

Prevention of Sexual Harassment

Policy

Objective

Garware Hi-Tech Films Limited believes in a positive work environment centered on its values and requires the effort of all to create a culture where employees can work together without any fear of sexual harassment. The policy aims at ensuring that all employees maintain appropriate standards of business and personal conduct with colleagues, clients and with the public at large. It is the intention of the Organization to take all necessary actions required to prevent, correct and if necessary, discipline behavior which violates this policy.

Scope

All employees

1. Definition

As per the guidelines laid down by the honorable Supreme Court of India, prohibiting sexual harassment; sexual harassment includes such unwelcome sexually determined behavior, such as:

physical contact;

- a demand or request for sexual favors;
- sexually - colored remarks;
- showing pornography;
- any other unwelcome physical verbal or non-verbal conduct of sexual nature.

Sexual harassment can take place in any of the following forms:

- a) Verbal: Suggestive comments or questions of a sexual nature, humor and jokes about sex or gender specific traits, sexual propositions and unwarranted pressure for dates, insults, threats, unwanted letters, phone calls or interviews which explicitly discuss personal sexual matters, displaying sexually suggestive objects, pictures showing pornography, cartoons, gossip regarding one's sex life

- b) Non-verbal: Leering, whistling, suggestive or insulting sounds and gestures, offensive written notes
- c) Physical: Touching the body (brushing, patting, pinching), "friendly" arms around the shoulder, actual or attempted sexual assault, and actual or attempted rape.

Implementation Guidelines

- a) Each employee maintains an appropriate standard of conduct with his/ her colleagues.
- b) Each employee is personally responsible for adherence to the laid down code of conduct in his/ her range of work. The employee must ensure that he/she does not get involved in any inappropriate act, conduct, conversation or dealings in his/ her official, private and personal spheres.
- c) It is the responsibility of every employee to communicate/ report any unacceptable behavior of the kind mentioned in the definition to sexual harassment, initiated towards self or colleagues.

2. Complaint Procedure: -

- a) To redress complaints of sexual harassment, a Complaint Committee shall be formed consisting of Sr. Officials as per the prevailing law.
- b) Employees can file a complaint on sexual harassment to any of the members of the Complaints Committee. The complaint can be filed through email or in writing.

3. Complaint Committee: -

For HO, Mumbai: – Mr B. D. Doshi - Director, Head-HR, Company Secretary and Ms. Asha Gawade.

For Plants at Aurangabad: – Mr C. J. Pathak –Whole Time Director, Head-HR, President – Engineering and Ms. Asha Gawade.

Sexually harassed women at workplace can also file a FIR directly at the police station, under section 509 of Indian Penal code as a criminal offence - "Outraging the modesty of women physically/ verbally/ gestures/ exhibits". The

punishment in such cases is 1 (one) year of imprisonment or fine or both.

4. Sufficient precaution will be taken by the Organization to ensure that complete confidentiality is maintained and no form of discrimination is faced by the employee who has escalated the complaint.
5. On receipt of any complain, the Complaint Committee will investigate all complaints thoroughly and promptly, in a free and fair manner. The investigation may include private interviews with the person filing the complaint, the person alleged to have committed the offence and witnesses, if any. The person filing the complaint will be informed of the outcome of the investigation. As far as possible, all efforts will be made to complete the investigation within 30 days from the date of the complaint.
6. If the investigation reveals that sexual harassment has been committed, the Committee will have a recommending role and cannot decide the punishment. It will forward its recommendations to the Chairman and Managing Director/Executive Committee, who will decide the disciplinary action.
7. The Complaint Committee will maintain a complaint register keeping track of complaints received and the process followed.
8. The Committee will also make a report to the concerned government department on the complaints and action taken by them.
9. In third party harassment, i.e. sexual harassment caused by outsiders who are not the employees of Garware Hi-Tech Films Limited, the Committee will play a role of providing moral support, if a regular complaint is received then action can be taken by informing the police in that area.

Disciplinary Action

- a) If the investigation reveals that sexual harassment has been committed by any of Garware Hi-Tech Films Limited employees, prompt and appropriate disciplinary action will be taken, as decided by the Chairman and Managing Director/Executive Committee. Such action(s) may include written or verbal warnings, suspension, or termination of employment.
- b) Retaliation against an employee who has complained of sexual harassment will attract disciplinary action.
- c) False accusations of sexual harassment or other unlawful behaviour can be damaging to an accused employee and disruptive to Garware Hi-Tech Films Limited's operations. Thus, intentional misuse / abuse of this policy will also result in strict disciplinary action against complainant
