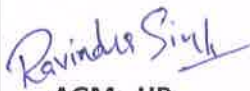






## POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN WORKPLACES

Release Date	New Policy /Revision	Prepared By	Reviewed By	Approved By
01-12-2023	New Policy	 AGM - HR	 CHRO	 CEO

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**1. PREAMBLE**

- 1.1 SAEL Industries Limited (hereinafter referred to as "SAEL Group", which expression shall, include its successors, Affiliates, sister concerns incorporated in India") is committed to creating a safe and healthy work environment that enables its Employees to work without fear of prejudice, gender bias and Sexual Harassment. The SAEL Group is committed to providing equal employment and career opportunities, without discrimination or harassment on the basis of race, colour, sex, age, disability, religion, region, marital status, ancestry, political belief or activity, genetic characteristics or any other category protected by law. The SAEL Group also believes that all its Employees have the human right to be treated with dignity. Any person who is involved in the acts of Sexual Harassment at the Workplace or in the course of official duties shall be considered a grave offence and shall be subject to appropriate disciplinary action.
- 1.2 The Supreme Court of India in its landmark judgement of 1997 in '***Vishaka and others vs. State of Rajasthan***', laid down guidelines making it obligatory for every employer and other responsible persons to provide a mechanism to redress grievances pertaining to workplace sexual harassment and evolve a specific policy to combat sexual harassment in the workplace and enforce the right to gender equality of working women.
- 1.3 The Government of India notified The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 ("**Act**") on prevention of sexual harassment against female employees at the workplace on December 9, 2013. The said Act provides protection against sexual harassment of women at the workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected therewith or incidental thereto. This Policy goes a step further and provides protection against sexual harassment to all Employees irrespective of gender and also provides a redressal mechanism for such matters and the Internal Complaints Committee shall have the discretion to address cases of special nature on a case-to-case basis to ensure protection and justice for all.
- 1.4 The Indian Penal Code 1860 ("**IPC**") prescribes punishment for offenses against women such as sexual harassment (354A), assault or use of criminal force (354B), voyeurism (354C), stalking (354D), rape (376), making gestures or sounds with an intent to insult the modesty of a woman (509) and other such offences. The punishments for such offences range from simple to rigorous imprisonment, for a term between one year up to life imprisonment.

1.5 With this background, the SAEL Group's Prevention of Sexual Harassment Policy ("**Policy**") has been formulated to create and maintain a safe working environment. This Policy seeks to:

- a. Encourage the Employees to play an active role in the prevention of Sexual Harassment at Workplace.
- b. Instil in Employees the understanding of creating a sexual harassment-free work environment.
- c. Discourage Employees from committing any form of Sexual Harassment.
- d. Assure all Employees that they can rely upon the organization's support in resolving their concerns related to Sexual Harassment in the Workplace.

1.6 This Policy is not intended to impair or limit the right of any Employee seeking a remedy available under law. Proceedings under this Policy shall continue notwithstanding any other proceedings initiated by an Employee against an alleged perpetrator, or any person involved in such an act under any other law in force.

1.7 The Policy is prepared and governed in consonance with SAEL Group's Code of Conduct and provisions of the Act.

## **2. PURPOSE:**

To create and maintain a safe work environment, free from Sexual Harassment & discrimination for all its Employees.

## **3. SCOPE:**

This Policy shall be applicable to all Employees of the SAEL Group.

## **4. DEFINITIONS:**

For the purpose of the Policy the following terms have been defined-

**"Act"** means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

**"Aggrieved Individual"** means in relation to a Workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.

For instance, a visitor, a guest, a customer, an employee of an affiliate etc. shall also be qualified as being an Aggrieved Individual.

**“Committee”** shall have the meaning as ascribed to it in Article 5 of the Policy.

**“Complainant”** is any Aggrieved Individual (or if the Aggrieved Individual is unable to make a Complaint on account of his/her physical or mental incapacity or death or otherwise, any other person permitted under the Act) who makes a Complaint alleging Sexual Harassment under this Policy.

