



URJA GLOBAL LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

1. INTRODUCTION

Urja Global Limited (“Company”) is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

The Company is committed to adopting procedures to receive and address any concern or complaint regarding questionable accounting or auditing matters, internal controls, disclosure matters, reporting of fraudulent practices, employee misconduct, health, safety and environmental issues which cannot be resolved through normal management channels.

2. OBJECTIVE / PURPOSE:

This policy has been framed with a view to:

- Promote a workplace based on equality & respect.
- Provide a safe and congenial work environment.
- Awareness & sensitization about sexual harassment at the workplace.
- Prevent sexual harassment.
- Provide formal and informal mechanism for redressal in case of complaint of sexual Harassment at the workplace.
- Define the implications and outcome of sexual harassment.
- Ensure protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

3. SCOPE

This policy applies to all categories of employees including permanent management and workmen, temporaries, trainees and employees on contract at its workplace as well as any other premises used by its employees during the course of their employment.

4. DEFINITIONS:

Sexual Harassment:

Sexual harassment includes such unwelcome sexually determined behavior (whether direct or

by implication) such as:

- a. Physical contact and sexual advances;
- b. Demand or request for sexual favors;
- c. Sexually - colored remarks;
- d. Showing pornography; and
- e. Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

5. INTERNAL COMPLAINTS COMMITTEE:

1. Chairperson - Shall be a woman employed at a senior level at workplace amongst the employees.
2. Two members- Shall be amongst employees preferably committed to the cause of woman or a person familiar with the issues relating to sexual harassment.
3. One Member - amongst Non-Governmental Organisations or associations committed to cause of woman.

The committee shall comprise of the following persons:

- (a) Ms Chitra Joshi, Presiding Officer
- (b) Ms. Ruchi Jain, Member
- (c) Ms. Richa, Member
- (d) Ms. Mita Sinha, NGO Member

The constitution and operation of the Internal Committee shall be in accordance with the Act and the Sexual Harassment of Women (Prevention, Prohibition, and Redressal) Rules ("Rules") framed thereunder.

The Internal Committee shall be required to submit annual Reports as per clause 20 of the Rules

6. POWERS AND FUNCTIONS OF THE COMMITTEE

To implement the guidelines framed by the Company, the committee shall have the following powers and functions:

1. To receive complaints of sexual harassment, in writing, from the aggrieved employee,
2. To process individual grievances concerning sexual harassment in the departments/administration,
3. To make inquiry into the written complaint of sexual harassment in accordance with the principles of natural justice in such manner as prescribed in the Rules,
4. To investigate into the matter thoroughly,
5. To Recommend suitable action in the manner and mode provided in the guidelines,
6. To provide a report of its findings with recommendations to the President within the time frame stipulated under the Act,
7. And to do all such acts and things as may be necessary to carry out the objectives of these directions.

7. ACTS AMOUNTING TO SEXUAL HARASSMENT AT WORKPLACE

- Implied or overt promise of preferential treatment in employment; or
- Implied or overt threat of detrimental treatment in employment; or
- Implied or overt threat about present or future employment status; or
- Conduct of any person which interferes with work; or
- Creates an intimidating or offensive or hostile work environment; or
- Humiliating conduct constituting health and safety problems.

8. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

THE PREVENTIVE / INFORMAL PROCESS THAT CAN BE ADOPTED IS AS FOLLOWS:

1. Convey to the person who is the cause of distress, about what that person's actions, words, behavior is doing and convey in no uncertain terms that such behavior is not appreciated. **What is important is the "Way" a particular behavior, action or word is perceived; "Intent" is of no consequence.**
2. The second step would be to approach someone within the company – preferably your Superior or HR Representative. **The Superior or HR Representative would then try and counsel / talk it over with a view towards closing the matter amicably.**

3. In any case all such incidents along with the resolution, needs to be reported to the Head of HR who will then provide a short report to the Internal Complaints Committee and the matter will be closed.
4. However, in the event of it not being resolved, then it would need to be escalated to the Internal Complaints Committee.

THE FORMAL PROCESS THAT CAN BE ADOPTED IS AS FOLLOWS:

In the event of the complaint not being resolved through informal mechanism, then it would need to be escalated to the Internal Complaint Committee for redressal:

1. The aggrieved woman may make, in writing, a complaint of sexual harassment at the workplace to the Internal Committee, within a period of three months from the date of incident and in case of a series of incidents, **within a period of three months** from the date of the last incident. The complaint can also be routed through the women representatives at respective locations. The Internal Complaints Committee will render reasonable assistance to women for making the complaints in writing. This time limit may **further be extended for 3 months** if the complaints committee is satisfied that there were circumstances that prevented the woman from filing a complaint within the specified timeline.
2. A member of the Internal Complaint Committee would then hold an investigation and **give a report to the Internal Complaint Committee.**
3. The Committee, before initiating the inquiry at the request of the aggrieved woman, will take steps to settle the matter between her and the respondent through **mutual settlement. Wherever such settlement has been arrived, the internal committee shall record it and send the same to the HR to take action as per recommendation.**
4. The Committee, while investigating the complaint referred to it, **will call upon both the parties separately, listen, look at proof (if any), verify documents produced by the parties, allow the parties to produce witnesses and to put forth their say.** Both the parties during the course of enquiry are given an opportunity of being heard.
5. At the end of the investigation, the Member of the Committee shall prepare a report of findings on the complaint and submit it to the Chairperson of the Committee. The findings of the report should be made available to the respondent and aggrieved woman within 10 working days from the date of completion of enquiry.

6. The Chairperson of the Committee shall ensure that the complaint is attended to within 10 working days after receiving it and **that the investigations are completed within 30 working days.**
7. The Chairperson after studying the report & discussion with the Committee members shall submit her recommendation to the HR, within 10 days of completing the inquiry.
8. The implementation of the recommendation of Internal Complaint Committee by HR, **should be done within 30 days of receipt of such recommendation.**

9. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

10. ACCESS TO REPORTS AND DOCUMENTS

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.

11. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

12. INFORMATION

The Company will make all efforts to communicate this policy all employees at all locations in the country. This policy shall become an integral part of the Policy of the Company.
