



Doc No: OPGPG/CORP/POLICY/02

REV NO: 01 DATE 30/01/2025

Prevention of Sexual Harassment Policy

INTRODUCTION

This policy has been framed in accordance with the provisions of “**The Sexual harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**” and rules framed thereunder (hereinafter “the Act). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and provisions of the Act shall prevail.

Sexual Harassment means and includes any of the following:

- a) Unwelcome sexual advance, requests or demand for sexual favour, wither explicitly or implicitly, in return for employment promotion, examination or evaluation of a person towards any company activity;
- b) Unwelcomed sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone call, e -mail, WhatsApp, telegram, any social media platform, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal and non- verbal communication which offends the individual’s sensibilities and affect her performance;
- c) Eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy;
- d) Act or conduct by a person in authority which created the environment at workplace hostile or intimidating to a person belonging to the other sex;
- e) Conduct of such an act at workplace outside in relation to an employee, or vice versa during the course of employment; and
- f) Any unwelcome gesture by an employee having sexual overtones.



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Complaint Redressal Committee

- A. A committee has been constituted by the management to consider and redress complaints of sexual harassment. The Committee will meet once in every quarter irrespective of any complaint received

The members of the Committee are as below:

Ms. B Valentina - Senior Manager HR- Presiding Officer

Ms. B Sowmiya – Committee member

Ms. D Vinothini - Committee member

Ms. AG Lakshmi Sree - Committee member

Ms. Devika Thilak – External Committee member

Redressal Process:

- a) Any employee who feels aggrieved of being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the committee, in writing with her signature or through any other women within one year of the incident.
- b) If the aggrieved person is unable to lodge complaint in account of her capacity, the following may do so on her behalf, with her written consent.
 - a. Legal heir
 - b. Co-Worker
 - c. Any person having the knowledge of the incident
- c) The committee will endorse the complaint and keep the contents confidential.
- d) The committee will hold meeting within three days on receipt of the complaint.
- e) During the meeting, the committee members shall hear the complaint and record her allegations. The complaint can submit any proof to substantiate the claim.
- f) The committee shall make preliminary hearing with the person against whom the complaint is made and call for explanation. If not satisfied, an enquiry shall be conducted and closed.
- g) After enquiry, if the complaint does not fall under the purview of sexual harassment, the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons for the same.



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- h) In case of the complaint is found false and malafide in intent, the management may take appropriate action against the complainant.
- i) The Committee shall immediately proceed with enquiry and communicate the same to the complainant and person against whom complaint is made.
- j) Head-HR will communicate to the person against whom complaint is made and give him/her opportunity to submit a written explanation to the committee.
- k) If the complainant wants to submit any documents by way of evidence before the committee, she/he shall submit original copies of the documents.
- l) If the person against whom the complaint is made is willing to submit any document in evidence before the committee, he/ she shall produce original copies of such documents.
- m) All submitted documents shall be duly self-attested.
- n) The Committee shall call upon all witnesses mentioned by both the parties.
- o) The Committee shall complete the Enquiry within a period of one-month time and shall submit the finding along with any recommendations to the Head-HR.
- p) The entire redressal process should be completed within 90 days from the date of receiving the complaint.
- q) After the investigation, the ICC prepares a report with findings and recommends appropriate action to the employer, which could include disciplinary action against the accused.
- r) In certain cases, the ICC may facilitate a conciliation process where the parties try to reach a mutually agreeable resolution.
- s) Basis on the Submitted report, the Head-HR shall complete the due process for further action.
- t) Annual report summarizing complaints and Redressal of Sexual harassment shall be prepared and submitted on or before 31st January of the Financial year.
- u) Throughout the process, the ICC shall maintain confidentiality regarding the complainant's identity and details of the case.

C. Murugeswaran

Chief Operating Officer