

Prevention of Sexual Harassment at Workplace Policy

Policy Owner	Human Resources
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Policy Reviewed by:	Policy Approved by:
Salamrit Virk (External Member, IC Committee)	Ruhie Pande – Group Chief Human Resources Officer

A. The Policy

1. Applicability

The Prevention of Sexual Harassment at Workplace Policy is applicable to all the Associates of Sterlite Electric, its subsidiaries and its affiliates (together called “Sterlite”). This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter the “Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

This policy applies to all allegations of sexual harassment made by anyone against an associate irrespective of whether sexual harassment is alleged to have taken place within the Company premises or in any other place visited by such associate for work.

2. Objective and Purpose

Sterlite is committed to providing to all its associates an environment free of harassment. Sterlite has zero tolerance for harassment, intimidation or humiliation of a sexual or gender-based nature in its workplace and is dedicated to ensure enactment, observance and adherence of guidelines and best practices that prevent and prosecute acts of sexual harassment. The policy is gender agnostic and aims to cover all associates, immaterial of the gender or background they hail from.

3. Definitions

- a) “Aggrieved Person” means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- b) “Respondent” means a person against whom the aggrieved person has made a complaint.
- c) “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favors; or
 - iii. Making Sexually colored remarks; or
 - iv. Showing pornography or other offensive or derogatory pictures, cartoons,

representations, graphics, pamphlets or sayings; or

v. Any other unwelcome physical, verbal or *non* - verbal conduct of sexual nature.

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment.

- i. implied or explicit promise of preferential treatment in their employment.
- ii. implied or explicit threat of detrimental treatment in their employment.
- iii. implied or explicit threat about their present or future employment status.
- iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- v. humiliating treatment likely to affect the health and safety of the aggrieved persons.

In addition to the instances mentioned hereinabove, any other acts or behavior, which whether explicit or implied, or perceived as unwelcomed and / or outrages the modesty of an employee, will be considered as sexual harassment.

d) “workplace” includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit including virtual office spaces and environment. Any place visited by the employee arising out of or during employment including transportation provided by the employer for undertaking such journey or places of accommodation or transit connected therein.

B. The Internal Committee

1. Constitution

The Internal Committee chaired by the Presiding Officer is constituted as prescribed by the Act and nominated by the Company. All the allegation of Sexual Harassment will be reviewed and investigated by the Internal Committee. The names of the Members of the Internal Committee are listed in *Annexure A* of this Policy and any change in such composition shall be in effect in the policy.

The Presiding Officer and every member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer. The IC will be provided with necessary training inputs to handle such issues effectively and with the required sensitivity and concern.

2. Responsibility

The Internal Committee is responsible for:

- a) Investigating every formal written complaint of sexual harassment.
- b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- c) Discouraging and preventing employment-related sexual harassment.

3. Complaint Reporting Mechanism

- a) **Filing of a complaint-** If any associate believes that he/she has been subjected to Sexual Harassment, such person may file a complaint with any member of IC.

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace. The complaint must be lodged within 3 months from the date of incident/ last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the complainant for making the complaint in writing.

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the IC immediately.

- b) **Conciliation** - The Internal Committee may, before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, IC shall ensure that:

- i) Monetary settlement will not be made as a basis of conciliation.
- ii) Where a settlement has been reached, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

Where a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted

by the Internal Committee.

c) **During Investigation** - The Internal Committee may during Sexual Harassment investigation may exercise the power of a civil court, vested in it, in respect of:

- i) summoning and enforcing the attendance of any person and examining him under oath;
- ii) requiring discovery and production of documents;
- iii) any other prescribed matter.

During such enquiry, upon written request by the aggrieved person or on a case-to-case basis, the committee may at its discretion recommend:

- i) to transfer the aggrieved person or the respondent to any other workplace;
- ii) grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled.

Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the workplace.

4. Action

a) The Committee is required to complete the inquiry within a time of ninety (90) days from the date on which the Complaint is filed by the Complainant. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.

b) If the allegation against the respondent has not been substantiated, the Committee may recommend that no action needs to be taken in the matter.

c) If the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, or if such complaint is proved to be false or malicious, it shall recommend to take action for sexual harassment as a misconduct. The same recommendation shall apply in the event any witness gives false evidence during any investigation.

d) Such action will be taken within 60 days of the receipt of report.

