



ASM Technologies Limited

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

OBJECTIVE

This Policy has been formulated keeping in view the provisions under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its Rules. The said policy is to however define the guidelines and the procedures to be followed in order to provide protection against sexual harassment of women employees at workplace and for the prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto.

COMMITMENT

Our Company is committed to provide a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity. The company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

SCOPE

This policy applies to all categories of women employees of the company, including permanent, temporaries, trainees and employees on contract at its workplace or at client sites. The company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes-

All offices or other premises where the Company's business is conducted.

All company-related activities performed at any other site away from the Company's premises.

Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Definition of Sexual Harassment:

"Sexual Harassment" would mean and include any of the following:

Unwelcome sexual advances or gestures having sexual overtones, requests or demand for sexual favours either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity or without any reason whatsoever.

Sexual advances verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing pornography, lurid stares, physical contact or

molestation, stalking, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and using offensive language that insults , demeans or derogatory to a women colleague.

Eve teasing, innuendos and taunts, physical confinement against one`s will and likely to intrude upon one`s privacy.

Internal Complaints Committee (ICC):

The company has constituted an Internal Complaints Committee for time-bound redressal of sexual harassment complaint(made by the victim).

In accordance with the sexual Harassment of Women at Workplace(Prevention, Prohibition and Redressal) Act 2013, the Internal Complaints Committee will comprise of the following and atleast half of them women:

1. Chairperson- Shall be a woman employed at senior level at workplace from amongst the employees.
2. Two Members- shall be amongst employees , preferably sensitive to issue related to women.
3. One member-shall be from amongst Non-Governmental Organisation/association committed to the cause of women.

Every member of the Internal Complaint Committee shall hold office for a period of three years from their date of nomination and thereafter a renewal permissible for period of not exceeding three years.

The Internal Complaints Committee is responsible for-

- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Investigating every formal written complaint of sexual harassment
- Discouraging and preventing employment –related sexual harassment.

Procedure of Resolution of Complaints

1.Any employee with a harassment concern, who has exhausted with the informal resolution options may make a formal complaint to Chairperson of the ICC. The complaint shall be in writing in the form of a letter along with supporting documents if any and the names and addresses of the witnesses, in a sealed envelope, preferably to be submitted within three months from the date of occurrence of the alleged incident.

2.The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential.

3.The Committee will hold a meeting not later than a week of receipt of complaint and will first evaluate if there is a prima facie case or not.

4. At the first meeting the Committee members shall hear the allegations of the complainant. Thereafter the person against whom complaint is made (respondent) may be given an opportunity to be heard.

5. The Committee has 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 3 consecutive hearings convened by the chairperson. In conducting the inquiry a minimum of three members of the Complaints Committee including the chairperson, as the case may be, shall be present.

6. The Committee shall thereafter proceed with the Enquiry and hand over the statement of allegations to the respondent, giving him/her an opportunity to submit written explanation. A copy of the same shall be forwarded to the complainant. If the complainant or respondent so desire they may present their witnesses and also documentary evidences to support their claims.

7. The Committee shall conduct investigations in a timely manner, providing every reasonable opportunity to both the complainant and respondent to be heard and shall submit a written report containing the findings and recommendations to the Employer, not later than 10 days of completion of inquiry.

8. If the Committee arrives at a conclusion that the allegation against the respondent is true it shall recommend to the employer to take action which may include-

- Warning
- Written apology
- Withholding Promotion/increments
- Terminating the respondent from service.

9. If however, the complaint is false or does not mean an offence of Sexual harassment the same would be dropped after recording the reasons thereof.

10. To protect the interests of the complainant, respondent and witnesses, confidentiality will be maintained throughout the investigatory process to the extent practical under the circumstances. All records of complaints, including that of meetings and results of investigations will be kept confidential by the company except where disclosure is essential.

In conclusion, the Company reiterates its commitment to providing women employees a workplace free from sexual harassment /discrimination.

