	GROZ ENGINEERING TOOLS PVT. LTD.		Doc No : POL/HRD/06
	Issue No-02	SEXUAL HARASSMENT OF WOMEN AT WORK PLACE POLICY	Rev. Nr- 03
	Issue Date - 01/09/2018		Rev. Date : 25th March,2023

POLICY FOR PREVENTION OF SEXUAL HARASSMENT

(Rules and Constitution of Internal Complaints Committee for prevention, Prohibition and Redressal of complaints of Sexual harassment of women at Work Place)

1.0 BACKGROUND

The Policy on 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 is in line with guidelines and norms laid down by the Hon'ble Supreme Court in Vishakha and Others vs State of Rajasthan.

OBJECTIVE

To implement guidelines & procedures & establish a complaint resolution committee to effectively combat and prevent sexual harassment at work and to resolve complaints against such conduct in a fair and timely manner.

GROZ ENGINEERING TOOLS PVT LTD is an equal employment opportunity company (EEOC) and is committed to creating a healthy working environment that enables employees to work without fear or prejudice, gender bias and a harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving an employee or employees is a grave offence and is therefore, punishable.

POLICY

1.1 The company aims to provide a safe working environment and prohibits any form of sexual harassment.

1.2 In this policy, any reference to "Act" means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (14 of 2013) and rules made thereunder.

1.3 This policy prohibits such occurrences and also details procedures to follow when an employee believes that a violation of the policy has occurred within the ambit of all applicable regulations under Sexual Harassment

1.4 Making a false complaint of Sexual Harassment or providing false information regarding a complaint will also be treated as a violation of policy and dealt with accordingly.

Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

This Policy comes into force with immediate effect.

1.5. Sexual Harassment would mean and includes any of the following but not limited to:

- a) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct implicit or explicit;
- b) Physical contact and advances such as touching, stalking, sounds which have explicit and / or implicit sexual connotation/ overtones, molestation;
- c) A demand or request for sexual favor;
- d) Sexually colored remarks including, but not limited to vulgar/ indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.;
- e) Showing pornography such as display of pictures, signs etc. with sexual nature/connotation/ overtones in the work area and work-related areas;
- f) Verbal or non- verbal communication which offends the individual's sensibilities and affect her performance and has sexual connotation/ overtone/ nature.
- g) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

1.6. 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:

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

An alleged act of Sexual Harassment committed during or outside of office hours including the concept of "notional employment" falls under the purview of this policy.

2.0 SCOPE & APPLICABILITY

2.1 This Policy extends to all employees of the company including outsourced employees, on deputation, temporary either directly or through a third party, including a contractor, whether for remuneration or not, working on a voluntary basis or otherwise.

2.2 This policy is with respect to prevention, prohibition and redressal of Sexual Harassment which may arise in places not limited to geographical locations viz., Company offices/branches but also includes all such places or locations where acts are conducted in the context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment

2.3 Sexual Harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual Harassment as addressed in this policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of the same gender.

The extended "Workplace" - Any place visited by the employee arising out of, or during course of employment, including transportation provided by employer.

Interactions arising as a result of employment within the company.

All the visitors & vendors associated with us & visiting any premises of the company or whose premises our employees visit during the course of business.

This policy will extend to all employees of the Company including those employed on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, customers, visitors, vendors, suppliers, contractor or contract worker, probationer, trainee, apprentice or called by any other such name, whether for the remuneration or not, or working on a voluntary basis or otherwise as per the terms of employment as are express or implied but are subjected to sexual harassment at the Premises (defined hereinafter) of the Company.

3.0 SEXUAL HARASSMENT DEFINITION

3.1 Sexual harassment would mean and include any of the following:

- i) Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- ii) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mails, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;
- iii) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- iv) Any unwelcome gesture by a person having sexual overtones.
- v) Act or conduct by a person in authority which creates hostile work environment at workplace or intimidating to a person belonging to the other sex;

HOSTILE WORK ENVIRONMENT INCLUDES

Hostile environment sexual harassment occurs when either speech or conduct with a sexual intent takes place and is seen or perceived as offensive and interferes with the work performance of the recipient.

