

Transpek Industry Limited

Vadodara - 390021

Policy on Prevention of Sexual Harassment at Work Place:

Preamble:

Transpek is committed to provide opportunities to all employees for pursuing excellence in their professional endeavors. This would be possible only when each and every employee is assured of an atmosphere of mutual respect and equivalent opportunities. Transpek fully subscribes to the laws that forbid sexual harassment at work place and will not tolerate offensive, humiliating, coercive, intimidating or harassing behavior at our Company.

Objectives of the Policy:

The policy is framed considering following objectives:

- To promote and provide safe and congenial working environment.
- Create awareness about sexual harassment at work place.
- For prevention and protection against sexual harassment.
- To provide clear guideline about duties, responsibilities and rights of various persons covered in this policy.

Scope of the Policy:

This policy covers all employees, consultants, contract workers, temporary staff, trainees, applicants for employment with our Company and all persons we deal with in regular course of business.

Meaning of Sexual Harassment:

Sexual harassment can be one or series of occurrences where there is an unwelcome behavior of sexual nature or having sexual connotation in physical, verbal, non-verbal, written or graphical form. This includes unwelcome sexual advances, demand for sexual favours, making sexually colored remarks, showing offensive or derogatory videos, pictures, cartoons, saying, graphics, jokes, pamphlets or any kind of representation or gesture that makes other person feel sexually offended.

It also covers implied or explicit promise of preferential or detrimental treatment in the employment, implied or explicit threat about present or future employment status, interference with work or creating intimidating or offensive or hostile work environment, humiliating treatment likely to affect health and safety and an alleged act of sexual harassment committed outside office hours.

Internal Complaints Committee:

The formation of this committee is to prevent instances of sexual harassment and to resolve the complaints received in a time bound manner. One half of the total members of the Committee shall be females.

This Committee shall include:

- a. A women employed at a senior level in work place – Presiding Officer;
- b. Not less than two 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 from amongst non-government organization or associations committee to the cause of women or a person familiar with issues related to sexual harassment;

Every member of this committee shall hold office for such period, not exceeding three years, form the date of their nomination as may be specified by the employer.

Where the Presiding Officer or any Member of the Internal Committee:

- a. contravenes the provisions of section 16; or
- b. has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or
- c. he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- d. has so abused his/her position as to render his/her continuance in office prejudicial to the public interest; then

such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination.

Complaint Procedure:

The aggrieved person can make a complaint to any member of the committee in verbal or written manner within three months of occurrence of sexual harassment instance. The below mentioned guidelines shows procedure that needs to be followed for making such complaints.

- **Verbal Complaints:**

Aggrieved person may verbally complain regarding any instance of sexual harassment to any of the committee members. Such member shall inform other committee members regarding such instance in presence of aggrieved person.

- **Written Complaints:**

Aggrieved person may complain in writing, along with the supporting documents if any, regarding any instance of sexual harassment to any of the committee members. Where the aggrieved person is unable to make written complaint, all the reasonable assistance shall be provided to enable him/her to make such a complaint in writing. In case aggrieved person is not capable due to physical or mental incapacity or death or otherwise, legal heir or family may make a complaint in writing. Format given in **Annexure – I** may be followed for making such written complaint.

Disciplinary Actions:

- **Verbal Complaints:**

In case of verbal complaint, the members of the committee shall take steps to settle the matter between aggrieved person and respondent through conciliation. If the respondent does not comply with the conciliation agreed upon, aggrieved person at his/her own discretion may make a complaint in writing under this policy or make a complaint to management under other relevant rules and regulations of the Company.

