anjani Portland Cement Limited
- Ms. Pooja Karia, Company Secretary, Chettinad Group
- Mr. A. Venkateswara Rao, Manager, Compliance Department

Who can complain?

Complaints can be made by

- a. Any aggrieved women employee, including any person on deputation or on contract working in the premises of the Company who is affected by any form of sexual harassment to them during the course of the their working in the premises of the Company.
- b. Any legal heir of the aggrieved person may make a complaint.

Against any person/persons, who is/are alleged to have committed an act of sexual harassment. No third party complaints will be entertained.

Reporting Procedure

Employees who believe they have experienced or observed sexual harassment should report their complaint immediately to below mentioned email id. All complaints shall be promptly handled on a confidential basis and appropriate action shall be initiated.

Complaint can be made by email to: Mr. NK Jayaram (HR Dept)
Jayaram@anjanicement.com

Grievance Redressal Procedure