C. Confidentiality

It is a mandatory requirement that all complaints of sexual harassment at work are subject to strictest confidentiality. Accordingly, the Internal Committee, the Complainant, the Respondent and any witnesses interviewed by the Internal Committee must maintain full confidentiality of all matters relating to the Complaint as well as the enquiry proceedings. The Company shall ensure that this confidentiality obligation is enforced and any violation of the same results in appropriate action against the defaulting person.

D. Retaliation and Protection under victimization

a) In the event the Respondent is the Complainant's supervisor, the Company shall, during the

pendency of the Complaint, ensure that the reporting relationship is suspended, and that the Complainant is not subject to appraisal by the Respondent.

b) The Company shall strictly prohibit any sort of retaliation against the Complainant or any witnesses. Any act of retaliation, including internal interference, pressure and restraint, by the Respondent, whether directly or indirectly, will result in appropriate action against the Respondent.

c) Where the Respondent is an outsider, during the pendency of the investigation of the Complaint and even thereafter, if found guilty, the Respondent shall not be allowed to enter the Company premises except for the purpose of attending the Internal Committee proceedings.

d) In the event of the Respondent and the Complainant both being employees of the Company, and the Respondent is found to be guilty, irrespective of the penalty imposed, the Company shall ensure that the respondent shall not perform and write the appraisal of the Complainant, if he is otherwise so authorized.

E. POSH Timelines and Governance

SLA – 90 Days	Process Steps	Accountability
Day 0	Day 0: *POSH Complaint received by IC or WB mechanism	Internal Committee
Day 0-1	Inform Presiding Officer	Any IC Rep/Internal BU
Day 1 – 7	Day 1: IC commences the investigation - - Before initiating the investigation, IC may request the aggrieved party to settle the matter with the respondent through reconciling - If yes, ICC to record the settlement and forward report to Employer - Else, ICC to send one copy of complain to the respondent in 7 working days	Internal Complaints Committee (Presiding Officer)
Day 8 – 18	File reply on enquiry generated, within 10 working days from the date of receipt of complaint	Respondent
Day 19 – 90	ICC to investigate the complaint and complete the findings, in accordance with the principles of natural justice within 90 days (starting the date of complaint)	ICC
	ICC to submit report to the Employer (BU CEO and Group MD), within 10 days from the date of completion of enquiry	Internal Complaints Committee (Presiding Officer)
	Completion of Inquiry	Within 90 days
	Submission of Report by ICC/LCC to employer / DO	Within 10 days of completion of inquiry
	Implementation of Recommendations	Within 60 days
	Appeal	Within 90 days of the Recommendation

F. FAQs

1. Who all can complaint as per the policy?

Any associate working or visiting any workplace - Regular employee, Temporary employee, Adhoc, Daily wages who are engaged directly or indirectly (contractor) and working for remuneration, voluntary or otherwise wherein terms of employment may be express or implied. Complainant could be a co-worker, contract worker, probationer, trainee, apprentice, visitor.

2. Will the respondent be given fair opportunity to be heard?

The IC follows the Principle of Natural Justice while investigating and disposing of the matters before it. The Act makes it expressly clear that the committee shall observe the principles of natural justice when inquiring into complaints of sexual harassment. The rules provide for some basic procedure to be followed and leaves out the other parts to the common sense of the committee to act fairly and do justice.

3. If I am not subject of any harassment but have observed objectionable behavior at one team offsite/party, should I escalate it to my reporting manager?

You should report the concern to any member of IC even if you are not subjected to harassment directly but observed any inappropriate behavior at a workplace or venue where the presence is purely _____ because _____ of _____ work

Internal Complaints Committee (Members of the APEX Group)

S.N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite/ Resonia/ Serentica locations, Ed. India	9820694758
2	Ruhie Pande	Presiding Officer	ruhie.pande@sterlite.com	All Sterlite/Resonia/Serentica locations	9930250226
3	Sumil Mathur	Member	sumil.mathur@sterlite.com	All Sterlite/ Resonia/ Serentica locations	9871269191
4	Shruti Jain	Member	shruti.jain@sterlite.com	All Sterlite/ Resonia/ Serentica locations	9833945540
5	Prashant Sinha	Member	prashant.sinha@resonia.com	All Sterlite/ Resonia/ Serentica locations	9167606656

Internal Complaints Committee (Sterlite Electric – Mumbai+ Ed India)