Hostile environment sexual harassment may also include intimidating or harassing conduct having sexual colour that is directed at an individual or a group of individuals

This is only an indicative list of the possible acts which could be treated as Sexual Harassment and is no way intended to be construed as an exhaustive list. Hostility created by a conduct with an element of sexual intention resulting into unharmonized workplace reflects an act of Hostile work environment. Such types of behaviour or intent is prohibited at Ms/ **GROZ ENGINEERING TOOLS PVT LTD**

3.2 "Employee" means any person on the rolls of the Company including outsourced employees, on deputation, temporary either directly or through a third party, including a contractor, whether for remuneration or not, working on a voluntary basis or otherwise. It even include a visitor or an employees family member visiting the organization.

3.3 “Aggrieved Person” means a person who alleges to have been subject to any acts of sexual harassment

3.4 Complainant / Aggrieved

The POSH enactment still defines the word as “ Aggrieved Women” but many judgments of Apex Court has focused that sexual Harassment as an offense can be with/ against anyone irrespective of sex/ gender and we at Groz company believe and respect neutrality. Hence, an aggrieved in relation to a workplace, is a person, of any age, whether an employee or not, who alleges to have been subjected to any act of Sexual Harassment.

A complainant is any aggrieved individual (if the aggrieved is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

3.5 Accused/ Respondent

A Respondent means the person against whom the complainant has made a complaint.

3.6 Committee for the Prevention of Sexual Harassment

Committee for the Prevention of Sexual Harassment means a forum of minimum 5 people who will investigate complaints of alleged sexual harassment and make recommendations for the resolution to management.

3.7 Chairman/ Management

Chairman means the Managing Director or any authorized person holding the overall responsibility of Management, supervision and control of the company.

4.0 INTERNAL COMPLAINTS COMMITTEE

4.1 The committee will constitute of the following members nominated by the company from time to time.

(A) Presiding Officer (Chairperson) who shall be a woman employee at a senior level at workplace amongst the employees

(B) Not less than 2 members shall amongst employees preferably committed to the cause of women or who have had experience in social work or have the legal knowledge

(C) One member from amongst Non- governmental organization (NGO) or associations committed to the cause of the women or person familiar with issues relating to sexual harassment. Provided that, at least one half of the total members so nominated shall be women.

4.2 The Presiding Officer and every member of the committee shall hold office for a period of three (3) years from their date of nomination.

4.3 In addition to the handling of complaints of sexual harassment, the IC is responsible for :-

(a) Review the complaints in a fair and objective manner

(b) Determine the facts of the case with individuals concerned and witnesses if any

(c) Be bound by the principals of natural justice and be unbiased in their evaluation

4.4 A quorum of 4 members including Presiding officer and external member is required to be present for the proceedings to take place.

5.0 Complaint Procedure

5.1 a) Any employee who feels and is being sexually harassed directly or indirectly, such aggrieved employee may file a written complaint with any member of the committee in their state or send an email to GCC@groz-tools.com within a period of 03 months from the date of the incident or in case of series of incidents, within a period of 03 months from the date of the last incident. Provided that the Internal Committee may extend the time not exceeding 03 months, for the reasons to be recorded in writing, if it is satisfied that the circumstances were such which prevented the aggrieved employee from filing a complaint within the said period.

b) The maximum limitation period for filing a complaint is 9 months from the incident. The IC has the discretion to examine the contents of the complaint.

c) Anonymous complaint shall not be examined by IC.

5.2 In case the complaint cannot be made in writing the Presiding Officer or any member of the committee, as the case may be, shall render all reasonable assistance to the Aggrieved Employee for making the complaint.

5.3 In cases where the aggrieved employee is unable to make the complaint on account of physical incapacity or under any other circumstances a complaint may be filed by:-

(a) His/her relative or a friend or

(b) His/her co-worker or

(c) Any person who has knowledge of the incident, with the written consent of the aggrieved employee

A due consent in writing or an order in the proceeding with affirmation from all the members of the committee shall be made in any other case as specified where the aggrieved himself/herself is unable to make a complaint. The decision of the majority of the committee shall be final.

5.4 The complaint needs to be a detailed complaint, along with any documentary evidence available or names of witnesses.

Any written complaint received in any form shall also be accepted. The complaint can be submitted to any IC member or any member in the company. Such complaints shall be immediately forwarded to the IC for evaluation whether the complaint falls under the jurisdiction of IC.

