

SRU STELS LIMITED

SEXUAL HARASSMENT POLICY

SRU Steels Limited (hereinafter referred as "the Company") is committed to provide a safe environment for all its women employees at the workplace. The Company will operate a zero-tolerance policy for any form of sexual harassment at the workplace and treat all incidences seriously.

The main purpose to formulate this policy is to ensure safe working space for women and to build enabling work environments that respect women's right to equality of status and opportunity. Also, the sense of security at the workplace will improve women's participation in work, resulting in their economic empowerment and inclusive growth.

SCOPE:

This policy applies to all categories of women employed at the workplace of the Company, including regular, temporary, ad hoc or daily wages 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 the employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any such name;

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All sites away from the Company's premises where company-related activities are performed.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
4. 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.



MEANING OF SEXUAL HARASSMENT

Sexual Harassment includes one or more of the unwelcome behavior or acts (whether directly or by implication) namely Physical contact or advances; a demand or request for sexual favours; making sexually coloured remarks; showing pornography; any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Also, the following circumstances, among other circumstances, may constitute sexual harassment if it occurs or is present in relation or connected with any act or behaviour of sexual harassment:

- a. implied or explicit promise of preferential treatment in their employment;
- b. implied or explicit threat of detrimental treatment in their employment;
- c. implied or explicit threat about their present or future employment status;
- d. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- e. humiliating treatment likely to affect the health and safety of the aggrieved person.

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.

PREVENTION ACTION

The Company will take reasonable steps to ensure prevention of sexual harassment at work, which may include circulating applicable policy to all the employees of the Company, monitor emails and other electronic communications to scan for harassing content and creating awareness in respect of the consequences of such acts of harassment at the workplace.

INTERNAL COMPLAINT COMMITTEE

The Company shall constitute a Committee for ensuring the prevention of occurrence of any kind of sexual harassment (as defined above) and redressing of the complaints as may be raised from time to time by the women employees. This Committee shall be called as **Internal Complaint Committee** constituting the members in accordance with the following criteria:

- a) A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- b) Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.



- c) One member shall be from amongst Non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

It is hereby further stated that at least half of the total members of the Committee, so nominated shall be the women.

Other necessary preconditions of the Committee members

Complaints Committee/s members must be free of any conflict of interest with either the concerned parties or with the outcome.

Ensure that the independent third party member has sound knowledge, skill, and experience in dealing with workplace sexual harassment complaints.

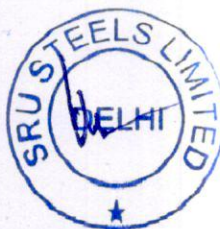
COMPLAINT REDRESSAL MECHANISM / PROCEDURE

Filing of a Complaint:

If any employee feels/believes that she has been sexually harassed at the workplace, in any manner, then she may raise the issue with or intimate about the same to any member of the Committee within three months of the incidence or if there are series of incidences, then within three months from the date of such last incidence. Here the Committee can extend the time period of 3 months if it is satisfied that the circumstances were preventing the aggrieved woman to file complaint, but this time can be extended to maximum 3 months only.

Also, the Complaint made shall be in writing, whether on a paper or by an e-mail but if the aggrieved women could not make it in writing then the members of the Committee shall have to make sure or shall have to assist the aggrieved woman for making the said complaint in writing.

And if any other person and / or employee who will be aware of the sexually harassed treatment of any women at the workplace then he / she may complaint about the same to any of the member of the Committee with the written consent of such aggrieved woman.



The complaint filed by aggrieved woman or the above mentioned other person should be comprising of the contents including but not limited to the date and time of the treatment causing sexually harassment, respondent's name and the relationship between the aggrieved and accused person(s):

Meeting of the Committee:

The concerned Committee member with whom the complaint would have been raised in the above said manner, then it would be his/her responsibility to arrange a meeting of the Committee within 2 to 3 days of receiving the Complaint. And if the members of the Committee would not be able to present physically in the meeting, then they have to manage to attend the meeting via video conferencing. In the meeting, if the members of the Committee considered necessary the presence of the complainant / aggrieved person, then they may ask such aggrieved person / complainant to be present at the scheduled meeting.

All concerns and issues raised under this policy shall be treated in a confidential manner. Similarly the identity of the complainant and subject of the investigation shall not be disclosed to any person, except investigators, for facilitation of the pertinent investigation, unless it becomes necessary to resolve the matter.

Resolution of the Complaint:

After discussing the issue / matter of the complaint in the scheduled meeting of the Committee, the Committee members may follow the any of the following procedure

- Formal Mechanism
- Informal Mechanism

The Committee in its meeting may opt any one of the above mechanism based on the loss / damage / harassment (emotionally / physically) caused to the aggrieved subject to the consent of such aggrieved employee.

In the informal mechanism, the committee members shall call upon the accused and address him in the manner including counselling, educating, orienting, or warning to promptly stop the unwelcome behaviour or appointing a neutral person to act as a conciliator between the parties to resolve the complaint through conciliation.



But if the nature of the complaint is serious which calls for formal redress, then the Committee members shall have to follow the following redressal mechanism:

1. Within two days of conducting the meeting, the Committee will inform the respondent in writing that a complaint has been received against him.
2. In case, the accused accept that he has committed the act of sexual harassment, then he would be punished in accordance with the Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.
3. But if the accused does not accept the commitment of sexual harassment act, then the committee will ask the aggrieved person / complainant to prepare a detailed statement of all the incidence allegations made by him/her against the Accused party.
4. Afterwards, the said statements shall be shared with the accused and he will be asked to submit a reply in response to the said statement of the allegations to the Committee with in the reasonable period of time as may be provided by the Committee to the accused person. The reply should be based on sound proofs and evidences which are to be provided along with the said reply.
5. The Committee shall ensure that both the parties will be given the chance to hear neutrally in the process of resolution of the complaint.
6. While a complaint is pending for inquiry, a complainant can make a written request for her transfer or the transfer of the respondent, or for leave (up to 3 months). She can also request the Internal Complaint Committee to restrain the respondent from reporting on her work performance. Even in the absence of such request by the aggrieved/complainant, the Internal Complaint Committee must take corrective action. It is essential to take these actions in order to prevent potential on going sexual harassment.
7. The Committee shall conduct an enquiry of the complaint filed against the accused by the complainant considering the witness and /or evidences provided by the accused and /or complainant



and /or the other parties. This enquiry shall be completed within 90 days from the date of filing the complaint.

8. The committee shall conduct its final meeting after obtaining the reply from the respondent, and shall take any of the following decisions:

- a) If after considering the reply of the accused person, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the concern will be dismissed and communication will be sent to the Victim, or
- b) If the allegation falls under the purview of Sexual Harassment the committee shall take disciplinary action against the accused person and / or any other person involved in such case.

Note: The meaning and scope of Sexual Harassment, Criteria for composition of the Internal Complaint Committee and the procedure to resolve the complaint of sexual harassment as prescribed under this policy are subject to the changes made under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules prescribed therein from time to time.

