

Policy on Prevention of Sexual Harassment

1. Commitment:

Shree Digvijay Cement Company Limited (SDCCL) is committed to provide a work environment that ensures every woman employee is treated with dignity and respect and afforded equitable treatment.

SDCCL is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity and is treated with dignity and respect together with providing equitable treatment.

SDCCL will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.

The objective is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith. With this objective, Company has formulated this Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace ("**Policy**").

2. Applicability and Scope:

This Policy applies to all categories of employees of the Company at all its workplace, including:

- a) all associates of the Company including those employed on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, whether for the remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied.
- b) The policy also extends to those who are not employees of the Company, such as customers, visitors, vendors, suppliers, contract worker, probationer, trainee, apprentice or called by any other such name, but are subjected to sexual harassment at the workplace of the Company.
- c) This policy will be applicable for employees working in SDCCL Public School and other organization under the supervision / control of SDCCL Management.

The workplace includes:

- a) All offices or other premises where the Company business is conducted.
- b) All company-related activities performed at any other site away from the Company premises, including Marketing Offices & Mines Establishment.
- c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d) Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

3. Definition of Sexual Harassment:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

- a. unwelcome sexual advances (verbal, visual, written or physical),

- b. demand or request for sexual favours,
- c. any other type of sexually-oriented conduct,
- d. verbal abuse or “joking” that is sex-oriented,

3. Responsibilities Regarding Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

4. Complaints Committee:

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with Rules made thereunder (“Act”) provides, inter alia, for constitution of internal complaints committee, which is an internal robust mechanism for redressing complaints of sexual harassment in a workplace. The Company has, accordingly instituted an Internal Complaints Committee (ICC) as per Appendix 1 for redressal of sexual harassment complaint, made by the victim, and for ensuring time bound mitigation of such complaints and also for prevention of incidents of sexual harassment at work place(s).

The Complaints Committee or ICC is responsible for:

- Investigating every formal written complaint of sexual harassment at work place
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment at work place
- Discouraging and preventing the incidents of sexual harassment at work place.
- For carrying out any other function or role as may be applicable under the Act.

Procedures for resolution, settlement or prosecution of acts of Sexual Harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

1. Formal Resolution Options:

When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Complaints Committee for redressal of her grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

- a. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 30 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose her name, department, division and location she is working in, to enable the Presiding Officer to contact her and take the matter forward.

- b. The Presiding Officer of the Complaints Committee shall within 30 days from receipt of the complaint will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, she/he will record this finding with reasons and communicate the same to the complainant.
- c. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Complaints Committee.
- d. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- e. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Presiding Officer as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Presiding Officer will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- i. Formal apology
- ii. Counselling
- iii. Written warning to perpetrator & a copy of it maintained in the employee's file.
- iv. Change of work assignment / transfer for either the perpetrator or the victim.
- v. Suspension or termination of services of the employee found guilty of the offence
- f. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

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.

Protection to Complainant / Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to strict & exemplary disciplinary action.

False or Malicious Complaint

(i) Where the Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved or any other person making the complaint has produced any forged or misleading document, the Complainant shall, be liable for appropriate disciplinary action by the Board of Directors. Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. Provided further that the malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

(ii) Where the Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Board of Directors to take necessary actions in this regard. In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Appendix 1

The policy on prevention of sexual harassment at workplace provides for constitution of Internal Complaints Committee (ICC), vide clause 5 of Policy. Accordingly, current composition of ICC, as constituted by an order from CEO & Managing Director, effective from 23rd September, 2019 is as follows:

Sr. No.	Position	Name	Designation
1.	Presiding Officer	Dr. Nilam Adhikari	DGM
2.	Member	Ms. Nirmala Lugun	Sr. Manager
3.	External Independent Member	Ms. Jinal Keval Momaya	External Independent Member
4.	Member	Ms. Nivedita Mishra	Sr. Teacher (SDCCL Public School)
5.	Member	Mr. Thiyaku Narayanasamy	Plant Head
6.	Member	Dr. Girish Mehta	Head - Logistics & Mineral Resources Management
7.	Member	Mr. Suresh Meher	Head - HR & Legal and CS

- Note: ICC, if required to be constituted, for other location will have at least one member / employee from that location to be co-opted.
- In addition to above, the aggrieved person's head may be invited on case to case basis.

Appendix 2

The process flow for the resolution of complaint shall be as per the process laid down in the policy, given herein below:

