

EUREKA INDUSTRIES LIMITED

Policy on Sexual Harassment Policy at Workplace

Effective From 01st April, 2017

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

The Board of Directors of Eureka Industries Limited (“the Company”) is required to formulate the policy for “Preservation of Documents” to comply the provision under The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as SHWW Act) and its Rules.

DEFINITIONS:

In this Policy document, unless there is anything repugnant to the subject or context thereof, the words and expressions as stated below shall have the following meanings:-

“Complainant Employee”: Refers to any woman employee (as per section 2(a) of SHWW Act) who has lodged a complaint of sexual harassment at workplace and has been subjected to any act of sexual harassment by another employee (hereinafter referred to as respondent’).

“ICC”: Internal Complaints Committee means the Internal Complaints Committee constituted by the company in accordance with the provisions of the Act for redressal of a Complaint.

“Respondent Employee”: Refers to any employee against whom the complaint for sexual harassment has been lodged.

“Workplace”- refers to premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the company; and Places visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey.

“Policy” or “This Policy” means policy on prevention of sexual harassment at the workplace.

“Company” means Eureka Industries Limited.

SCOPE: This policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India.

Sexual harassment would mean and include any of the following but not limited to,

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, or
- Physical Contact & advances; or
- A demand or request for sexual favours; or
- Sexually coloured remarks, including but not limited to vulgar / indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature; or
- Physical contact and advances such as touching, stalking, sounds which have explicit and for implicit sexual connotation/overtones, molestation
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas
- Verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance and has sexual connotation/overtone/ nature.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implied or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- Humiliating treatment likely to affect her health or safety

I. POLICY STATEMENT

- a. All employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b. All employees will understand and appreciate the rights of the individual to be treated with dignity.
- c. Employees will refrain from committing any acts of sexual harassment at work place.
- d. Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- e. Employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

II. INTERNAL COMPLIANT COMMITTEE:

The Internal Complaint Committee shall comprise of as many members as the Board of Directors may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise of the following:

- (i) One Presiding Officer who shall be a senior level employee of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) One member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The ICC shall have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company. The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

III. PROCEDURE FOR DEALING WITH COMPLIANTS OF SEXUAL HARASSMENT

- a. If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly

reported to the Internal Complaints Committee (ICC) through the respective HR Manager or the Unit/Location/Department Head.

- b. Ideally, the complaint should be lodged immediately or within a reasonable period 3 months from the date of incident/last incident.
- c. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. There may be a need to nominate a senior person to head the investigation.
- d. An “Internal Complaint Committee” will be set up to deal with the complaint. A female employee will head the committee and not less than half of its members will be women, further to prevent any undue influence, the committee will also consist of a third party, either an NGO or any other body familiar with the issue of sexual harassment.
- e. The complaint committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action;
- f. Any victimization of, or retaliation against, the complainant or any employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- g. In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.

IV. DISCIPLINARY ACTION

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority. Sexual harassment will not be tolerated at Eureka Industries Limited (“the Company”). If the outcome of an investigation by the Internal Complaints Committee shows that harassing behavior has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

V. MISCELLANEOUS

Company shall in consultation with the ICC periodically review the provisions of this Policy and its implementation (taking into account practical problems, if any, faced by the ICC and/or Company in the implementation of this Policy). Company reserves the right to amend the provisions of this Policy, from time to time, as it deems fit, subject to applicable law.

This Policy will not prejudice any rights available under the Protection of Human Rights Act, 1993, The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or any other legislation.