**“Employee”** Employee means a person employed by the SAEL Group, for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, consultant, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, intern, trainee, apprentice or called by any other such name.

**“Employer”** shall mean the Managing Director of the SAEL Group.

**“Policy”**- shall mean Prevention of Sexual Harassment Policy of the SAEL Group

**“Respondent”**- The person against whom a complaint of Sexual Harassment has been made.

**“Sexual Harassment”**- Sexual Harassment at the Workplace means and includes but is not limited to inter-alia:

- a. unwelcome sexual advances (verbal, written or physical) implicit or explicit.
- b. a demand or request for sexual favours.
- c. Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation.
- d. any other type of conduct of sexual nature including but not limited to sexually coloured remarks including but not limited to vulgar / indecent jokes, gestures, letters, phone calls, WhatsApp/text messages, e-mails, etc.
- e. Showing pornography or the likes.
- f. verbal abuse or sexual “jokes”.

- g. Teasing, innuendos and taunts, physical confinement and /or touching against one's will and likely to intrude upon one's privacy.
- h. Verbal or non-verbal communication, any conduct of sexual nature which offends the individual's sensibilities and that has the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.
- i. The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:
- Implied or explicit promise of preferential treatment in the employment.
  - Implied or explicit threat or detrimental treatment in the employment.
  - Implied or explicit threat about the present or future employment status.
  - Interference with the work or creating an intimidating or hostile work environment.
  - Humiliating treatment likely to affect health or safety.

The point of consideration should be the effect or impact that the conduct of one person has on another rather than whether the behaviour was intentionally offensive or not. Further, not only face to face harassment, but Sexual Harassment by electronic means, such as by the use of public or private social media as well shall constitute Sexual Harassment. Sexual Harassment does not have to be repeated or continuous to be against the Policy, even a single such act shall amount to sexual harassment and is liable to be actionable under this Policy.

The following behaviour is indicative of the behaviours that is considered inappropriate within the SAEL Group working environment and is liable for disciplinary action:

**Verbal harassment**

- a) A demand or request for sexual favours.
- b) Comments about a person's sex or private life.
- c) Sexually coloured remarks.

**Physical harassment**

- a) Offensive gestures.
- b) Touching in a sexual manner.
- c) Assault or coerced sexual acts.

**Written or graphic harassment**

- a) Unsolicited forwarding of pornographic pictures or videos/ clips/ memes etc. through email, or any other medium.
- b) The display of sexually suggestive objects, pictures, magazines, posters or cartoons in the work-area.
- c) Written communication that has sexual implications.

**Emotional harassment**

- a) Demanding sexual favours in return for or with a promise of favourable performance appraisals, promotions, sustained employment and provision of employment.
- b) Implied or explicit detrimental treatment for refusal to provide sexual favours.
- c) Interference with the work or creating an intimidating or offensive or hostile work environment.
- d) Humiliating treatment likely to affect health or safety.

**Third Party Harassment**

As per the Act, if Third Party Harassment occurs as a result of an act or omission by any third party or outsider, the SAEL Group will take necessary and reasonable steps, as per law, to assist the affected person in terms of support and preventive action including assisting an Employee who wishes to file a complaint with the local police.

**“Workplace” means and includes:**

- a. Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the SAEL Group.
- b. All of the SAEL Group-related activities performed at any other place away from the SAEL Group's premises.
- c. Any social, business or other gathering whether within or outside SAEL Group workplaces.
- d. Places visited by Employees arising out of or during the course of employment including transportation whether or not provided by the SAEL Group for undertaking such journey.
- e. Any misbehaviour in the nature of Sexual Harassment on any public or private social networking platform shall also be considered Sexual Harassment at Workplace irrespective of whether such sexual behaviour was shown during or outside of office hours.

