

**Policy of LS Industries Limited on Prevention of Sexual Harassment at Work Place**  
**(As amended on 13<sup>th</sup> February, 2020)**

<b>1</b>	<b>INTRODUCTION</b>
	<p>LS INDUSTRIES LIMITED respects the dignity of all employees working for the Company irrespective of their gender or position. In the same way, we expect responsible conduct and behavior on the part of all our employees at all levels. Providing a safe and congenial work environment to all employees is an integral part of the Company's employment policy.</p> <p>LS INDUSTRIES LIMITED is committed to providing a work environment free of sexual harassment. Sexual harassment is a form of workplace harassment of a sexual nature that affects the dignity of men and women at work.</p> <p>LS INDUSTRIES LIMITED therefore intends to form a Policy on Prevention of Sexual Harassment to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide proper procedure for the redressal of complaints pertaining to sexual harassment, if any.</p>
<b>2</b>	<b>AIM</b>
	<p>This policy has been framed with a view to:-</p> <ul style="list-style-type: none"> <li>• Promote a workplace based on equality &amp; respect.</li> <li>• Provide a safe and congenial work environment.</li> <li>• Awareness &amp; sensitization about sexual harassment at the workplace.</li> <li>• Prevent sexual harassment.</li> <li>• Provide formal and informal mechanism for redressal in case of complaint of sexual harassment at the workplace.</li> <li>• Ensure protection against reprisals to complainants, witnesses, Committee members and other employees involved in prevention and complaint resolution.</li> </ul>
<b>3</b>	<b>APPLICABILITY AND EFFECTIVE DATE</b>
	<p>This Policy shall be applicable on all the Directors, all categories of employees, workers, including casual workers, adhoc, temporary workers or contractual, trainees, apprentices, visitors of Company premises &amp; its units. It shall also include any unwelcome behaviour of a sexual nature mentioned in the policy by any Vendor/Supplier/Contractor/Business Associate including their consultants, agents, supervisors, managers, workers and their employees to any of our employees on our premises or outside on Company's duty. The Policy comes in to effect immediately.</p>

4	<b>DEFINITION OF SEXUAL HARASSMENT</b>	
		<p>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 such unwelcome sexually determined behaviour (whether direct or by implication) such as:-</p> <ol style="list-style-type: none"> <li>I. Physical contact and advances ;</li> <li>II. Demand or request for sexual favours;</li> <li>III. Making Sexually colored remarks ;</li> <li>IV. Showing pornography ;</li> <li>V. Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.</li> <li>VI. Making an unwelcome demand or request whether directly or by implication for sexual favours and/or making it a condition of employment / payment of wages / increments /promotion / preferential treatment / threat to detrimental treatment in employment / threat to current or future employment status or similar act.</li> <li>VII. Any act or conduct by a person in authority which creates the environment at workplace hostile or offensive or intimidating to a person belonging to the other sex.</li> </ol>
	<b>4A</b>	<b>WHAT IS NOT SEXUAL HARASSMENT</b>
		<p>However, <u>SEXUAL HARASSMENT DOES NOT</u> refer to normal conversation that all parties affected find acceptable. It does not refer to normal office relationships that are freely entered into without intimidation or coercion from any part. The relationship entered on the basis of free consent not obtained by any kind of fraud, coercion or undue influence, provided always that the onus of proving the consent shall always be on the party raising such defense/ground.</p>
5	<b>OTHER DEFINITIONS</b>	
	<b>5A</b>	<b>WORKPLACE</b>
		<p>Any place where working relationship and/or employer-employee relationship between the Company and the person exists or established. The workplace includes all the offices, units, branches or other premises of the Company where the Company's business is conducted. It also includes all Company related activities performed at any other site away from the Company's premises including guest houses, training rooms and any other place visited by the employees or workers arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.</p>
	<b>5B</b>	<b>AGGRIEVED WOMAN</b>
		<p>In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.</p>
	<b>5C</b>	<b>RESPONDENT</b>