The IC may, but shall not be bound to, accept oral complaints under this Policy.

The committee will maintain a record of the complaints received by it and keep the contents confidential.-

5.5 The Committee will maintain a record to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

5.6 The Committee will hold a meeting with the Complainant under the provision of Section 9 and record the statement.

5.7 Once the complaint is received before initiating an enquiry and at the request of aggrieved employee takes step to settle the matter between the employee and respondent through conciliation. However, IC shall ensure that:-

(a) No monetary settlement shall be made as a basis of conciliation.

(b) Where the settlement is arrived at, the settlement terms shall be signed by both parties and shall be provided with a copy of it.

Where a settlement has arrived at no further enquiry shall be conducted by the Internal Committee.

The proceedings shall be made subject to principle of natural justice and opportunity of being heard shall be given to the respondent.

Where a settlement is arrived, no further inquiry shall be conducted by the Committee, as case may be. The Committee shall provide the copies of the settlement as recorded to the Aggrieved & the respondent.

In case the conciliation fails to arrive at a settlement or if any of the parties informs the Committee that the terms and conditions of the settlement have not been complied with by either of the parties, the Committee shall proceed to make an inquiry into the complaint filed before the Committee. The entire procedure of law and the attendance can be enforced by the committee in terms of the rules and guidelines laid down by the said law. The statement of the witnesses shall be recorded and the fact-finding proceedings shall be initiated as per law.

The Committee shall make all efforts to deal with all complaints expeditiously and seek to adhere to a reasonable time frame as per guidelines.

5.8 If no settlement is arrived, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. The Statement of allegations will be shared with the respondent seeking his response towards the allegations.

5.9 The respondent shall be noticed for appearance and submission of his response to the statement of allegations along with list of documents and names and addresses of witnesses if any and submit to the IC within a period not exceeding ten (10) working days from the date of receipt of communication, where after, an "Enquiry" shall be conducted and concluded.

In case the complaint is found to be false, the provision shall be adapted as per Proviso 13 of this policy.

The Committee shall complete the "Enquiry" within reasonable period but not beyond three months unless there are specific reasons for delays (90 days) and submit its reports and its recommendations for action to the Management of Groz Engineering Tools Pvt. Ltd.. within a period of ten days from the date of completion of the inquiry and such report should be made available to the concerned parties.

5.10 The report of the committee shall be treated as an enquiry report and the Management will direct appropriate action in accordance with the recommendation proposed by the Committee.

5.11 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

5.12 In case the complaint is found to be false & malicious, appropriate disciplinary action shall be adopted by the Management

IN CASE AGGRIEVED/RESPONDENT DON'T SHOW UP FOR 3 CONSECUTIVE

HEARING : THEN EXPARTE

POWERS AND DUTIES OF INTERNAL COMPLAINT COMMITTEE (IC)

For the purpose of making an enquiry, the Committee has the following powers:-

- i. To process individual grievances concerning sexual harassment in the workplace.
- ii. Summon and enforce the attendance of any person and examine her/him on oath.
- iii. Requiring the discovery and production of documents.
- iv. Transfer the aggrieved employee or the respondent to any other workplace.
- v. Grant leave to the aggrieved employee up to a period 3 months on aggrieved request of fear.
- vi. It is the responsibility of the IC and the employer to prohibit disclosing the identity and address of the aggrieved, respondent and the witness. Anyone who discloses the same will be penalized with INR 5000 or more depending upon gravity of offence.
- vii. The Internal Committee, in each calendar year shall prepare an annual report and submit the same to the employer or the district officer as per the guidelines.

RESPONSIBILITIES OF INTERNAL COMPLAINT COMMITTEE (IC)

- Investigating every formal written complaint of sexual harassment.
 - Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
 - Discouraging and preventing employment-related sexual harassment
 - On the request of the aggrieved, the IC can take steps for settlement; however, no monetary settlement shall be made as the basis of conciliation.
 - The Internal Committee shall provide the copies of the recorded settlement to the aggrieved and the respondent on request.
 - In case the aggrieved/respondent does not abide to the recorded settlement; the IC reserves its rights to adopt appropriate actions on the breach of settlement.
 - All the parties shall be given an opportunity of being heard
- I. Handling complaints of sexual harassment at the workplace.
 - II. Initiating and conducting inquiry as per the established procedure.
 - III. Submitting findings and recommendations of inquiries.
 - IV. Coordinating with the employer in implementing appropriate action.
 - V. Maintaining strict confidentiality throughout the process as per established guidelines.
 - VI. Submitting annual reports in the prescribed format.