S.N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite locations, Ed. India	9820694758
2	Shruti Jain	Presiding Officer	shruti.jain@sterlite.com	SEL – West (Mumbai, Ed India)	9833945540
3	Karandeep Singh	Member	karandeep.singh@sterlite.com	SEL – West (Mumbai, Ed India)	9987548113
4	Dr. Shubha Raina	Member	shubha.raina@sterliteelectric.in	SEL – West (Mumbai, Ed India)	9769829570
5	Antony Nellissery	Member	antony.nellissery@sterlite.com	SPTL – West (Mumbai, Ed India)	9910064335

Internal Committee (Sterlite Electric – Gurugram)

S.N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite locations	9820694758
2	Pooja Khanna	Presiding Officer	pooja.khanna@sterlite.com	SEL - Gurugram	9811276318
3	Namrata Mehra	Member	namrata.mehra1@sterlite.com	SEL – Gurugram	9619105796
4	Saurabh Sinha	Member	saurabh.sinha@sterlite.com	SEL – Gurugram	9810625538
5	Pankaj Kumar	Member	pankaj.kumar9@sterlite.com	SEL - Gurugram	7353303131
6	Archana Srivastava	Member	archana.srivastava@sterlite.com	SEL- Gurugram	7722080021
7	Aruna Ghanghoria	Member	aruna.ghanghoria@sterlite.com	SEL - Gurugram	9716266439

Internal Committee (Sterlite Electric - Jharsuguda, Odisha)

S.N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite locations	9820694758
2	Sejal Amlani	Presiding Officer	sejal.amlani@sterlite.com	All SEL Plants	9820536535
3	Pooja Khanna	Member	pooja.khanna@sterlite.com	All SEL Plants	9811276318
4	Dr. Shubha Raina	Member	shubha.raina@sterliteelectric.in	All SEL Plants	9769829570
5	Narendra Dhal	Member	narendra.dhal@sterlite.com	Jharsuguda	7894415281
6	Ankit Sabharwal	Member	ankit.sabharwal@sterlite.com	Jharsuguda	9810292502

Internal Committee (Sterlite Electric - Dadra & Nagar Haveli)

S.N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite locations	9820694758
2	Sejal Amlani	Presiding Officer	sejal.amlani@sterlite.com	All SEL Plants	9820536535
3	Pooja Khanna	Member	pooja.khanna@sterlite.com	All SEL Plants	9811276318
4	Dr. Shubha Raina	Member	shubha.raina@sterliteelectric.in	All SEL Plants	9769829570
5	Mebin Dominic	Member	mebin.dominic@sterlite.com	Dadra & Nagar Haveli	7798390676
6	Ankit Sabharwal	Member	ankit.sabharwal@sterlite.com	Dadra & Nagar Haveli	9810292502

Internal Committee (Sterlite Electric - Haridwar, Uttarakhand)

S.N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite locations	9820694758
2	Sejal Amlani	Presiding Officer	sejal.amlani@sterlite.com	All SEL Plants	9820536535
3	Pooja Khanna	Member	pooja.khanna@sterlite.com	All SEL Plants	9811276318
4	Dr. Shubha Raina	Member	shubha.raina@sterliteelectric.in	All SEL Plants	9769829570
5	Rajesh Gulati	Member	rajesh.gulati@sterlite.com	Haridwar	7088000484
6	Urvashi Jindal	Member	urvashi.jindal@sterlite.com	Haridwar	9557012132



Internal Committee (Sterlite Electric - Vadodara, Gujarat)

S. N	Name	Designation	Email ID	Location	Contact
1	Raheen Jummani	External Member	raheenjummani@gmail.com	All Sterlite locations	9820694758
2	Sejal Amlani	Presiding Officer	sejal.amlani@sterlite.com	All SEL locations	9820536535
3	Pooja Khanna	Member	pooja.khanna@sterlite.com	All SEL locations	9811276318
4	Dr. Shubha Raina	Member	shubha.raina@sterliteelectric.in	All SEL locations	9769829570
5	Anandhakrishnan K M	Member	anandha.km@sterlite.com	Vadodara	6292243224

Complaints may also be filed at SHEBox Portal, Government of India - <https://shebox.wcd.gov.in/>

Please note that the IC will get revised periodically and will abide by the standard guideline(s) as mentioned by the POSH Act.