		Against whom the aggrieved woman has made a complaint.
<b>6</b>		<b>THIRD PARTY HARASSMENT</b>
		Any harassment brought to the notice of the Company arising out of an act or omission by any third party or an outsider, Company will take necessary and reasonable steps in assisting the affected person in terms of support and preventive action.
<b>7</b>		<b>COMPLAINT SYSTEM</b>
		Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate Complaint Mechanism in the form of “ <b>Internal Complaint Committee</b> ” has been created in the Company for time bound redressal of the complaint made by the victim. <u>Presiding Officer/Chairperson</u> Internal Complaint Committee of LS Industries Limited SCO 191-192, Village Bairsen P.O Manjholi Tehsil Nalagarh Solan
<b>8</b>		<b>MECHANISM FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT</b>
		Whenever it happens/occurs, the Company is committed to providing a supportive environment so as to resolve the concerns & grievances of sexual harassment as under:-
	<b>8A</b>	<b>INFORMAL RESOLUTION OPTIONS</b>
		<ol style="list-style-type: none"> <li>1. 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.</li> <li>2. 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 Complaint 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.</li> <li>3. The Committee, before initiating the inquiry at the request of the aggrieved woman, will take necessary steps to settle the matter between her and the Respondent through mutual settlement. Wherever such settlement has been arrived, the said Committee shall record it and send the same to Vice President (HR) to take action as per its recommendation. Once such settlement has been arrived then no further inquiry shall be conducted by the Complaint Committee, however, a woman can further refer the same to Complaint Committee for redressal if the terms of settlement have not been complied.</li> <li>4. The Chairperson of the Committee shall ensure that the redressal of concern or grievance made under Informal Resolution Option will be made within 30 days after receiving it.</li> </ol>
	<b>8B</b>	<b>FILING OF COMPLAINTS</b>

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|  |  | <ol style="list-style-type: none"><li>1. 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 Chairperson of Complaint Committee constituted by the Management under his/her own signatures. The complaint shall have to be in writing with his/her signature within 30 days of occurrence of incident and can be in form of a letter. The employee is required to disclose her name, department, division and location she is working in, so as to enable the Chairperson or the Committee Members to contact her and take the matter forward. The Complaints Committee will render reasonable assistance to women for making the complaints in writing. This time limit may further be extended for 15 days if the Complaint Committee is satisfied that there were circumstances that prevented the woman from filing a complaint within the specified timeline.</li><li>2. 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.</li><li>3. The Committee will hold first meeting with the Complainant within 15 days of the receipt of the complaint.</li><li>4. At the first meeting, the Committee members shall hear the Complainant</li></ol> |
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		<p>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.</p> <ol style="list-style-type: none"> <li>5. 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.</li> <li>6. 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. Committee will submit its report to Vice President (HR) regarding the same with recommendations to drop the proceedings. The same will be communicated to the complainant in writing.</li> <li>7. In case the complaint is found to be false or in case the allegation made was malicious or the Complainant has produced any forged/misleading document, then the Committee will recommend appropriate disciplinary action to be taken by Vice President (HR) against the Complainant who has made said complaint.</li> </ol>
	<b>8C</b>	<b>INQUIRY PROCESS</b>
		<ol style="list-style-type: none"> <li>1. The Committee shall immediately proceed with the Inquiry and communicate the same to the Complainant and person against whom complaint is made (Respondent).</li> <li>2. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made (respondent) and give him / her an opportunity to submit a Written Explanation if she / he so desires on receipt of the same.</li> <li>3. The Complainant shall be provided with a copy of the Written Explanation submitted by the person against whom complaint is made.</li> <li>4. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.</li> <li>5. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.</li> <li>6. The Committee, if deem fit, shall call upon all witnesses mentioned by both the parties.</li> <li>7. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.</li> </ol>