6.0 ENQUIRY PROCESS

6.1 The Committee after receiving a written complaint shall proceed with the Enquiry and communicate the same to the Complainant and person against whom the complaint is made.

6.2 The Internal Committee being a quazi judicial authority shall have the powers of a civil court under the Code of Civil Procedure, 1908. The Committee shall enquire into the complaint in accordance with the Principles of Natural Justice.

6.3 During the pendency of an enquiry, on a written request made by the aggrieved employee, the internal committee may recommend to the company to:

- i) To transfer the aggrieved employee or respondent to any other workplace; or
- ii) Grant leave to the aggrieved employee up to a period of three months; or
- iii) Grant such other relief to the aggrieved employee as may be prescribed. The leave granted to the aggrieved employee shall be in addition to the leaves he/she would be otherwise entitled.

6.4 If the Complainant or the person against whom the complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call during their respective hearings / proceedings.

6.5 The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings.

6.6 If the Complainant desires to tender any documents by way of evidence before the IC, she / he shall supply original copies of such documents during the proceedings / hearings.

6.7 Similarly, if the person against whom the complaint is made desires to tender any documents in evidence before the IC he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.

6.8 The IC shall call upon all witnesses mentioned by both the parties ensuring confidentiality.

6.9 The IC shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

6.10 The IC will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment.

6.11 The IC shall have the right to terminate the inquiry proceedings or to give ex-parte decision on the complaint, if the aggrieved employee or respondent fails, without sufficient cause, to present herself or himself for three (3) consecutive hearings convened by the Presiding Officer, provided fifteen (15) days advance notice is provided to the party concerned, provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen (15) days in advance, to the party concerned.

6.12 The investigation into a complaint shall be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.

6.13 The IC shall complete the "Enquiry" within reasonable period but not beyond 90 days and communicate its findings and its recommendations to the Company within a period of 10 working days from the date of completion of enquiry and such report shall be made available to the concerned parties. The report of the IC shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

6.14 The IC shall make a determination regarding the validity of the harassment allegations. If it is determined that the harassment has not occurred, it shall recommend to the Company that no action is required to be taken in this matter. The IC shall share investigation details and the findings thereof with the Head of Human Resources department.

6.15 The organization shall act on the recommendation proposed by the Committee within 60 days from the date of receipt.

6.16 This policy shall not be used to raise malicious complaints. If the complaint has been made in bad faith, as demonstrated by clear and convincing evidence, appropriate disciplinary action may be taken against the person raising such complaints

6.17 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7.0 APPEAL

Any person aggrieved with the recommendations made by the committee/disciplinary action taken by the Company may prefer an appeal to the Appellate Authority constituted by the Company within a period of thirty (30) days from the date of the recommendation.

The decision of the Appellate Authority shall be final and binding on all, however the same is without any prejudice to any recourse that the Company or the individual concerned may have to pursue nor shall be precluded from pursuing such further and other legal actions as may be available within a period of sixty (60) days from the date of the decision of appellate authority.

8.0 OTHER POINTS TO BE CONSIDERED

8.1 The Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

8.2 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

8.3 The contents of complaints made under the Policy, identity and addresses of the aggrieved employee, respondent and witnesses, any information relating to conciliation and enquiry proceedings, recommendations of the IC and the action taken by the company shall not be published, communicated or made known to the public, press, media in any manner. Provided that information may be disseminated without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the parties involved.

8.4 The Company shall display the notice showing the name of the respective Internal Complaints Committee members at its every location at a conspicuous place.

8.5 This policy will be implemented and reviewed by the management. The Company reserves the right to amend, abrogate, modify, rescind/reinstate the entire policy or any part of it at any time.

