

**Prevention of Sexual Harassment Policy**

DOC. NO.: POLICY/HR/005
ISSUE NO.: 01
REV. NO.: 00
EFFECTIVE DATE: 01.07.2021

1. Purpose:

It is the organization's policy to promote a culture that is free of sexual harassment or conduct that might reasonably be perceived as constituting sexual harassment or creating / contributing to a sexually hostile environment. Each individual has the right to participate in a professional atmosphere, which promotes equal opportunities and prohibits discriminatory practices, including sexual harassment. At LEI INDIA PVT. LTD, sexual harassment, whether verbal, physical or environmental, is unacceptable and will not be tolerated. We believe that it is necessary and expedient for employers in work places as well as other responsible persons or institutions to observe certain guidelines to ensure the prevention of sexual harassment of women.

- 2. Scope:** This policy is applicable to all on-roll, full-time positions. This policy is applicable to all existing locations of LEI INDIA PVT. LTD and any future plant units or offices that might come up. This policy comes into effect on **1st July, 2021**.

3. Procedure:**3.1. Sexual Harassment** has been defined as:

"Unwelcome sexually determined behavior (whether directly or by implication) such as:

- a) Physical contact and advances,
- b) Demand or request for sexual favors,
- c) Sexually colored remarks,
- d) Showing pornography, or
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature, in circumstances which give rise to a reasonable apprehension that such conduct would disadvantage / humiliate the victim or would pose a safety / health hazard to her, in connection with her employment or work.

3.2. Preventive Steps:

- a) Consistent with the existing law LEI INDIA PVT. LTD has taken all reasonable steps to ensure prevention of sexual harassment at work. Such steps include:
- b) Circulation of LEI INDIA PVT. LTD's policy in English / Hindi in offices on sexual harassment to all persons employed by or in any way acting in connection with the work and/or functioning of LEI INDIA PVT. LTD.
- c) Sexual harassment is affirmatively discussed at monthly meetings, workshops etc.,
- d) Conduct or cause to carry out in-house training on sexual harassment and addressing complaints to staff as well as members of the LEI INDIA PVT. LTD POSH Committee.
- e) Guidelines have been prominently displayed to create awareness of the rights of female employees.
- f) LEI INDIA PVT. LTD has widely publicized that the Sexual Harassment is a crime & will not be tolerated.
- g) Names and contact numbers of members of the complaint's committee will be prominently displayed in all the offices.

Prevention of Sexual Harassment Policy

DOC. NO.: POLICY/HR/005

ISSUE NO.: 01

REV. NO.: 00

EFFECTIVE DATE: 01.07.2021

3.3. If you are being harassed:

- Tell the harasser his / her behavior is unwelcome and ask him / her to stop.
- Keep a record of incidents (date, time, locations, possible witnesses, what happened, your response).
- You do not have to have a record of events in order to file a complaint, but a record can strengthen your case & help you remember details over time.

3.4. POSH Committee:

- If an individual believes he or she is the victim of sexual harassment or retaliation, he or she is encouraged to report such complaint immediately. Keeping the above guidelines in mind a POSH Committee has been established. The Management has designated the POSH Committee to receive all complaints, verbal or written, of harassment on behalf of the organization.
- The POSH Committee constituted will be appointed for a period of one year.
- A complaint may be lodged with POSH Committee at the earliest point of time and in any case within 15 days of occurrence of the alleged incident.
- The complaint may be lodged via an E-mail or hand written. This can be along with the verbal complaint.
- The complaint shall contain all the material & relevant details concerning the alleged Sexual Harassment.
- If the complainant feels that he or she cannot disclose his/ her identity for any reason, the complainant shall address the complaint to the Chairperson of the Complaint's Committee & hand over the same in person or in a sealed cover.
- The Chairperson of the Complaint's Committee shall retain the original complaint with her & send to the other members of the Complaint's Committee a gist of the complaint containing all material & relevant details of the complainant.

3.5. Complaint's Committee Members:

Sr. No.	Location	Unit	POSH Role	Name	Designation
1	Manufacturing Site	LEI INDIA PVT. LTD	Chairperson		
			Male Member		
			Female Member 1		
			Female Member 2		

- The Committee will take all reasonable steps to prevent harassment from occurring and will take immediate and appropriate action when the Committee knows that unlawful harassment has occurred.
- If you have been harassed by a co-worker, reporting manager, agent, vendor or client, or if you believe that another employee has been harassed, you have a duty to promptly report the facts of the incident or incidents, and names of the individuals involved, to the Chairperson of the POSH Committee.

Prevention of Sexual Harassment Policy**DOC. NO.: POLICY/HR/005****ISSUE NO.: 01****REV. NO.: 00****EFFECTIVE DATE: 01.07.2021**

- a. The matter will be immediately and thoroughly investigated, and confidentiality will be maintained to the extent possible. After reviewing the evidence, a determination will be made concerning whether reasonable.