**5. CONSTITUTION, COMPOSITION, POWERS OF THE INTERNAL COMPLAINTS COMMITTEE:**

5.1 The SAEL Group shall constitute an "Internal Complaints Committee" at the Workplace.

5.2 The Internal Complaints Committee shall consist of the following members:

- a. Presiding Officer who shall be a woman employed at a senior level at Workplace.
- 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-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment or a person who is familiar with labour, service, civil or criminal law.

5.3 At least one-half of the total Members so nominated shall be women.

5.4 The Presiding Officer and every Member of the Internal Complaints Committee shall hold office for a period up to three years, from the date of their nomination and may be reappointed at the discretion of the Management.

5.5 Internal Complaints Committees have been formulated for all applicable sites. While the Internal Complaints Committee at corporate level will handle all Complaints received in New Delhi, 2 representatives from the applicable sites will be co-opted into the Internal Complaints Committee to cover the respective sites of SAEL Group.

5.6 For Internal Complaints Committee constitution at the subsidiaries/ associate companies/ sister concerns, 2 members will be co-opted from the respective companies to form the respective Internal Complaints Committees.

5.7 The co-opted members would participate in any investigations / POSH related initiatives that are required to be conducted in their respective sites/ companies. All other sites/ companies where co-option is not possible, will be governed by the Internal Complaints Committee established at corporate level at New Delhi.

5.8 In accordance with Section 11(3) of the Act the Committee shall have such powers that are vested in a civil court under the Court of Civil Procedure, 1908 while trying a suit, i.e., in respect of summoning and enforcing attendance of any persons and examining a person under an oath; requiring the discovery and production of documents and any other matter that may be prescribed.

5.9 A quorum of three members is required to be present for the proceedings to be conducted in the Committee. The Quorum shall include the Presiding officer, at least two members, out of which one Member shall be a woman. No person who is a Complainant, witness, or defendant in the complaint against Sexual Harassment shall be a member of a Committee. Any Committee member charged with Sexual Harassment in a written complaint must step down as a member during the inquiry into that complaint.

The details about the current members of the Internal Complaints Committee and nominations from various sites and companies are enclosed in **Annexure A**.

## **6. PROCEDURE TO REGISTER COMPLAINTS**

6.1. Upon any violation of the Policy, a written complaint can be submitted to any member of the Committee (mentioned hereinafter) within 3 months of occurrence of an act of Sexual Harassment and in case of series of events of Sexual Harassment then 3 months from the occurrence of the last incident. However, where such Complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaints Committee, as the case may be, shall render all reasonable assistance to the Aggrieved Individual for making the Complaint in writing. The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Aggrieved Individual from filing a Complaint within the said period. The Complaint may also be filed via email at the following email address [icposh@sael.co](mailto:icposh@sael.co)

6.2. Such complaint has to be submitted by the Complainant. However, if the Complainant is unable to do so, we are providing herein below, some of the rights available to a Complainant for approaching the Committee in respect of a Complaint under this Policy:

6.2.1. In case of physical incapacity, a Complaint may be filed by the relative, friend, co-worker, or an officer of the National Commission for Women or State Women's Commission or any



person who has knowledge of the incident, with the written consent of the woman Complainant.

6.2.2. In case of mental incapacity, a Complaint may be filed by the relative or friend, a special educator, a qualified psychiatrist or psychologist, the guardian or authority under whose care she is receiving treatment or care; or any person who has knowledge of the incident jointly with her/his relative or friend or a special educator or qualified psychiatrist or psychologist or guardian or authority under whose care she is receiving treatment or care.

6.2.3. In case of death of the Complainant, a Complaint may be filed by any person who has knowledge of the incident with the written consent of the legal heir of the woman Complainant.

6.2.4. Where the Complainant is unable to make a Complaint for any other reason, a Complaint may be filed by any person who has knowledge of the incident with the written consent of the Complainant.

6.3. Upon receipt of any such Complaint, the Committee shall conduct an inquiry in accordance with the provisions stated in Article 7 and 8 of this Policy.

