

PREVENTION OF SEXUAL HARASSMENT POLICY

Prince Pipes and Fittings Limited (“PPF”) is committed to providing a safe and healthy work environment to all its employees (“Employees”) and adopts a zero-tolerance approach towards any form of sexual harassment at the workplace. PPF and its Employees have a shared responsibility in contributing to a mature and respectful work environment. In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “Act”), PPF has provided a framework to specifically deal with acts of sexual harassment at the workplace. While the Act is only intended to protect women, PPF has formulated a policy that is gender neutral and will apply uniformly in case of sexual harassment of any person, irrespective of the gender of the parties.

1. SCOPE AND APPLICABILITY

- 1.1. The scope of this policy is to prevent instances of Sexual Harassment (*defined below*) at the Workplace (*defined below*), to address complaints and provide redress, to set out procedures for resolution, settlement and/or prosecution of acts of Sexual Harassment at the Workplace. The scope of the policy extends to the entire operations of PPF and is deemed to be part of the service conditions of all Employees (*defined below*).
- 1.2. In addition to Employees, this policy shall also extend to clients, suppliers or business associates of or visitors to PPF, if the conduct occurred in the course of their work for PPF.

2. DEFINITIONS

- 2.1. “Complainant” or “Aggrieved Person” a person of any age, whether or not employed directly by PPF, who alleges to have been subjected to any act of Sexual Harassment by the Respondent at the Workplace (*defined below*).
- 2.2. “Employer” means (i) any person responsible for the management, supervision and control of the Workplace; or (ii) the relevant person discharging contractual obligations with respect to the Employees.
- 2.3. “Employee” means any person engaged at the Workplace for any work, including all regular, permanent and temporary employees of PPF, full-time or part time employees of PPF, consultants, interns, contractors, ad hoc or honorary employees, probationers, trainees, apprentices by whatever name called, whether employed for remuneration / working on a voluntary basis, or otherwise engaged either directly or through an agent, and with or without the knowledge of PPF. In case of an allegation of sexual harassment against a contractor, PPF will work with the direct employer of the alleged offender/concerned vendor or supplier to decide how the matter should be dealt with.
- 2.4. “Respondent” means a person against whom an Aggrieved Person has made a written complaint of Sexual Harassment as set forth herein.
- 2.5. “Workplace” means: (i) any office, branch, unit, department or undertaking established, owned, controlled or wholly or substantially financed directly or indirectly by PPF; (ii) any place visited by an Employee during the course of employment (such as meetings at third party premises, offsite meetings and public venues), including transportation provided by PPF for undertaking such journey; and/or (iii) any other location provided for under the Act.

3. SEXUAL HARASSMENT

- 3.1. Sexual Harassment means one or a series of incidents involving the following:

- a. physical contact and advances;
 - b. a demand or request for sexual favours;
 - c. making sexually coloured remarks;
 - d. showing pornography;
 - e. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- 3.2. The following circumstances, (among others) if they occur or are present in relation to or connected with any act or behaviour of sexual harassment may also amount to sexual harassment:
- a. Implied or explicit promise of preferential treatment in employment;
 - b. Implied or explicit threat of detrimental treatment in employment;
 - c. Implied or explicit threat about present or future employment status;
 - d. Interference with work or creating intimidating or offensive or hostile working environment;
 - e. Humiliating treatment likely to affect health or safety;
 - f. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, text messages, e-mails, gestures, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, any other communication which offends an Employee’s sensibilities and affects his/her performance at work; or
 - g. Eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy; or
 - h. Any unwelcome gesture having sexual overtones to the extent not covered above.

4. CONSTITUTION OF THE INTERNAL COMMITTEE

4.1. PPF has constituted a committee for redressal of Sexual Harassment complaints and for ensuring time bound treatment of such complaints (the “**Internal Committee**” or “**Committee**”). The Internal Committee will comprise 5 (five) members; and in no circumstance will the membership of the Committee fall below 4 (four). At least half of the members of the Committee shall be women, at all times. The Committee shall consist of the following members:

- a. a presiding officer who shall be a senior woman Employee of PPF (the “**Presiding Officer**”);
- b. not less than 2 (two) members from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c. one member from amongst non-governmental organizations or associations committed to the cause of women or an external counsel familiar with the issues relating to Sexual Harassment.