- **Written Complaints:**

1. The Internal Complaints Committee shall examine and confirm that the reported instance can be construed as an act of Sexual Harassment.
2. After establishing this fact, Committee shall set an inquiry to collect all the required details and related documents.
3. The Committee shall call and record the explanation given by the respondent. Committee also has a right to question and examine the respondent and other person involved and compel them to produce any documents or other items with regards to such complaint.
4. On completion of inquiry if it is found that the respondent is guilty of such act of sexual harassment, the Internal Complaints Committee has a right to take corrective action which includes;

- a. Requiring respondent to give a formal apology to aggrieved person
 - b. Change of place of work and/or job role of the respondent
 - c. Change of place of work and/or job role of the aggrieved person with his/her consent
 - d. Suspension of termination of services of the respondent
 - e. Issuing Warning letter to respondent or to the Company of the respondent, in case respondent is not an employee of the Company.
 - f. Inform or complaint to appropriate Government Authority regarding such act of harassment with the consent of aggrieved person.
5. If the Complaint is not construed as Sexual Harassment or the respondent is not found guilty, the Presiding Officer, on behalf of the Internal Complaints Committee, shall inform the aggrieved person of such conclusion in writing with sufficient reasons.

Any conciliation or corrective action will never be made in form of a monetary settlement. The inquiry shall be completed withing a period of ninety days from the date of receipt of such complaint.

False Accusations:

If on conclusion of inquiry, it is established that the aggrieved person had indulged in making a false accusation with malafide intention to cause harm to the reputation of the respondent, the complainant would be subjected to same punishment that would have been given to the respondent in case of the respondent being guilty.

Informing the Internal Complaints Committee:

On receipt of any complaint by the Internal Complaints Committee, the Presiding Officer shall record the complaint in register, format given in **Annexure – I** and inform the other Committee members about the complaint so received and recorded.

Support to the Aggrieved Person:

The Company is committed to ensure that no employee who brings forward a complaint for sexual harassment shall be subject to any form of reprisal or discrimination or any other form of unprofessional behaviour.

During the pendency of any inquiry, the Internal Complaints Committee may recommend the company various measures, including those that are defined under applicable law, to support and assist the aggrieved person.

Related Documents and Reports:

Internal Complaints Committee shall maintain proper record of complaints received with details like date of complaint, name of the aggrieved person and alleged respondent, date of occurrence and details of harassment etc. as per the format given in **Annexure – I**.

The minutes of the meetings of the committees, the findings, recommendations, decisions of the committees and any document or any verbal communication shall be kept strictly confidential and the members shall not divulge the details to any other employee within the Company or to any person outside the organization.

The Annual Report in the prescribed format shall be submitted to the District officer.

Confidentiality:

The contents of the complaint, identity and addresses of the victim, respondent and witnesses, any information relating to inquiry proceedings, recommendations of the committee and the action taken by the Company are not to be made public, unless prescribed by the law for the time being in force. Also, it would not be shared to any other employees and the members should emphasize the necessity for confidentiality and the consequences of possible disciplinary action in case of violation.

The information may be disseminated regarding the justice administered to any victim of sexual harassment without disclosing his/her particulars.

Dissemination of the Policy:

For the purpose of creating awareness amongst the employees and the procedure that needs to be followed for making a complaint, document or procedure to be followed shall be displayed at all times in all offices and factories of the Company.

Policy shall be made available to all those covered under scope of this policy whenever required by them.

Amendments to the Policy:

Any amendment to the policy shall be subject to the approval of the Managing Director.