ANNEXURES

Duties of Employer

The Company shall

- a) Provide a safe working environment at the workplace which shall include safety from the external persons coming into contact at the workplace;
- b) Display at any conspicuous place in the workplace, the penal consequences of sexual harassments
- c) Organize workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed;
- d) Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry;
- e) Assist in securing the attendance of respondent and witnesses before the Committee;
- f) Make available such information to the Internal Committee as it may require having regard to the complaint made;
- g) Provide assistance to the Aggrieved Employee if he/ she so chooses to file a complaint against the respondent in relation to the offence under the Indian Penal Code or any other law for the time being in force;
- h) Cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the Aggrieved Employee so desires, where the perpetrator is not an employee , in the workplace at which the incident of sexual harassment took place;
- i) Treat sexual harassment as a level 3 misconduct under the disciplinary policy of the Company and initiate action for such misconduct;
- j) Monitor the timely submission of reports by the Committee

ROLES & RESPONSIBILITIES OF THE POSH COMMITTEE

The company aims to provide a safe working environment and prohibits any form of sexual harassment. The policy prohibits such occurrences and also details procedures to follow when an employee believes that a violation of the policy has occurred within the ambit of all applicable regulations under Sexual Harassment.

INTERNAL COMMITTEE

To specifically address and effectively deal with complaints pertaining to such cases "Internal Committee" (IC) shall be formed at Corporate Office (CO) and Regional Office (RO) at Chennai. The CO IC will cater to complaints of employees in CO, all offices and branches in West and North and RO IC will cater to complaints of all employees in the South states. The committee will constitute of the following members nominated by the company from time to time.

- (a) Presiding Officer (Chairperson) who shall be a woman employee at a senior level at workplace amongst the employees
- (b) Not less than 2 members shall amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge
- (c) One member from amongst Non- governmental organization (NGO) or associations committed to the cause of the women or person familiar with issues relating to sexual harassment.

Provided that, at least one half of the total members so nominated shall be women.

The Presiding Officer and every member of the committee shall hold office for a period of three (3) years from their date of nomination.

In addition to the handling of complaints of sexual harassment, the IC is responsible for:-

- (a) Review the complaints in a fair and objective manner
- (b) Determine the facts of the case with individuals concerned and witnesses if any
- (c) Be bound by the principles of natural justice and be unbiased in their evaluation

REDRESSAL PROCESS

Any employee who feels and is being sexually harassed directly or indirectly, such aggrieved employee may file a written complaint with any member of the committee in their state or send an email to **GCC@groz-tools.com** within a period of 03 months from the date of incident or in case of series of incidents, within a period of 03 months from the date of last incident.

Provided that the Internal Committee may extend the time not exceeding 03 months, for the reasons to be recorded in writing, if it is satisfied that the circumstances were such which prevented the aggrieved employee from filing a complaint within the said period.

In case the complaint cannot be made in writing the Presiding Officer or any member of the committee, as the case may be, shall render all reasonable assistance to the Aggrieved Employee for making the complaint.

In cases where the aggrieved employee is unable to make the complaint on account of physical incapacity or under any other circumstances, a complaint may be filed by:-

- (a) His/her relative or a friend or
- (b) His/her co-worker or
- (c) Any person who has knowledge of the incident, with the written consent of the aggrieved employee. The complaint needs to be a detailed complaint, along with any documentary evidence available or names of witnesses.

OTHER POINTS TO BE CONSIDERED

- a. The Committee may recommend to the MANAGEMENT action which may include transfer or any of the other appropriate disciplinary action.
- b. The Groz Engineering Tools Pvt. Ltd.. Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- c. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

- d. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint and submit the IC Report.
- e. Penal Consequences of Sexual Harassment- In addition to action which the Management may initiate under the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013, the following liability may arise under the Indian Penal Code.
- f. Protection against victimization
- i. Company has an obligation to ensure that a person who lodges a complaint in good faith and without malice is protected, and will not allow a person raising a concern to be victimized for doing so. In the unfortunate event where, despite the best of precautions, the complainant would be victimized, will treat this as a serious matter and take disciplinary action against the perpetrator.

9. Deviations

- Any deviations to this policy require approval from the Managing Director.
- Management reserves the right to modify or terminate this policy without prior notice.