3.6. Code of Conduct for LEI INDIA PVT. LTD Anti-Sexual Harassment Committee:

- a) Listen to the charge. Don't make comments like, "You're overreacting."
- b) Do not blame the employee for the conduct that occurred or ask what he or she did to encourage it.
- c) Acknowledge that bringing a harassment complaint is a difficult thing to do.
- d) Maintain a professional attitude.
- e) Gather the facts; don't be judgmental. Do not assume the complaining employee's story lacks merit. Do not assume the alleged harasser is guilty.
- f) Ask who, what, when, where, why, and how. Find out if the employee is afraid of retaliation.
- g) How does the employee want the problem resolved?
- h) Take all complaints seriously and listen actively.
- i) The Committee shall ensure that a fair and just investigation is undertaken immediately. Delaying or extending an investigation can make witness testimony increasingly unreliable
- j) The manner in which the investigation is handled can itself furnish grounds for a hostile environment claim, so carefully document every step.
- k) If there is more than one allegation, treat each separately.
- l) Find out whether there was a pattern of previous episodes or similar behavior toward another employee.
- m) Prepare a detailed chronology.
- n) Don't make any statements about the accused employee's character, job performance, or family life.
- o) Identify the relationship of the accused to the complainant.
- p) Obtain statements from any witness who supports or denies any of the complainant's allegations. Be aware that witnesses are often reluctant to come forward out of fear of reprisal.
- q) The personal life of the complainant is not relevant to any inquiry.
- r) Oral complaints to be reproduced in writing. It shall be the duty of the Authority/ person before whom an oral complaint is made to reduce the said complaint in writing and read out the complaint to the complainant in the language requested by the complainant and obtains the signature of the complainant.
- s) Provisions relating to conducting of inquiry shall govern and prevail, in the procedures of existing Acts, Rules and governing procedures in dealing with conducting of an inquiry into cases of sexual harassment.
- t) No decision shall be taken by the Committee against anyone without giving the opportunity of hearing.
- u) A complaint relating to sexual harassment shall ordinarily be preferred within one month from the date of the alleged offense and the delay, if any, in preferring such complaint may be condoned, provided that the complainant submits sufficient cause for such delay.

**Prevention of Sexual Harassment Policy****DOC. NO.: POLICY/HR/005****ISSUE NO.: 01****REV. NO.: 00****EFFECTIVE DATE: 01.07.2021**

- v) The investigation shall be completed within 3 months of the receipt of the complaint.
- w) Any perceived delay in filing a complaint, by itself, shall not be a relevant factor in deciding the veracity of the complaint or in appreciating the evidence presented.
- x) If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.
- y) All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.
- z) **Protection against retaliation:** Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

3.7. Code of Conduct for Employees at LEI INDIA PVT. LTD:

- a) Employees of LEI INDIA PVT. LTD should abstain from committing any acts which amount to sexual harassment at the workplace and are encouraged to report incidents of sexual harassment without fear or favor.
- b) Head of departments, Managers, Reporting Managers are required to create appropriate working conditions in respect of work, leisure, health and ensure there is no hostile environment in the work place.
- c) Head of departments, Managers, Reporting Managers are required to report any complaint or grievance immediately to the Anti-Sexual Harassment Committee/ Core/Zonal Complaints Committee or to facilitators.
- d) It is both the duty and obligation of the HR department to provide necessary communication and training across the company, with respect to the anti-sexual harassment policy.
- e) Human Resource Department shall ensure this policy is communicated, explained and handed over at the time of induction of every employee.
- f) Human Resource in consultation with the Anti-Sexual Harassment Committee, clarifies to employees on any queries related to this policy wherever required.
- g) Human Resource shall ensure implementation of this policy in line with overall Anti-Sexual Harassment.
- h) Committee guidelines and directions. Human resources shall provide appropriate training to employees on gender sensitivity and ensure that this policy and code is communicated, explained and handed over at the time of induction of every employee.
- i) Management and reporting manager personnel must be sensitive to acts of conduct which may be considered offensive by fellow personnel and must refrain from engaging in such conduct.



LEI INDIA PRIVATE LIMITED

Prevention of Sexual Harassment Policy

DOC. NO.: POLICY/HR/005
ISSUE NO.: 01
REV. NO.: 00
EFFECTIVE DATE: 01.07.2021

- j) It is the duty of the Anti-Sexual Harassment Committee Head of departments, Managers, Reporting managers and Human Resource Department, to ensure that there is no retaliation or retribution happening against the victim, witnesses or accused at the workplace, where the supposed action is to have taken place.

4. Review Frequency

Once in a 03 Year

Date: 01 Jul, 2021

Revision No: 00

Director

LEI INDIA PVT. LTD.