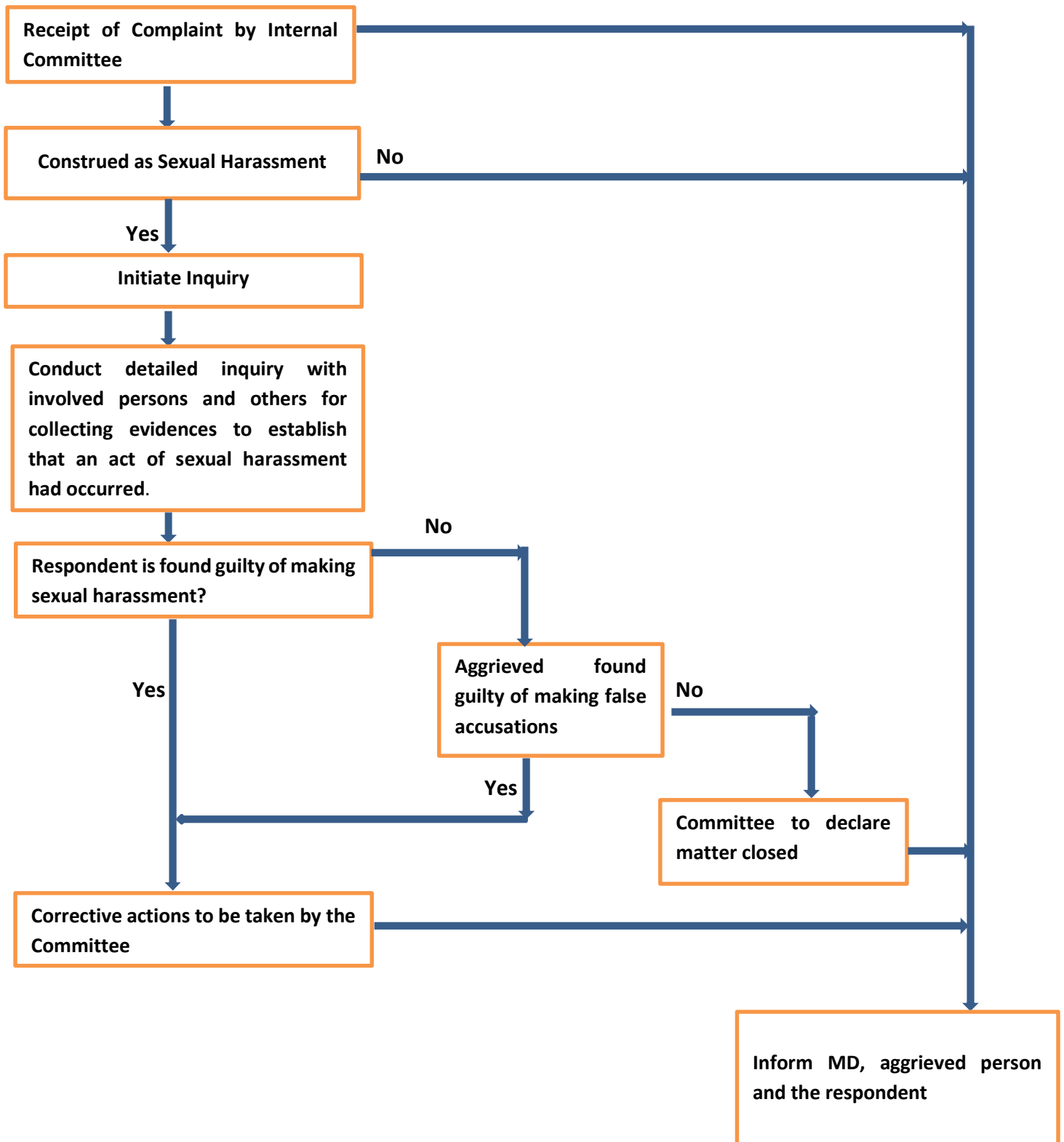
Conclusion:

The Company reiterates its commitment of providing its employees, a workplace free from harassment and discrimination, where every employee is treated with dignity and respect.

Annexure – I
Register of Complaints

Sr. No .	Date of the Complaint	Name of the Aggrieved Person	Nature of Complaint (Verbal/Written)	Name of the Alleged Person/Respondent	Brief Description of the Complaint	Date of the Incident

Annexure-II
Procedure Flow



Annexure – III
Members of Internal Complaints Committee

Ekalbara	Lilleria
Ms. Dhara Patel – Presiding Officer	Ms. Dhara Patel – Presiding Officer
Ms. Harsha Pandya – Employee of the Company	Mr. Pratik Shah – Employee of the Company
Mr. Roshan Bhavnani – Employee of the Company	Ms. Pinkal Shah – Employee of the Company
Ms. Smita Nawathe – Advocate	Ms. Archana Patel – Social Worker
Ms. Chandrika – Social Worker	Ms. Smita Nawathe - Advocate