

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. Objective

PI Industries Limited (hereinafter referred as to 'PI' or 'Company') is committed to provide a healthy, safe and conducive work environment to its employees. In continuation with this, our endeavour is to ensure a workplace free from harassment of any kind & form including sexual harassment.

For this purpose, Policy for Prevention of Sexual Harassment has been formulated to prohibit and prevent any act of sexual harassment at workplace; and also to redress any complaint filed by any of its employees for sexual harassment and for matters connected therewith or incidental thereto.

2. Scope

This Policy applies to all the employees of Company and its Indian subsidiaries irrespective of whether they are permanent or temporary employees.

Non-employees: The Policy is also applicable on probationers, trainees, business associates, contract workers, consultants.

Third Parties: This Policy also covers all service providers, suppliers, vendors, agents, contractors, and customers who do business with us.

In addition to the above, in case an act of sexual harassment is committed by an employee of Company against any visitor, any customer or any other person at workplace, the Company shall take all the necessary steps to assist the affected person in terms of support and redressal, as appropriate.

3. Definitions

- a) **Aggrieved person:** Any person who raises a complaint of sexual harassment. Also, referred herein as 'Complainant'.
- b) **Respondent:** Any person against whom Aggrieved Person has complained under this Policy. For the sake of clarity in sub-clause a) and b) , person would include any one associated, employed or engaged with the Company and also includes person visiting the Company.
- c) **Sexual Harassment:** Sexual Harassment includes anyone or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:
 - i. Physical contact and advances
 - ii. Demand or request for sexual favours
 - iii. Making sexually coloured remarks
 - iv. Showing pornography (sms/email/using company network)
 - v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances may also amount to sexual harassment:

- i. Implied or explicit promise of preferential treatment in employment; or
- ii. Implied or explicit threat of detrimental treatment in employment; or
- iii. Implied or explicit threat about present or future employment status; or

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- iv. Interference with work or creating an intimidating or offensive or hostile work environment; or
 - v. Humiliating treatment likely to affect the health or safety.
- d) **Workplace:** All offices, sites, factories or other premises where the Company's business is conducted including transportation provided by the Company for undertaking such journey.
- a) All company-related activities performed at any other premises away from the company's premises
 - b) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations

4. 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:

- i. Reinforce the maintenance of a work environment free from sexual harassment
- ii. Supporting the person to reject unwelcome behaviour
- iii. Acting as a witness if the person being harassed decides to lodge a complaint

5. Internal Complaints Committee (ICC)

The Company has constituted an Internal Complaints Committee for redressal of sexual harassment complaints (filed by victim) and for ensuring time bound redressal of complaints received under this policy.

Composition: The Internal Complaints Committee details are as below

S. No.	Name	Position	E-mail id	Location
1.	Shilpa Sachdeva Bhullar	Chairperson	shilpa.sachdeva@piind.com	All
2.	Abira Bhattacharjee	Member	abira.bhattacharjee@piind.com	All
3.	Swapna Sundar	External	swapna@kelphr.com	All
4.	Balsubramaniam A.	Member	bala.aiyaswamy@piind.com	Gurugram & Maharashtra
5.	Anup Ranade	Member	anup.ranade@piind.com	Rajasthan
6.	Pradeep Jain	Member	pradeep.jain@piind.com	Gujarat

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Responsibilities: The Internal Complaints Committee is responsible for:

- a) Discouraging and preventing employment related sexual harassment
- b) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- c) Receiving complaints of sexual harassment at the workplace
- d) Investigating every formal written complaint of sexual harassment as per the established procedure
- e) Submitting findings and recommendations of inquiries
- f) Coordinating with the employer in implementing appropriate action
- g) Submitting annual reports in the prescribed format

Tenure Quorum: Each member of Internal Complaints Committee shall hold office for a period not exceeding 3 years from the date of nomination. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the presiding officer of Internal Complaints Committee, one member of Internal Complaints Committee and the third party representative / NGO member.

6. Procedure for Complaint

- a) Any employee, who is being sexually harassed either explicitly or implicitly, may submit a written complaint or via email (to piposh@piind.com), preferably within 3 months of occurrence of the incident.
 - i. The complaint can be in form of a letter in a sealed envelope addressed to Chairperson of Internal Complaints Committee.
 - ii. The victim is required to disclose their name, department, division and location they are working from.
 - iii. An employee can make the Complaint, orally or in writing. In case oral complaint is made, the Internal Complaints Committee member (preferably having the same gender as victim) will assist the complainant with writing the complaint.
- b) The Internal Complaints 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.
- c) Upon receiving any complaint, Internal Complaints Committee will hold a meeting with the Complainant within five (5) days of the receipt of Complainant.
- d) At the first meeting, the Internal Complaints Committee members shall hear the complainant and record allegations.
 - i. The Complainant can also submit any corroborative material with documentary proofs (photographs, emails etc. if any) to substantiate complaint.
 - ii. If the complainant does not wish to depose personally due to embarrassment of narration of event, a member of the Internal Complaints Committee having the same gender as the complaint, shall meet and record the statement.
- e) Thereafter, the Respondent is made may be called for a deposition before the Internal Complaints Committee and an opportunity will be given to him/ her to give an explanation, where after, an “enquiry” shall be conducted and concluded.
- f) 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 after recording the reasons thereof.

