



**SEXUAL HARASSMENT POLICY**  
(Prevention, Prohibition and Redressal)

(Amended as on 09.01.2026)

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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. This policy provides protection against sexual harassment of women at workplace and the prevention, prohibition and redressal of complaints of sexual harassment and matters related to it.

## **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. The policy was approved by the Board on September 29, 2014 and shall be effective immediately.

### **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. V.Valliammai, Presiding Officer  
Mr. S Hariharan, Group Company Secretary (M)  
Ms. Jamma Correa, Executive Assistant to Group CMD (W)  
Ms. Trayee Sinha, Vice President – Group Institutions (W)  
Mr. M Prabhu, DGM - Group HR (M)  
Ms. Ranjani Sivaraman, Retainer (W) – External Member

**\*Amended as on 30.03.2026**

#### **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. G Premkumar (HR Dept)  
premkumar.g@chettinadcement.

### **Filing Complaint by the Complainant**

The procedure for filing the Complaint are given below, subject to such amendments/modifications as per applicable laws

- An exclusive Email ID [posh.icc@chettinad.com](mailto:posh.icc@chettinad.com) has been created with access only to the ICC members.
- The Complainant shall address any sexual harassment complaints only to the ICC and not to talk or disclose information on the incident to anybody else except to persons permitted to make a complaint on behalf of the Aggrieved Woman as set out in this policy
- The complaint shall be submitted by the Complainant to the ICC in writing or shall be submitted to the ICC electronically at [posh.icc@chettinad.com](mailto:posh.icc@chettinad.com) . The complaint can also be physically submitted to any ICC member.
- The Complainant shall submit two copies of the Complaint to ICC and should include the name of the Respondent, details of the incidents (dates, times, locations, names and addresses of possible witness, what happened, supporting documents, response of the Complainant). In addition to the aforesaid, where possible, the Complainant should also forward a copy of the Complaint to [posh.icc@chettinad.com](mailto:posh.icc@chettinad.com)
- Indicative format for Complaint Form (Annexure A) , Reply of Respondent (Annexure B) and Statement of Witness (Annexure C) are annexed. These formats may be modified by the ICC, as may be necessary from time to time; subject to the provisions of the Act.
- A Non-Disclosure Undertaking (Annexure D) shall be signed by all individuals concerned with the Complaint; including the Complainant, the Respondent, Witnesses (if any) prior to commencing an inquiry. This format may be modified by the ICC, as may be necessary from time to time, subject to the provisions of the Act.
- A copy of the Complaint shall be sent to the Respondent by the ICC within two working days from the date of the receipt of the Complaint.

- The Respondent shall file the reply to the Complaint along with the list of documents and names and addresses of witnesses within a period not exceeding ten working days from the date of receipt of the Complaint.

#### **Complaint resolution procedure through Conciliation :**

Once the complaint is received by the ICC, before initiating an inquiry on the Complaint, ICC may at the request of the Complainant / Aggrieved Woman take steps to settle the matter between the Complainant/Aggrieved Woman and the Respondent through conciliation, provided that monetary settlement shall not be made a basis of conciliation

The ICC will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case. Resolution through conciliation is to happen fourteen days of receipt of the complaint, but no later than two weeks in any case.

In conducting the conciliation, a minimum of three ICC members including the Presiding Officer and one mandatory Nominated Member from the employer of the Aggrieved Woman and the Respondent are to be present.

It is the sole responsibility of the Head HR of the Employer of the Aggrieved Woman / Complainant / Respondent to provide all necessary assistance and support for conducting the Conciliation for the redressal of the Complaint.

In the event, the Complaint does not fall under the purview of Sexual Harassment or the Complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

If a settlement has been arrived in Conciliation Meeting, the ICC shall:

- Record the settlement and forward the same to the Employer to take action as specified in the recommendation; and
- Provide copies of the settlement as recorded to the Complainant and the Respondent and no further inquiry shall be conducted
- The indicative format of the settlement through conciliation is annexed as Annexure E, which may be modified by the ICC as may be necessary from time to time

#### **Complaint resolution procedure through formal Inquiry :**

The ICC shall initiate inquiry in the following cases:

- No conciliation is requested by the Complainant / Aggrieved Woman
- Conciliation has not resulted in any settlement

- Complainant informs the ICC that any term or condition of the settlement arrived through conciliation, has not been complied with by the Respondent

**Manner and Procedure of inquiry :**

- In conducting the Inquiry, a minimum of three ICC members including the Presiding Officer and one mandatory Nominated Member from the employer of the Aggrieved Woman and the Respondent are to be present..
- The ICC shall have the same powers as are vested in a Civil Court under the Code of Civil Procedure, 1908 namely summoning, enforcing the attendance of any person, examining on oath, requiring the discovery, production of documents and any other matter, which may be prescribed.
- The ICC is to make inquiry into the Complaint in accordance with the principles of natural justice and the provisions of the Act.
- No legal practitioner can represent any party at any stage of the inquiry procedure
- The ICC will hold an inquiry meeting with the Complainant and the Respondent within 21 days from the date of receipt of the Complaint, but no later than three weeks in any case.
- It is the sole responsibility of the Head HR of the Employer of the Aggrieved Woman / Complainant / Respondent to provide all necessary assistance and support for conducting the Inquiry and redressal of the Complaint.
- Where both the Complainant and the Respondent are employees, both the parties shall be given an opportunity of being heard
- At the first in the inquiry meeting, the ICC shall give the opportunity to hear the Complainant and record the allegations. The Complainant can also submit any corroborative evidence with a documentary proof, oral or written material, etc., to substantiate the complaint.
- The ICC shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Thereafter, the Respondent shall be given an opportunity to give an explanation, where after, an inquiry shall be conducted.
- The Complainant shall be provided with a copy of the explanation submitted by the Respondent.
- A copy of the findings shall be made available to both the parties enabling them to make representation against the findings before ICC
- If the Complainant/Respondent desires any witness/es to be called, they shall communicate in writing to the ICC the names of witness/es that they propose to call.
- The ICC shall call upon all witnesses mentioned by both the Complainant and the Respondent.



- The ICC shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- If the Complainant / Respondent desires to tender any documents by way of evidence before the ICC, the same to be submitted as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
- If the Complainant or Respondent desires to cross examine any witnesses, the ICC facilitates the same and records the statements. In case Complainant or Respondent seeks to ask questions to the other party, they may give them to the ICC which asks them and records the statement of the other party.
- The inquiry shall be concluded , including the submission of the Inquiry Report, within ninety days from the date of receipt of the complaint.

**Action during pendency of inquiry:**

During pendency of the inquiry, on a written request made by the Aggrieved Woman or the Complainant with the written request from the Aggrieved Woman, the ICC may recommend to the employer to:

- Transfer the aggrieved woman or the respondent to any other workplace; or
- Grant leave to the aggrieved woman up to a period of three months, in addition to the leave she would be otherwise entitled; or
- Grant such other relief to the aggrieved woman as may be appropriate

On the recommendation of the ICC, the Employer shall implement the recommendations and send the report of such implementation to the ICC.

**Termination of Inquiry :**

The ICC may terminate the inquiry or give ex-parte decision, if the Complainant or the Respondent is absent for 3 consecutive hearings, without any intimation to the ICC or sufficient reason. ICC to give, 15 days of written notice to the party, before termination of enquiry or ex-parte order.

**Inquiry Report :**

On the completion of the inquiry, the ICC shall provide a report of its findings to the Employer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

An indicative format of the Inquiry Report is annexed as Annexure F, which may be modified by the ICC as may be necessary from time to time.

**Complaint Unsubstantiated:**

- Where ICC arrives at a conclusion that the **allegation against the Respondent has not been proved**, it shall recommend the Employer that no action is required to be taken in the matter.

Further, the ICC ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged.

**Complaint Substantiated :**

- Where ICC arrives at a conclusion that the **allegation against the Respondent has been proved**, it shall recommend to the Employer, as the case may be-
  - to take disciplinary action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the Respondent or where no such service rules have been made, in such manner as may be prescribed and this may include:
    - Written Apology by the Respondent
    - Written Warning
    - Counseling
    - Censure or reprimand
    - Withholding of promotion and/or postponement or withholding or stoppage of increment
    - Suspension
    - Termination
    - Or any other action that the employer may deem fit.
  - to deduct, notwithstanding anything in the service rules applicable to the Respondent, from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with the provisions of the Act.