(collectively the “**Investigating Members**” and individually, an “**Investigating Member**”)

4.2. The names and contact details of the current members of the Internal Committee are set out below. Each Investigating Member shall hold office for a term of 3 (three) years (the “**Term**”) from the date of appointment of such Investigating Member. However, the Employer may temporarily extend the Term of any Investigating Member in order to dispose of any pending complaints of Sexual Harassment.

Name	Designation	E-Mail	Role in the Committee
Heena Chheda	VP - Finance	hpc@princepipes.com	Presiding Officer

Pushplata Tripathi	Manager - HR	prt@princepipes.com	Members
Chetna Phirke	Dy. Manager - HR	chp@princepipes.com	Members
Priyanka Joshi	Manager - Branding	pkj@princepipes.com	Members
Dolly James	member from non-governmental organizations	POSH@princepipes.com	Members

4.3. The Employer may remove an Investigating Member and such Investigating Member shall cease to hold office if he/she is found to have been involved in any action or situation that is immoral and unbecoming of an Employee. The following is an indicative and non-exhaustive list of situations in which an Investigating Member may be removed from office by the Employer:

- a. if an Investigating Member leaks or publishes any information regarding any Sexual Harassment complaints, including the names of the Aggrieved Person, Respondent, witnesses, etc.;
- b. if an Investigating Member is convicted of an offence or is the subject of a pending inquiry under any law;
- c. if disciplinary proceedings are pending against such Investigating Member; or
- d. if an Investigating Member has abused his/her position thereby rendering his/her continuance in office against the interests of PPF and its Employees.

4.4. The Committee is expected to provide a sound mechanism for redressal of grievances by:

- a. accepting and registering in due time, any complaint pertaining to Sexual Harassment;
- b. conducting inquiry within the specified timelines and recommending to the Employer, any action to be taken against the Respondent;
- c. recommending to the Employer, the need for medical, psychological, and emotional assistance to the Aggrieved Person, if found necessary;
- d. seeking police or legal intervention wherever necessary; and
- e. keeping the entire proceedings confidential.

4.5. The Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 in respect of the following matters, namely, summoning and enforcing the attendance of any person and examining him/her on oath, requiring the discovery and production of documents, and any other matter which may be prescribed.

4.6. The Committee shall submit an annual report to the Employer containing details of the number of complaints of Sexual Harassment received in the year, the number of complaints disposed of during the year, the number of complaints pending for more than 90 (ninety) days, the number of workshops or awareness programs against Sexual Harassment carried out and details of the action taken by the Employer after receiving the recommendations of the Committee.

4.7. It shall be the responsibility of the Committee to ensure that all allegations are dealt with timeously, with due seriousness and confidentiality; and that the allegations are dealt with in a manner which achieves a resolution of the behaviour, rather than proceeding in a mechanistic procedural manner.

5. PROCEDURE FOR RESOLUTION OF COMPLAINTS, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

5.1. Complaints

- 5.1.1. Any Employee/other person who is a victim of Sexual Harassment at the Workplace, may make a formal complaint by writing to : POSH@princepipes.com, which is accessible to all the Investigating Members. The Employee may also contact the Presiding Officer or any Investigating Member individually (contact details set out in the Appendix A). Except in case of e-mail, the Complainant/Aggrieved Person should submit 6 (six) copies of the complaint to the Committee, along with other supporting details including complete contact details of the Aggrieved Person and the name and address of witnesses, if any.
- 5.1.2. If a complaint cannot be made in writing for any reason, the Presiding Officer or any Investigating Member, as the case may be, shall render all reasonable assistance to the Aggrieved Person for making the complaint in writing. Notwithstanding the foregoing, the following designees may file a complaint on behalf of the Aggrieved Person:
- a. if the Aggrieved Person is unable to make a complaint on account of her/his physical incapacity, a complaint may be filed by: her/his relative or friend, her/his co-worker, an officer of the National Commission for Woman or State Women's Commission, or any person who has knowledge of the incident, with the written consent of the Aggrieved Person;
 - b. in the event the Aggrieved Person is unable to make the complaint on account of her/his mental incapacity, the complaint may be filed by her/his relative or friend, a special educator, a qualified psychiatrist or psychologist; the guardian or authority under whose care she/he is receiving treatment or care, or any person who has knowledge of the incident jointly with any of the foregoing persons;
 - c. where the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her/his written consent; and/or
 - d. where the Aggrieved Person is dead, a complaint may be filed by any person who has knowledge of the incident with the written consent of her/his legal heir.
- 5.1.3. The complaint should be made within 3 (three) months from the date of occurrence of the alleged incident and in case of series of incidents, within a period of 3 (three) months from the date of the last incident. The Internal Committee may, at its sole discretion, extend this time limit by upto 3 (three) more months if it is satisfied that the circumstances were such which prevented the Complainant from filing the complaint within a period of 3 (three) months.

5.2. **Further action on the complaint**

5.2.1. *Conciliation*

- a. The Internal Committee may, before initiating an inquiry and at the request of the Aggrieved Person, take steps to settle the matter between the Aggrieved Person and the Respondent through conciliation, provided that no monetary settlement shall form the basis of such conciliation.
- b. Where a settlement has been arrived at, the Internal Committee shall record the terms of the same, and forward it to PPF to take any action as may be specified in the recommendation. The Aggrieved Person and the Respondent shall also receive copies of the settlement.
- c. Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.
- d. Where the Aggrieved Person subsequently informs the Internal Committee that any term or condition of the settlement arrived at has not been complied with by the Respondent, or if the Aggrieved Person does not request for conciliation, or if the conciliation process

fails, the Internal Committee will proceed to make an inquiry into the complaint in accordance with the provisions of this policy.

5.2.2. *Inquiry*

- a. After receiving a written complaint, the Committee shall, within a period of 7 (seven) working days from the date of receipt, send 1 (one) copy of the complaint to the Respondent. The Committee shall give an opportunity to the Respondent to submit a written explanation (if the Respondent so desires) within a period of 10 (ten) working days from the date of receipt of the complaint and supporting documents.
- b. The Complainant will be provided with a copy of the written explanation submitted by the Respondent.
- c. If the Complainant or the Respondent desire to lead any evidence and/or require any witness/es to be called, they shall communicate in writing to the Committee, the names of such witness/es whom they propose to examine, after which the Presiding Officer will summon the said witness(es).
- d. If the Complainant or the Respondent desire to tender any documents by way of evidence before the Committee, she/he shall supply copies of such documents to the Committee as well as the other party.
- e. The meetings of the Committee will be at such locations as may be decided by the Committee keeping in view the need to maintain confidentiality of the investigation. However, the convenience of the Complainant/Aggrieved Person will also be taken into consideration. At all meetings of the Committee, a minimum of 3 Investigating Members shall be present, including the Presiding Officer.
- f. The Committee shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice, and during the course of inquiry, the Committee shall provide the Complainant and the Respondent and the relevant witness, with the opportunity of being heard.
- g. For the purpose of conducting and completing an inquiry, the Presiding Officer of the Committee may convene such number of hearings as may be deemed necessary in order to dispose of the complaint. Notice of such hearings shall be given to all persons who are required to be present, at least 3 (three) days before such hearing is scheduled to take place. Both the Respondent and the Complainant (unless specifically exempted by the Internal Committee in writing) shall be required to attend every hearing. If either party fails to attend 3 (three) consecutive hearings without sufficient cause, the Internal Committee may terminate the inquiry or pass an ex parte order. However, such an ex parte decision/recommendation may not be passed without giving a 15 (fifteen) day written notice in advance to the concerned parties.
- h. If the Committee so desires, both parties can be heard separately.
- i. If the Complainant is a third party and does not agree for a personal appearance before the Committee due to any reason, the Committee shall proceed with the inquiry on the basis of prima facie evidence.
- j. The Committee shall record the entire process of hearing, and shall consider the minutes duly signed by the parties to the inquiry, as token of their acceptance to the record.
- k. If the Committee so desires, it shall summon (by way of notice) any Employee, or other persons to appear before the Committee as a witness.
- l. The Committee after careful examination, shall recommend to the Employer, the disciplinary action which the Committee thinks is fit for the Respondent.
- m. The Committee is expected to complete the inquiry within a period of 90 (ninety) days from the date of receipt of the complaint, and shall submit the inquiry report with its recommendations to the Employer within 10 (ten) days of the closure of the inquiry and shall also make such report available to the parties. The Employer is bound to act on such report within 60 (sixty) days of receipt.
- n. During the inquiry procedure, none of the parties shall have a right to be represented by any legal practitioner.

