

**KAISER CORPORATION LIMITED**

**POLICY ON PREVENTION OF SEXUAL HARASSMENT AT  
WORKPLACE**

*[Pursuant to The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013]*



### 1. Objective:

We, KAISER CORPORATION LIMITED (“the Company”), believe in the right of all its employees to work with dignity, in a safe and secure environment and all are expected to treat their co-workers with respect, dignity and in a professional manner. To this end, the objective of this policy is to provide all employees of the Company with a safe work environment, free from any kind sexual abuse / harassment / assault.

It is the policy of the Company that all its employees are responsible for ensuring that the workplace is free from any activity of sexual abuse / harassment. Because of the Company’s strong disapproval of offensive or inappropriate sexual behaviour at work, all employees must avoid any action or conduct which could be viewed as sexual harassment.

We have framed and adopted a Policy on Sexual Harassment (“the Policy”) in reference to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“the Act”); incorporating the requirements as mandated by the law. The Company reserves the right to amend or update this Policy as required from time to time.

### 2. Applicability:

This policy shall be applicable to all employees of the Company, at all levels employed either at Corporate / Registered office or at plant site.

### 3. Definition of Sexual Harassment:

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- i. physical contact or advances; or
- ii. a demand or request for sexual favours; or
- iii. making sexually coloured remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

### 4. The Internal Complaints Committee (ICC) For Redressal of Sexual Harassment Complaints:

The Company in order to have a proper implantation and review of the policy has formulated the Committee comprising of the following Committee members:

The ICC at Corporate / Registered office:

- Ms. Anagha Korde - Presiding Officer
- Ms Priyanka Chaturvedi - Secretary
- Mr Jehangir R Patel - Member
- Mr Govind Salgaonkar - Member
- Mr Sunil Sakhare - Member

➤ **Tenure:** The Maximum tenure of the Committee member(s) shall be three years and the committee shall be reconstituted by the Management at such intervals as the Management deem fit to maintain the uniformity with the provisions of this policy and / or the Act.

➤ **Quorum:** Three (Presiding Officer must be present).



The Complaints Committee is responsible for:

- 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.

**5. Responsibilities regarding Sexual Harassment:**

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

**6. Procedure for Filing a Complaint:**

The complaint shall be made by an aggrieved employee or by their legal heir to ICC in writing within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of last incident.

Three copies of the complaint along with supporting document and names and addresses of the witnesses shall be sent either by post or given in person to any member of ICC of the establishment. A register shall be maintained to endorse the complaint received.

In case of delay in filing a complaint, and if the ICC is satisfied with the circumstances for the delay, it may extend further the time-limit not exceeding three months for filing a complaint and record the reasons in writing.

**7. Procedure for Inquiry into the Compliant:**

- The ICC shall hold a meeting with the aggrieved employee within 5 working days on receipt of complaint, but not later than a week.
- The ICC may, before initiating an inquiry and at the request of aggrieved party, take steps to settle the matter with no monetary settlement as a basis of conciliation. The copies of the settlement arrived during conciliation shall be provided to both the parties, and no further inquiry shall be conducted. In case the terms of conciliation have not been complied, initiate the action as determined in the policy.
- The ICC will go through the complaint against employee and initiate a detailed inquiry as deemed fit according to the provisions of rules, while for complaint against others, if prima-facie case exists, forward the complaint to the police, within a period of seven days.
- During the pendency of an inquiry, on a written request by an aggrieved employee, the ICC may recommend to the Management:
  - I. Transfer of aggrieved person or the respondent; or
  - II. Grant leave to the aggrieved person upto a period of 3 months
- For the purpose of making an inquiry, the ICC shall have the same powers as are vested with the Civil Court for the purpose of making an inquiry.
- The ICC shall submit its recommendations to the Management within a period of ninety days and the Management shall finally dispose of the case within a period of thirty days.



*Handwritten signature or initials.*

**8. Guidelines for ICC while Recommending Actions:**

The ICC shall investigate every complaint of sexual harassment and to determine that the allegation made under the complaint, falls under the purview of sexual harassment.

Following points shall be considered will initiating action:

- To conduct the inquiry as per the principles of natural justice and in confidential manner.
- In cases where compensation to be paid to the aggrieved employee, then ICC shall inform to the Management to deduct the said amount from the salary of the respondent and pay to the aggrieved employee or to their legal heir(s).
- In case respondent fail to pay the sum referred, the ICC may forward the order for recovery of the sum as arrears, to the concerned District Officer.
- In case allegation against respondent are concluded to be false / malicious, the ICC may refer to the Management to take action against complainant.

**9. Appeal:**

Any person (employee) aggrieved from the recommendation of the Internal Complaints Committee or non-implementation of such recommendation can appeal to the court or tribunal in accordance with the provisions of the Rules applicable to the said person within 60 days from such recommendation / order / judgement.

**10. Confidentiality:**

All records of complaints, including contents of meetings, results of investigation and other relevant material shall be kept confidential, except where disclosure is required under disciplinary or other remedial process.

**11. Access to Reports and Documents:**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.



**Bhushanlal Arora**  
**Managing Director**  
**Date: January 05, 2022**



xxx

xxx