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- g) During the pendency of the enquiry, the Complainant can request the Internal Complaints Committee, in writing, for an interim relief. The Internal Complaints Committee shall consider and recommend suitable relief as provided by law.

7. Conciliation

- a) The Internal Complaints Committee may at the written request of the complainant take steps to settle the matter between the complainant and the respondent through conciliation. The Internal Complaints Committee would conciliate between the complainant and the alleged offender in order to redress the complainant's grievances without a formal enquiry or investigation.
- b) In case a settlement is arrived at, not being a monetary settlement:
 - i. The Internal Complaints Committee shall record the settlement and forward the same to the CPO to take action as specified in the recommendation.
 - ii. Both parties will be provided with a copy of the resolution.
 - iii. Resolution through conciliation is to happen within two (2) weeks of receipt of complaint.
 - iv. No further enquiry shall be conducted by the Internal Complaints Committee.
- c) In an event that the term or condition of the settlement arrived at under conciliation has not been complied with by the respondent, the Internal Complaints Committee shall proceed to make an enquiry into the complaint or forward the complaint to the police.

8. Procedure for Enquiry

- a) The Internal Complaints Committee shall immediately proceed with the enquiry and communicate the same to the complainant and respondent.
- b) Internal Complaints Committee shall inform the Respondent and give him/her an opportunity to submit a written explanation if he/ she so desires within seven (7) days of receipt of the same. At any stage during the course of enquiry either party may submit self-attested documents/evidences to substantiate their case.
- c) Internal Complaints Committee shall provide adequate opportunity to both the parties to present their case. However, either parties are prohibited from involving any other external agency (such as lawyers) to present themselves.
- d) If any party requires a witness to be called, the same is to be communicated to the Internal Complaints Committee in advance. The Internal Complaints Committee shall call upon the witnesses on behalf of either party for the next meeting.
- e) The Internal Complaints Committee shall provide every reasonable opportunity to the complainant and to the Respondent, for putting forward and defending their respective case.
- f) The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to Company's Chief People Officer as soon as practically possible and in any case, not later than ninety (90) days from the date of receipt of the complaint.
- g) CPO will ensure corrective action on the recommendations of the Internal Complaints Committee and keep the complainant informed of the same. Corrective action may include any of the following:
 - i. Formal Apology from the Respondent, to the complainant
 - ii. Counselling Session

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- iii. Written Warning to the perpetrator and a copy of it maintained in the Employee's file
- iv. Termination or suspension of services of the employees found guilty of the offence
- h) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by Company Chief People Officer.
- i) If the complainant has already filed a complaint with the police, the Internal Complaints Committee will still continue the internal investigation.
- j) Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable steps to assist the affected person in terms of support and preventive action.
- k) The Internal Complaints Committee shall be governed by such rules as may be framed under the Sexual Harassment of Women in the Workplace (Prevention, Prohibition and Redressal) Act, 2013.

9. False and Malicious Complaints:

- a) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by CPO per the existing Company's policy capturing the disciplinary action. This is done to prevent recurrence and others are deterred from raising complaints in bad faith.
- b) It is the responsibility of Internal Complaints Committee to consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate enquiry.

10. Confidentiality

- a) All proceedings of complaints along with the identity of the complainant and respondent will be kept confidential throughout the enquiry process. Additionally, employees involved in the enquiry process (complainant, respondent, witnesses, members of Internal Complaints Committee or any other employee) are prohibited from discussing the details of the case outside of meetings, unless required as part of the enquiry process.
- b) All the reports and documents will remain confidential with Internal Complaints Committee, except where disclosure is required as part of the process.
- c) Any person contravening the confidentiality is subject to disciplinary action as per the Sexual Harassment of Women in the Workplace (Prevention, Prohibition and Redressal) Act, 2013.

11. Appeal.

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the Internal Complaints Committee in person and the same shall be recorded. ICC Chairperson (presiding officer) shall provide a decision which shall be final and binding. If the aggrieved person or complainant is not satisfied with the decision or recommendations, they may appeal to the appellate authority in accordance with the Act, within ninety (90) days of the recommendations being communicated.

12. Compliance.

At PI, regular trainings and awareness sessions are organised to ensure that all employees understand and comply with this Policy at all times.