

POLICY FOR PREVENTION OF SEXUAL HARRASMENT OF WORKFORCE

AT WORKPLACE –ZIRON TECHNOLOGIES INDIA LTD

1. Commitment and Expectations:

Zircon Technologies India Ltd. is committed to provide a work place where people can work and thrive in a healthy, safe, fearless and harmonious atmosphere. At Zircon we believe that it is in the best interest of each individual and the Company that we dedicate ourselves creating a work environment that promotes respect, dignity and equality and is free from all forms of sexual harassment, exploitation, intimidation, discrimination and retaliation. Zircon is committed to maintain a workplace where each employee's privacy and personal dignity are respected are protected from offensive or threatening behavior including violence.

It is expected of all the employees to conduct themselves in an appropriate and professional manner for the personal dignity of fellow employees and visitors. It is the responsibility of each member of the Company to demonstrate a basic generosity of spirit devoid of any expression of bigotry.

Zircon perceives harassment as a form of discrimination that is offensive, undermines the integrity of employment relationships and causes serious harm to the productivity, efficiency, stability and discipline of the Company.

Sexual harassment at work place or other than work place if involving employees is a grave offence and is therefore punishable.

2. Scope:

This Policy deals with the process and manner of investigating complaints against sexual harassment made by an employee or any person, against another employee or person related in some manner to or having repercussions, effect at the work place though the alleged harassment may have taken place within the Company premises or outside. The only requirement is a linkage with, effect at the work place in some form or other.

3. Definitions:

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- a. **Company**—means Zircon Technologies India Ltd [herein also called as ZTIL]
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- b. **Complainant**" means a person of any age whether employed or not, who alleges to have been subjected to any act, form of sexual harassment by an employee of the Company.
- c. **"Employee"** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, a contract worker, whether for remuneration or not / voluntary, whether full time or part time and includes a probationer, trainee, and apprentice or called by any other such name.

- d. **“Management / Employer”** means any person responsible for the management, supervision and control of the workplace of the Company and also includes a person or board or Committee responsible for formulation, implementation and administration of policies.
- e. **Internal Complaints Committee”** means an Internal Complaints Committee constituted as per point 4 below.
- f. **“Respondent”** means a person against whom a complaint by the Complainant is made.
- g. **Sexual Harassment”** means and includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-
 - a) physical contact and advances; or
 - b) a demand or request for sexual favours; or
 - c) making sexually coloured remarks; or
 - d) showing pornography; or
 - e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
 - f) means and includes any of the following acts or behavior, whether direct or indirect that is unwelcome to the intended recipient -
 - i. Any of the above, including comments, remarks or jokes communicated by letters, phone calls or through e-mail or any other communication medium;
 - ii. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of Sexual Harassment may amount to Sexual Harassment –
 - a. Implied or explicit promise of preferential treatment in complainant’s employment; or
 - b. Implied or explicit threat of detrimental treatment in complainant’s employment; or
 - c. Implied or explicit threat about complainant’s present or future employment status; or
 - d. Interference with complainant’s work or creating an intimidating or offensive or hostile work environment for her; or
 - e. Humiliating treatment likely to affect complainant’s health or safety.

It is immaterial whether force, inducement or threat was used or threatened to be used by a person alleged to have indulged in any of the aforesaid acts or behavior against a person.

- h. **“Workplace”** means any place that an employee is located at or visits in the course of work and includes transportation to and from such work place.
- i. **“Third Party involvement”** - Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Zircon will take all necessary and reasonable steps within the frame of Company policies to assist the affected employee in terms of support and preventive action.

4. Internal Complaints Committee (ICC):

An Internal Complaints Committee (ICC) has been constituted by the Management to consider and redress complaints of Sexual Harassment at all locations where there are a minimum 10 employees. The Chairman and Members of the Committee are as follows:

Internal Complaints Committee – 05 members of which minimum 03 will be women

1. Ms. Chairperson – the Presiding Officer of such Committee – a woman employed at a senior level in the Company.
2. Ms. Member – an employee of the Company preferably committed to the cause of women
3. Ms. Member – employee of the Company preferably committed to the cause of women
4. Mr. Member – an employee/Associate of the Company preferably committed to the cause of women or who has had experience in social work or has legal knowledge;

A quorum of minimum 03 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least 02 other members, one of whom shall be a lady.

Frequency of meetings:

The ICC Meetings will be held once every quarter, whether or not a case of sexual harassment has been registered. This is so as to discuss and plan for preventive actions and to make recommendations to the facilitating body. The venue and the time for the meetings will be as per the decision of the members of the said Committee.

Selection of members:

Members will be selected based on their commitment and capability, sensitivity to the handling of the issue. They must be gender sensitive, conscious and compassionate individuals. They must be non-judgmental and tactful in their approach of handling such matters.

Period of membership:

Membership will be for a period of 03 years, after which a new set of members will be appointed. However few members, if willing, can continue their membership to help evolve and guide the new members.

Termination of membership:

Membership will be terminated in the event of retirement or resignation of a member from his / her post in the Organization, or if a member has been found guilty in a case of sexual harassment. Membership will also be transferred to another person after the completion of 03 years tenure.