## **7. CONCILIATION**

7.1 The Internal Complaints Committee may, before initiating an inquiry and at the request of the Aggrieved Individual, take steps to settle the matter between the Aggrieved Individual and the Respondent through conciliation. It should be noted that no monetary settlement shall be made as a basis of conciliation.

7.2 Where a settlement has been arrived, the Internal Complaints Committee shall record the settlement so arrived and forward the same to the Employer to take action as specified in the recommendation and no further inquiry shall be conducted by the Internal Complaints Committee.

7.3 The Internal Complaints Committee shall provide the copies of the settlement to the Aggrieved Individual and the Respondent.

**8. MANNER OF INQUIRY**

- 8.1 On receipt of the Complaint, the Internal Complaints Committee shall send one of the copies received from the Aggrieved Individual to the Respondent within a period of seven (7) working days. The Complainant shall submit to the Internal Complaints Committee, six (6) copies of the Complaint along with supporting documents and the names and addresses of the witnesses.
- 8.2 The Respondent shall file his reply to the Complaint along with list of documents, and names and addresses of witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of the documents.
- 8.3 The Internal Complaints Committee shall make an inquiry into the Complaint in accordance with the principles of natural justice.
- 8.4 The Internal Complaints Committee shall conduct a fair and impartial inquiry and have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.
- 8.5 The Internal Complaints Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the Complaint, if the Complainant or Respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Presiding Officer. Such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.
- 8.6 The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- 8.7 At the discretion of the Internal Complaints Committee and with the consent of the concerned Complainant/ Respondent/ witness any or all Proceedings may be recorded by audio/ video mode. In case of refusal by concerned Complainant/ Respondent/ witness for such recording the relevant Proceeding may be undertaken in a manner that minutes are taken down simultaneously during such Proceeding.

8.8 The inquiry will be completed by the Internal Complaints Committee within 90 days.

8.9 If the Complainant or Respondent desires to cross examine any witnesses, the Internal Complaints Committee will facilitate the same and record the statements. In case Complainant or Respondent seeks to ask questions to the other party, they may give them to the Internal Complaints Committee which will ask them and records the statement of the other party.

## **9. ACTION DURING PENDENCY OF INQUIRY**

9.1 During the pendency of the proceedings, the Committee has the power to recommend to the SAEL Group, certain interim reliefs for the Complainant, at her/his request, such as –

- a. change in reporting structure if the Respondent is direct supervisor of the Complainant, or person influencing the career growth of the Complainant;
- b. grant leave up to three months. The leave granted to the Aggrieved Individual shall be in addition to the leave he/she would be otherwise entitled.
- c. transfer to another Workplace;
- d. or any other such relief.

9.2 On the recommendation of the Internal Complaints Committee, the Employer shall implement the recommendations made above and send the report of such implementation to the Internal Complaints Committee.

9.3 The Internal Complaints Committee at the written request of the Aggrieved Individual may recommend to the Employer to restrain the Respondent from reporting on the work performance of the Aggrieved Individual or writing her/ his confidential report, and the SAEL Group may assign the same to another Employee/ official.

## **10. CONFIDENTIALITY:**

10.1 The inquiry proceedings shall be conducted in a confidential manner, all members of the Committee, witnesses, Complainant and Respondent are required to maintain strict confidentiality. All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

10.2 Any disclosure, publication, dissemination of any information or material relating to an incident or inquiry of Sexual Harassment shall be treated as misconduct and accordingly action shall be taken against such person.

10.3 To protect the interests of the Complainant and the accused person, confidentiality will be maintained throughout the investigatory process to the extent practicable, appropriate, and legally permitted under the circumstances. The identity and the addresses of the Complainant, Respondent and witnesses and the action taken by the Company shall not be published or communicated to public, press and media in any manner, unless required by applicable law to do so.

10.4 Notwithstanding anything contained in the Right to Information Act, 2005, (22 of 2005) the contents of the Complaint, the identity and addresses of the Aggrieved Individual, Respondent and witnesses, any information relating to Conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee and the action taken by the Employer shall not be published, communicated or made known to the public, press and media in any manner. However, the information may be disseminated regarding the justice secured to any Complainant of Sexual Harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Aggrieved Individual and witnesses.

10.5 Contravening the provisions of this Article shall lead to penalty as per law.

## **11 INQUIRY REPORT**

11.1 On the completion of an inquiry, the Internal Complaints Committee 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 shall be made available to the concerned parties.

11.2 Where the Internal Complaints Committee arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.

11.3 Where the Internal Complaints Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the employer:

11.3.1 to take action for Sexual Harassment as a misconduct under the service rules and it shall recommend to the Employer to take any action including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the respondent from service or undergoing a counselling session or carrying out community service;

11.3.2 to deduct from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Individual or to his/her legal heirs, as it may determine, in accordance with the provisions of Article 13. 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 Individual. Provided further that in case the Respondent fails to pay the sum referred to above, the Internal Complaints Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

11.4 The Employer shall act upon the recommendations of the Internal Complaints Committee within 60 (sixty) days of receipt of such recommendations.

11.5 In case the conduct of the Respondent amounts to a specific offence under the Indian Penal Code, 1860, the SAEL Group will aid the Complainant if he/she decides to report to the police.

## **12. FALSE OR MALICIOUS COMPLAINT AND/OR FALSE EVIDENCE:**

12.1 Where the Internal Complaints Committee arrives at a conclusion that the allegation against the Respondent is malicious or the Aggrieved Individual or any other person making the Complaint has made the Complaint knowing it to be false or the Aggrieved Individual 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 Aggrieved Individual or the person who has made the Complaint under Article 6 in accordance with the provisions of the service rules applicable to employees. However, a mere inability to substantiate a Complaint or provide adequate proof need not attract action against the Complainant. The malicious intent on part of the Complainant shall be established after an inquiry before any action is recommended.

12.2 Where the Internal Complaints Committee 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 Article 11.

## **13. DETERMINATION OF COMPENSATION**

While determining the sums to be paid to the Aggrieved Individual under Article XI, the Internal Complaints Committee shall keep in mind the following:

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- 13.1 the mental trauma, pain, suffering and emotional distress caused to the aggrieved individual;
- 13.2 the loss in the career opportunity due to the incident of Sexual Harassment;
- 13.3 medical expenses incurred by the Aggrieved Individual for physical or psychiatric treatment/ counselling/ therapy;
- 13.4 the income and financial status of the Respondent;
- 13.5 feasibility of such payment in lump sum or in instalments.

**14. ANNUAL REPORT:**

The Committee shall prepare an annual report and submit the same to the SAEL Group. The annual report shall consist of the following details:

- a. Number of complaints of Sexual Harassment received in the year;
- b. Number of complaints disposed off during the year;
- c. Number of cases pending for more than ninety days;
- d. Number of workshops or awareness programme against Sexual Harassment carried out; and
- e. Nature of action taken by the Company.

**15. DUTIES OF THE SAEL GROUP**

The SAEL Group shall –

- a. provide a safe working environment to all its Employees;
- b. ensure that concerns about Sexual Harassment don't become an excuse for discrimination;
- c. constitute the "Internal Committee" as per this Policy and display at any conspicuous places in the Workplace as well as upload on its website, details regarding the members of these committees with their contact numbers;
- d. make public the details of members of the Internal Complaints Committee at the head office;
- e. ensure publicity and circulation of the present Policy in all offices/branches/project locations of the SAEL Group;
- f. develop and display information and communication materials on the present policy and its provisions in a simple and local language, particularly highlighting what constitutes Sexual Harassment at Workplace, who can file a Complaint and how, the mechanism for grievance redressal, and action that may be taken if Sexual Harassment at Workplace is determined;
- g. organize workshops and awareness programmes at regular intervals for sensitizing Employees on the provisions of the Policy as also existing laws for protection of women and children as well as all Employees;