10. Preventive Steps:

POSH Committee shall take all reasonable steps to ensure prevention of sexual harassment at work. Such steps shall include:

- Circulation of the policy in English / Vernacular in Office / Plant / Works locations on Sexual harassment to all direct / indirect employees.
- Sexual harassment will be affirmatively discussed at monthly meetings, workshops etc.
- Conduct regular in-house training or provide awareness sessions to the new joiners during the Orientation program on sexual harassment.
- Guidelines will be prominently displayed to create awareness of the rights of employees.
- A commitment is required from all the levels of the organization for the positive implementation of the policies and procedures made against sexual harassment.
- Widely publicize that the Sexual Harassment is a crime & will not be tolerated.
- Names and contact numbers of members of the POSH committee will be prominently displayed in all the Offices.

11. GUIDELINES FOR GRIEVANCE HANDLING

- No person who is a complainant, witness, or defendant in the complaint of gross misconduct or sexual harassment shall be a member of the Committee.

- The Committee shall enquire into the complaint of sexual harassment by following procedures in conformity with the principles of natural justice and gender sensitivity.

12. INQUIRY REPORT:

- On completion of the enquiry, report shall be submitted to the Management. Copies of such report shall be made available to the parties on their specified request.
- If based on the basis of the findings the person against whom the complaint is made is found guilty, the Committee shall recommend the Management to take action against sexual harassment as misconduct.
- Action shall be initiated by the Management within the framework of the rules of discipline or as per the contract of employment.

13. ACTION FOR FALSE COMPLAINT

- 13.1 Where the Committee arrives at conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making an allegation has produced false or misleading documents/evidence, it may recommend to the Management to take action against the employee making false allegation.
- 13.2 A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this Act. Malicious intent on the part of the complainant shall be established after the enquiry in accordance with the procedure prescribed, before any action prescribed.

14. INTERPRETATION

- 14.1 On any occasion or any doubt, differences or dispute in respect of proper interpretation of any terms, condition or clause hereof, the resolution of dispute or the interpretation of such clause given by the Management shall always be final and binding between the parties. The Company reserves the right to review and revise this policy at any point of time. This policy shall supersede any other previous policies/communications on the subject.
- 14.2 Nothing contained in this policy shall prejudice any right available to the aggrieved employee from seeking any legal remedy under the National Commission of Women Act, 1990, Protection of Human Rights Commission Act, 1993 or under Indian Penal Code and or any other rule for the time being in the force.

15. DISCLAIMER

- 15.1 This document is the sole property of the Company and may not be copied, used or disclosed for any purposes except as authorized in writing by the Company. The provision of the said policy shall prevail in case of any inconsistency arise with policy terms.
- 15.2 The company has displayed the communication details of IC members at the notice board to adhere or register the complaints. In case of misuse, the IC shall reserves its rights to take appropriate action i.e. on first wrong issue warning or charge a fine

of Rs. 5000/- (Rupees Five thousand) for every subsequent malicious calls thereafter action shall be taken as per the policy of the company .

(All such contributions in form of fines in IC shall be utilized by the company for women welfare only.)

16. CONCLUSION

At Groz Engineering Tools Pvt. Ltd. it has been the constant effort of all the employees in creating conducive work environment where the relationship between male and female employees is extremely cordial. However, the objective of this policy is to create awareness amongst the employees. There has also been alteration in statute and therefore it would be the responsibility of CI team / HR team and business heads to provide awareness program to the New joiners or conduct regular sessions/training programs on such important issue and create an excellent, comfortable work environment for the employees.

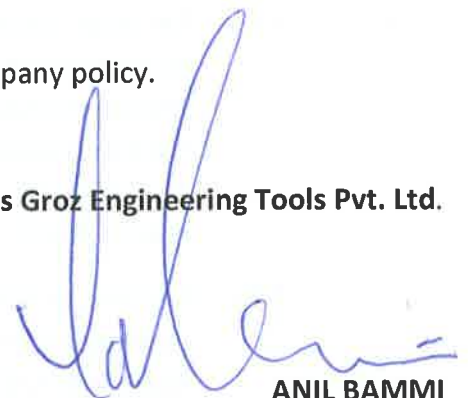
Please Note: The Groz Engineering Tools Pvt. Ltd. has a zero tolerance towards sexual harassment. In case the complainant is not satisfied by the internal inquiry, she can file a complaint with the police and the employer will assist her in doing so.

Responsibilities of the employees:-

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

Note: Details about this policy is being incorporated in the company policy.

M/s Groz Engineering Tools Pvt. Ltd.



ANIL BAMMI
(Chairman & Managing Director)