

Policy of the Company
under the Sexual
Harassment of Women
at Workplace
(Prevention, Prohibition
and Redressal) Act,
2013

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I. COMMITMENT:

Synergy Steels Limited (Company) is committed to providing work environment free from harassment of any kind and in particular , a work environment that does not tolerate sexual harassment We respect the dignity of everyone involved in our work place , whether they are employees, supplier or our customers. The Company is also committed to promoting a work environment that is conducive to the professional growth of its 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 employees are not subjected to any form of harassment.

II. OBJECTIVE /PURPOSE:

This policy has been made with a view to :

- 1) Promote a work place based on equality & respect.

- 2) Awareness & sensitization about sexual harassment at work place.
- 3) Prevent Sexual harassment .
- 4) Provide formal and informal mechanism for redressal in case of complaint of sexual harassment at the work place.

III. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their 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:

1. All offices/ Works/plant or other premises where the Company's business is conducted.
2. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. Unwelcome sexual advances (verbal, written or physical),
2. Demand or request for sexual favours,
3. Sexually –Colored remarks,
4. Verbal abuse or “joking” that is sex-oriented,
5. Any conduct that has the purpose or 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.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. POLICY STATEMENT

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

VI. PROCEDURE FOR DEALING WITH COMPLAINTS 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.
- d) An “Internal Complaint Committee” has been set up to deal with the complaint.
- e) The Committee , before initiating the enquiry at the at the request of the agreed women , will take steps to settle the matter between her and the respondent

through mutual settlement . Whatever such mutual settlement has been arrived , the internal committee shall record it and send the same to HR to take action as per the recommendation.

- f) The Committee, while investigation the compliant referred to it, will call upon both the parties separately, listen, look at proof, verify documents produced by the parties , allow the parties to produce witness and to put forth their say. Both the parties during course of enquiry are given an opportunity of being heard.
- g) 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 finding of the report should be made available to the respondent and aggrieved women within 5 working days from the date of the completion of the enquiry.
- h) The Chairperson of the committee shall ensure that the complaint is attended within 10 working days after receiving it and the Investigation are completed with in 30 working days.
- i) The Chairperson after studying the report & discussion with the committee members shall submit her recommendation to HR with in 10 days after completing the inquiry.
- j) The Implementation of the recommendation of Internal Complaint Committee by HR shall be done with 30 days after the receipt of such recommendation.
- k) 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.

VII. INTERNAL COMPLAINT COMMITTEE (ICC)

The committee will be chaired by a senior female employee of the company. In addition, the members would include one senior employee, a senior HR person. The members of the committee will be rotated every 3 years.

The Internal Complaint Committee may constitute sub-committees for places where SYNERGY factories and regional offices are located. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

VIII. CONFIDENTIALITY

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by SYNERGY shall not be published, communicated or made known to the public, press and media in any manner. 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. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

IX. MEMBERS OF INTERNAL COMPLAINT COMMITTEE (ICC)

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 woman employee of the Company;
- (ii) One Senior Employee preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) HR Manager;

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.

X . The company will make all efforts to communicate this policy all employees at all locations in the country.