Report:

The ICC shall submit an annual report and submit the same to the management.

Functioning:

The ICCs of all Offices will report to the Central (Zircon Group) Committee for prevention of sexual harassment.

5. Procedure for handling complaints:

Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing at hrddn@zircontech.com within three [01] months since / from the occurrence of the date of the last incident, which may be extended by the ICC for any just, proper or reasonable cause.

The Committee will maintain a register 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.

The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.

At the first meeting, 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. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady Officer for lady employees involved and a male Officer for male employees involved shall meet and record the statement.

Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Inquiry" shall be conducted and concluded.

For the purpose of making an inquiry, the ICC shall have the some powers including the below

- a) summoning and enforcing the attendance of any person and examining on oath;
- b) requiring the discovery and production of documents / records; and
- c) any other matter which may be prescribed.

In the event, the complaint does not fall under the purview of 'Sexual Harassment' or the complaint does not mean an offence of 'Sexual Harassment', the same would be dropped, closed or consigned to records after recording the reasons thereof.

In case the complaint is found to be false, or if the Complainant has knowingly made a false complaint and or has produced any forged or misleading document, evidence then the Complainant shall, be liable for appropriate disciplinary action by the Management / Employer; but mere inability to substantiate a complaint or provide adequate proof will not be held against the Complainant.

The enquiry shall ordinarily be completed within a period of 30 days of its initiation. When the inquiry is completed, the report on findings shall be sent to the Business Head / HOD / HR preferably within 10 days of such completion and a copy shall be given to the complainant and the respondent. An opportunity will also be provided to the concerned parties to make representations, if any, to the Committee if either or both do not agree with the findings.

6. Recommendations by the ICC:

If the allegations are not proven, no action will be recommended by the ICC.

In case proven and the ICC concludes that there is some basis for the complaint, it shall recommend the following to the Management / Employer to effect action:

1. If the Respondent is found guilty, no recognized victim will be forced to work under or with that person. If such a provision requires the transferring of people, the victim's preferences should take priority.
2. If the Committee reaches a verdict of guilty against the Respondent it must then decide upon Immediate termination from the duty.

• Minor Penalties:

- a. The respondent is required to write a letter of apology to the victim;
- b. Management writes a letter of reprimand to the Respondent including a warning against any such further activity;
- c. Respondent is suspended without pay;
- d. Management withholds the increment from Respondent for an year;
- e. The Respondent is fined with an amount which will depend, vary keeping in view all or any of following –
 - the mental trauma, pain, suffering and emotional distress,
 - the loss in the career opportunity due to the incident,
 - medical expenses incurred by the Complainant for physical or psychiatric treatment,
 - the income and the financial status of the Respondent,
 - the feasibility of such payment.

• Major Penalties:

- a. Management terminates employment of the Respondent;
- d. If the Respondent is a service taker or third party, Management shall terminate the Contract of / with the Respondent;

7. Preventive Action:

Preventive action will be taken so as to evade any instances of sexual harassment. The efforts of the Management / Company's HR will be as follows:

Gender sensitization workshops:

Gender sensitization workshops for employees at all levels shall be conducted. These workshops will aim at eliminating any gender biases of individuals, making them more gender conscious and sensitive.

Workshops on Sexual Harassment at the workplace:

Such workshops will be conducted to induct staff about the issue of Sexual harassment at the workplace, Organizational policy on sexual harassment at the work place.

8. Prohibition of publication or making known contents of complaint and inquiry proceedings:

The contents of the complaint, the identity and addresses of the complainant, respondent and witnesses, any information related to conciliation and inquiry proceedings, recommendations and the action taken shall not be published, communicated or made known to the public, press and or media in any manner;

Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars intended to lead to the identification of the aggrieved or witnesses.

If any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendation or action to be taken, breaches the Policy, such a person shall be liable for action so decided by the Management.

9. Protection against victimization:

Zircon Technologies India Ltd will ensure that any person who has lodged a complaint in good faith is protected and not victimized. If for any reason, the complainant is victimized, it will be treated as a serious offence with suitable disciplinary action and punishment against the perpetrator.

10. Obligation of the Management Employer:

The Management / Employer will provide all necessary assistance towards ensuring full, effective and speedy implementation of this Policy.

11. Modifications:

Management / Employer reserve to itself the right to review, amend, modify or terminate this Policy at any time without prior notice.


Authorized Signatory

ZIRCON TECHNOLOGIES (INDIA) LIMITED
INTERNAL COMPLAINT COMMITTEE

| S. NO | DESIGNATION | NAME | PHONE NO. |
|-------|-------------------|---------------------|------------|
| 1. | Chairperson | Mrs. Shalini Chadha | 7300777560 |
| 2. | Presiding officer | Mrs. Diksha Uniyal | 8171989153 |
| 3. | Member | Mr. Bhaskar Joshi | 9997630193 |
| 4. | Member | Mrs. Harleen Kaur | 7302255758 |
| 5. | Member | Mrs. Pooja Negi | 7300777565 |
| 6. | Member | Mr. Ranjan Bisht | 7060002733 |

By:-

The Management

ZIRCON TECHNOLOGIES (INDIA) LTD.

