



## PREVENTION OF SEXUAL HARASSMENT POLICY

<b>REF. NO.</b>	MMPL/CSR/HR/P 07	<b>Issue No./Date</b>	00/30.06.2024
<b>Page No.</b>	1 of 4	<b>Rev No./Date</b>	00/30.06.2024

This policy gives guideline about prevention, protection and redressal of sexual harassment of women at workplace as per "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013" Sexual harassment is a punishable offence and any complaint against it will be dealt as per this policy.

### **Policy Objectives: –**

To maintain a positive climate and a safe work environment at workplace in which individuals can work in an atmosphere without fear of prejudice, gender bias, coercion and intimidation. Sexual harassment is destructive of such environment and the company has zero tolerance for sexual harassment and therefore, laid down a policy and procedure to deal with the sexual harassment complaints as provided in this guideline following the provisions of the sexual harassment of women (& others for example transgender) at the workplace (prevention, protection and redressal) ACT, 2013 read with rules frame there under, the company has formatted this policy to redress a complaint filed by any of its women employee for sexual harassment and for matters connected therewith or incidental thereto and also to provide protection against sexual harassment to her at workplace.

### **Acts under Sexual Harassment: –**

Following acts are included as act of sexual harassment;

1. Physical contact and advances; or
2. Demand or request for sexual favors; or
3. Making sexually colored remarks; or
4. Showing pornography; or
5. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Also following circumstances occurs comes under sexual harassment;

1. Implied or explicit promise of preferential treatment in her\* employment; or
2. Implied or explicit threat of detrimental treatment in her\* employment; or
3. Implied or explicit threat about her\* present or future employment status; or
4. Interference with her\* work or creating an intimidating or offensive or hostile work environment for her\*; or
5. Humiliating treatment likely to affect her\* health or safety,

**\* means Women or Others like Transgender**



## PREVENTION OF SEXUAL HARASSMENT POLICY

<b>REF. NO.</b>	MMPL/CSR/HR/P 07	<b>Issue No./Date</b>	00/30.06.2024
<b>Page No.</b>	2 of 4	<b>Rev No./Date</b>	00/30.06.2024

### **Complaint Mechanism: –**

1. Work harassment committee has been constituted by management to address sexual harassment complaints.
2. A qualified prestigious lady working with NGO or doing social work who wish to join the committee without any remuneration, not related to company or having any relationship with directors will chair the committee and other members will be;  
One of the directors of the company,  
Head HR,  
Any two female employees willing to participate.
3. In case if charge is on any of the committee person, then committee will meet excluding that member.
4. The name and contact of participants will be communicated to all employees through e-mail and also will be published on notice board & website of company.
5. In case any of member resigns, new member will be added & communication will be in similar way as mentioned above.
6. The committee will meet in less than 24 hours after receipt of any complaint.
7. In normal circumstances, the committee will meet once per quarter.
8. Any complainant who wish to make sexual harassment complaint, can register complaint in any of following manner;
  - Can e-mail to any or all members of sexual harassment committee.
  - Can message her complaint to any or all sexual harassment members.
  - Can make phone call to any or sexual harassment members.
9. Upon receipt of complaint, the committee will investigate the matter.
10. The committee will take written statement of complainant and respondent and will try to find the facts and proofs.
11. The committee will help the complainant to file a police case if she wishes to do so.
12. During the investigation, the complainant can be granted paid leave up to 1 month.
13. Also respondent can be granted paid or unpaid leave at discrimination of sexual



## PREVENTION OF SEXUAL HARASSMENT POLICY

<b>REF. NO.</b>	MMPL/CSR/HR/P 07	<b>Issue No./Date</b>	00/30.06.2024
<b>Page No.</b>	3 of 4	<b>Rev No./Date</b>	00/30.06.2024

harassment committee.

14. If needed sexual harassment committee can appoint subcommittee to investigate the matter in speedy and careful manner.

### **Findings of the committee and action required: –**

1. Where the sexual harassment committee arrives at a conclusion that the allegations against the respondent, have not been proved, it shall recommend to the management that no action is required to be taken against the respondent.
2. In case the sexual harassment committee comes to finding that the allegation was false or malicious or the complainant has produced forged documents as evidence, it shall conduct an enquiry against the complainant and may recommend to the management the action to be taken against the complainant. The company shall implement the decision of the sexual harassment committee.
3. In case the sexual harassment committee comes to a finding that the allegation against the respondent has been proved, it shall recommend to the management.
  - A. To take action for sexual harassment as misconduct as it deems appropriate in accordance with the service rules applicable to the respondent, appropriate action against the respondent for such misconduct would include reprimand, written apology and / or termination of services without notice. The respondent will not be entitled to any compensation for the notice period.
  - B. In case of major, serious issues the chair person will file a complaint and if possible will encourage complainant to register a case against respondent in nearby police station.
  - C. In case of complaint against the Director of the company, the chair person shall take suitable action under suitable IPC.

### **Confidentiality: –**

1. All parties concerned shall maintain strict confidentiality in respect of all aspects of the complaints including but limited to the contents of the complaint, the identity and addresses of the complainant, respondent and witnesses, recommendations of the committee and the action taken by the company. Such action shall not be published or made known or disseminated in any form either privately or in any public media.
2. Any breach of the confidentiality provision by any person shall be liable to penalty.

### **Communication Strategy: –**

Training will be given to all employees, contract labors, and stake holders regarding;

1. Understanding detail definition and scope of sexual harassment policy.
2. Understanding detail general guidelines regarding language, physical gestures, behaviors, code of conduct etc.



# MANTRI METALLICS PVT.LTD.

## PREVENTION OF SEXUAL HARASSMENT POLICY

<b>REF. NO.</b>	MMPL/CSR/HR/P 07	<b>Issue No./Date</b>	00/30.06.2024
<b>Page No.</b>	4 of 4	<b>Rev No./Date</b>	00/30.06.2024

3. Training will be given to all policy members and also at the time of new joining.
4. In case of change of policy, again training will be conducted for all stake holders, contract labors, employees etc.

### Power to Amend: –

The Management shall have the overriding right to withdraw and/ or amend the guideline at its own discretion as it deems fit from time to time. The decision of the Management shall be final and binding.

### Communication of this Policy: -

1. Training.
2. Notice board.
3. Company Web site.
4. Joining of new employee.
5. Company web site

### Committee Members -

Sr. No.	Members Name	Designation	Mail ID	Contact Details
01	Mrs. Aarti Agrawal	Chair Person	aarti.agarwal3112@gmail.com	9552540012
02	Mr. Prasad Mantri	MD	prasad@mantrimetallics.com	9513196555
03	Mr. Milind Kulkarni	HR Consultant	mbkulkarni@mantrimetallics.in	9049008195
04	Miss. Shivani Kamble	Trainee HR	shivani.kamble@mantrimetallics.in	7741927592
05	Miss. Mansi Deshpande	Visiting HR consultant	Mansi141993@gmail.com	9503879639

**Note** - In case if charge is on any of the committee member person, then committee will meet excluding that member.