- h. organise training and sensitisation programmes for all members of the Internal Complaints Committee.
- i. provide necessary facilities and resources, including secretarial assistance to the Internal Complaints Committee under the present policy for dealing with the Complaint and conducting an inquiry;
- j. assist in securing the attendance of Respondent and witnesses before Internal Complaints Committee, as the case may be;
- k. make available any such information to the Internal Complaints Committee as it may require during the course of the inquiry;
- l. provide services of translators, interpreters, special educators, support persons and such other experts as may be called for by the Internal Complaints Committee for the purposes of inquiry;
- m. aid the Complainant if she/he chooses to file a criminal Complaint against the Respondent and a recommendation is made in this regard by the Internal Complaints Committee;
- n. cause to initiate action under the Indian Penal Code and/or any other law for the time being in force if the aggrieved person so desires and a recommendation is made by the Internal Complaints Committee in this regard, and where the perpetrator is not an Employee, partner or associate in the Workplace at which the incident of Sexual Harassment took place;
- o. treat Sexual Harassment as misconduct under the service rules and disciplinary policy of the SAEL Group and initiate action for such misconduct;
- p. monitor the timely submission of reports by the Internal Complaints Committee to the SAEL Group;

## 16. DUTIES OF EMPLOYEES

All Employees must understand that an allegation of Sexual Harassment is of a grave nature that will be taken up seriously and not tolerated. In addition to the Code of Conduct applicable to all Employees, the following must guide their actions and behaviour at all times: Employees are encouraged to:

- a. Know the SAEL Group's Policy on Prevention Of Sexual Harassment as it may be commonly referred to.
- b. Familiarise yourself with the provisions of various laws for protection of women and children and your rights and responsibilities under the civil and criminal laws applicable to all citizens.
- c. Be alert and ready to help if a person is seeking help.
- d. Be aware of one's own behaviour, particularly what may be perceived as inappropriate to a reasonable mind and avoid the same.
- e. Be aware of cultural sensitivities.

- f. Learn and internalise that it is wrong to assume that some people, particularly some women like being 'teased' and their "silence" or "no" means a "yes".
- g. Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable.
- h. Trust your instincts. Walk away from uncomfortable situations.
- i. Say "NO" to offensive behaviour as soon as it occurs.
- j. Learn to report and encourage reporting as a norm.
- k. Understand that the way an individual dresses up does not make them deserve Sexual Harassment.
- l. Understand that harassing women is not a proof of masculinity and make the same known to your colleagues, friends and family.
- m. Remember that an unwanted and abusive display of power can undermine the self-confidence of a person and make them feel angry and resentful.
- n. Maintain confidentiality regarding any aspect of an inquiry to which they or a co-worker may be party to.

Employees are encouraged not to:

- o. Indulge in or encourage any form of Verbal harassment, Physical harassment, Written or graphic harassment, Emotional harassment or Third Party harassment.
- p. Take discriminatory actions or decisions which are contrary to the spirit of this Policy.
- q. Trivialize sexual harassment as a light-hearted joke or teasing.
- r. Make false Complaints or misuse the Policy.

## **17. AMENDMENTS**

The SAEL Group reserves the right to amend the Policy as per the prevailing laws in order to comply with any laws/rules/regulations that come into effect from time to time.

## **18. AWARENESS**

All Employees will be made aware of this policy by circulating this policy. A copy of this policy will be given to all new Employees on joining. This Policy will also be posted on website for ready reference of all Employees



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**POSH POLICY****ANNEXURE A****INTERNAL Complaints COMMITTEE**

- a. Ms. Supreet Gupta (Presiding Officer of the Committee & CHRO)
- b. Mr. Ambuj Mishra (Head- ESG)
- c. Ms. Maulishree Gupta (Senior Manager, Legal)
- d. Lady Member to be announced (an NGO worker, a psychologist, or a lawyer)