**Determination of Compensation :** For the purpose of determining the sums to be paid to the aggrieved woman, the ICC shall have regard to—

- (a) the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
- (b) the loss in the career opportunity due to the incident of sexual harassment;
- (c) medical expenses incurred by the victim for physical or psychiatric treatment;

- (d) the income and financial status of the respondent;
- (e) feasibility of such payment in lump sum or in instalments

In case, the Employer is unable to make such deduction from the salary of the Respondent due to his being absent from duty or cessation of employment it may direct to the Respondent to pay such sum to the aggrieved woman or to her legal heirs. Further, in case Respondent fails to pay such sums, ICC may forward the order for recovery of the sum as arrears of land revenue to the concerned District Officer.

The Employer is required to act upon the recommendations within 15 days from the date of receipt of the recommendation and confirm to the ICC. Post implementation of the actions, follow up with the Complainant should also occur to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

**Protection against Retaliation:**

Regardless of the outcome of the Complaint made in good faith, the Complainant / Aggrieved Woman and any person providing information or any witness, will be protected from any form of retaliation. While dealing with Complaint of sexual harassment, ICC shall ensure that the Complainant, Aggrieved Woman or the Witness(es) are not victimized or discriminated against by the Respondent. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the Respondent directly or indirectly against the Complainant / Aggrieved Woman should be reported by the Complainant / Aggrieved Woman to ICC as soon as possible. Disciplinary action will be taken by ICC against any such complaints which are found genuine.

**Punishment for false or malicious complaint and false evidence :**

Where the ICC, arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the Employer, to take action against the woman or the person who has made the complaint.

While deciding malicious intent, the ICC should consider that mere inability to substantiate a Complaint or provide adequate proof need not mean malicious intent and attract action against the Complainant. The malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

Where the ICC, arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Employer

of the witness, to take action in accordance with the provisions of the service rules applicable to the said witness or where no such service rules exist, in such manner as may be prescribed.

#### **Penal Consequences of Sexual Harassment :**

In case the ICC finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

#### **Appeal ;**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations, may prefer an appeal to the court or the tribunal in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist then, without prejudice to provisions contained in any other law for the time being in force, the person aggrieved may prefer an appeal in such manner as may be prescribed. The appeal shall be preferred within a period of ninety days of the recommendations.

#### **Confidentiality**

##### **Prohibition of publication or making known contents of complaint and inquiry proceedings.**

It shall be the duty of all the persons including ICC involved to ensure that notwithstanding anything contained in the Right to Information Act, 2005 (22 of 2005), the contents of the complaint, the identity & addresses of the aggrieved woman / complainant / respondent / witnesses, statements , evidence obtained in the course of inquiry process, recommendations of the ICC, action taken by the employer or any information relating to conciliation & inquiry proceedings are considered as confidential materials, shall not be published, communicated or made known to the public, press and media in any manner.

However, information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman, complainant, respondent and witnesses.

##### **Penalty for publication or making known contents of complaint and inquiry proceedings :**

Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken under the provisions of this Act, contravenes the aforesaid confidentiality clause, he/she shall be liable for penalty or subject to disciplinary

action in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed.

### **Duties of the Employer**

Subject to the provisions of the Act and Rules/applicable laws prevalent in the relevant jurisdiction, the duties of the Employer shall be as contained in Annexure G of the policy

### **Interpretation**

In all disputes regarding the interpretation of this policy only this English Text shall be considered as being authentic. Unless specifically stated to the contrary, masculine shall include feminine and vice versa wherever relevant.

### **Updating the Contents of this Policy (Additions, Deletions and Revisions)**

The provisions of this policy can be altered, added to, varied or substituted from time to time at the discretion of a competent authority as may be designated by the management of Chettinad Group

- **Approvals:** All additions, deletions modifications or revisions to this policy, require the written approval of the Chettinad Group CMD.
- **Responsibilities:** The Group HR is charged with the responsibility for ensuring that the review and implementation of policies, guidelines and procedures related to this policy are maintained and communicated to all employees.
- **Revisions:** Revisions shall be issued by appropriate documentation, which will permit rapid updating of the policy with a minimum of effort. Each revised notification will be numbered in sequence and show clearly the title to which it applies. Instructions for incorporating revisions into the policy will be contained in the notification. The revision will remain in effect until replaced by another formal revision. Policies, guidelines and procedures being replaced shall be identified.
- **Amendment:** The Group HR shall initiate action for releasing any amendment which may happen from time to time to amend this policy in accordance with the revisions or any amendment thereof. Any amendment so made shall apply to all employees.

In case, any of the questions are unanswered in this policy, employees are encouraged to raise any questions regarding this policy with Group HR, which will be answered and become part of FAQs till the release of next amendment of the policy.

## Grievance Redressal Procedure