		<p>8. The Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or the Respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the Chairperson. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.</p> <p>9. During the pendency of an inquiry, on a written request made by the aggrieved woman, the Committee may recommend to the Vice President (HR) to -</p> <ul style="list-style-type: none"> <li>• Transfer the aggrieved woman or person accused/(Respondent) to any other workplace;</li> <li>• Grant leave to the aggrieved woman up to the period of 3 months (over and above the entitled leave).</li> <li>• Grant such other relief to the aggrieved woman as may be prescribed</li> </ul> <p>10. The Committee shall complete the “Inquiry” within period of 90 days from the date of receipt of Complaint however the Committee is empowered to extend the period for further 30 days of completion of inquiry in deserving cases by assigning the reasons in writing and communicate its findings and its recommendations for action to the Vice President (HR). In case any employee of the HR Department or Vice President (HR) is facing allegation of sexual harassment then such report shall be submitted to one of Member of Board of Director of the Company other than member of such board Committee. The report of the Committee shall be treated as an “Inquiry Report” on the basis of which an erring employee can be awarded appropriate punishment straightaway.</p> <p>11. The Inquiry Report will be issued by the Committee within 10 days from the date of completion of inquiry.</p> <p>12. The Vice President (HR) or member of Board, as the case may be, will direct appropriate action in accordance with the recommendations proposed by the Committee within 30 days from the date of receipt of inquiry report. Although in case, the Committee arrives at the conclusion that the allegation against the Respondent has not proved then the Committee shall recommend to Vice President (HR) that no action is required to be taken in the matter and Complainant will be keep informed about the same.</p>
	<b>8D</b>	<b>DISCIPLINARY &amp; CORRECTIVE ACTIONS</b>
		<p>1. The Committee may pursuant to a finding of sexual harassment recommend to the Vice President (HR), as the case may be, action which may include:-</p> <ul style="list-style-type: none"> <li>• actions in accordance with misconduct mentioned in the service rules/appointment letter;</li> <li>• formal apology, counseling, Issue a verbal or written warning, temporary suspension/dismissal;</li> <li>• transfer, permanent termination of employment, temporary termination of employment, punitive without pay leave for such period as may be deem</li> </ul>

		<p>reasonable in facts of case;</p> <ul style="list-style-type: none"> <li>• any other appropriate disciplinary action as may be deem fit by the Company considering the facts of case.</li> </ul> <p>2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.</p> <p>3. Vice President (HR) will ensure corrective action on the recommendations of the Complaints Committee and keep the Complainant informed of the same with in a period of 30 days from the date of receipt of report of Complaint Committee.</p> <p>4. The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to HR Department of Company.</p> <p>5. In case the Committee find the degree of offence coverable or falls under the preview of Indian Penal Code, then this fact may be mentioned in its report and appropriate action may be initiated by the Management with in a period of 30 days from the date of receipt of report of Complaint Committee, for making a Police Complaint or other remedial or necessary legal proceedings and such decision shall be without prejudice to the right of the complainant as may be available under laws of land.</p>
<b>9</b>		<b>CONFIDENTIALITY</b>
		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. Company is Committed to protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, also the confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.
<b>10</b>		<b>ACCESS TO REPORTS AND DOCUMENTS</b>
		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. The Committee will also maintain proper records for all the meetings, informations, findings, reports etc. relating to the inquiries made or cases reported to it during each calendar year and will submit the same to the Appropriate Authorities in prescribed format as per applicable requirements.
<b>11</b>		<b>PROTECTION TO COMPLAINANT/ VICTIM</b>
		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 victim or witnesses are not victimized or discriminated against 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 disciplinary action.
<b>12</b>		<b>ATTENTION</b>
		The Internal Complaint Committees shall not entertain any anonymous complaints.

		<b>CONCLUSION</b>
		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.

**Foot Notes:-**

1. Originally applicable w.e.f. 28<sup>th</sup> May, 2014
2. 01<sup>st</sup> Amendment on 13<sup>th</sup> February, 2020