- o. The Aggrieved Person / Respondent has the right to appeal against the recommendations of the Internal Committee, within a period of 90 (ninety) days.

5.3. **Interim relief**

During the pendency of the inquiry, on a written request being made by the Aggrieved Person, the Internal Committee may recommend that PPF: (a) transfers the Aggrieved Person to another office as deemed appropriate, or (b) transfers the Respondent to another office as deemed appropriate, or (c) grant leave to the Aggrieved Person up to a period of 3 (three) months, which shall be in addition to the leave the Aggrieved Person would be entitled to, or (d) restrain the Respondent from reporting on the work performance of the Aggrieved Person. The Internal Committee may also recommend to PPF to suspend the Respondent during the pendency of the inquiry if the circumstances so merit.

5.4. **Internal Committee's Recommendations**

5.4.1. In the event the Respondent is found to be guilty of Sexual Harassment, depending upon the gravity of the offence and without prejudice to any legal right(s) that the Aggrieved Person may have, the Internal Committee may make any of the following recommendations of disciplinary action against the Respondent:

- a. Direct the Respondent to undergo training or counselling to address any specific issues;
- b. Direct the Respondent to provide a written apology to the Aggrieved Person clearly indicating that such behaviour will not be repeated and that no retaliatory steps will be taken by him/her or others on his/her behalf against the Aggrieved Person.
- c. Transfer the Respondent to another position or to a different place;
- d. Give a verbal or written warning which will also be noted in the Respondent's personnel record;
- e. Withhold increment or bonus (whether in full or part);
- f. Withhold promotion;
- g. Direct that the Respondent be terminated / suspended from employment; or
- h. Any other recommendations as it may deem fit.

5.4.2. The Internal Committee may also recommend to PPF to deduct a sum from the salary of the Respondent and pay it to the Aggrieved Person as compensation, or direct the Respondent to pay a compensatory amount to the Aggrieved Person. With respect to determining the amount of compensation, the Internal Committee shall have regard to: (a) the mental trauma, pain suffering and distress caused to the Aggrieved Person, (b) the loss of career opportunity, (c) medical expenses incurred for medical treatment, and (d) income and financial status of the Respondent.

5.4.3. In the event the Internal Committee comes to the conclusion that the Respondent is not guilty, then the compliant shall be dropped by the Committee and the Employer shall be notified that no further action need be taken.

5.4.4. If the Aggrieved Person desires to take criminal action against the Respondent, the Internal Committee and PPF shall support the same, and also provide all reasonable assistance in this regard.

6. **PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE**

Where the Internal Committee arrives at the conclusion (after undertaking an inquiry) that the allegation against the Respondent is malicious or that the Complainant has made the complaint knowing it to be false or that the Complainant has produced any forged or misleading document, it may be recommended that PPF takes action against the

Complainant. The Internal Committee may also recommend that PPF takes appropriate disciplinary action, if it arrives at a conclusion that any witness has given false evidence or produced any forged or misleading document. These recommendations of the Internal Committee will be similar to the recommendations of disciplinary action that the Committee would make against the Respondent, should the allegation of Sexual Harassment be proved. However, mere inability to substantiate a complaint or provide adequate proof will not result any action as detailed in this clause.

7. CONFIDENTIALITY

- 7.1. PPF understands that it is difficult for the Complainant to come forward with a complaint of Sexual Harassment and recognizes the Complainant's interest in keeping the matter confidential.
- 7.2. To protect the interests of the Complainant, the Internal Committee, PPF personnel, the Complainant, Respondent, persons assisting with the inquiry process and witnesses are all bound to keep information relating to the inquiry process confidential, and shall not disclose the same to others within the organisation or to the general public / media.
- 7.3. The Complainant, Respondent, witnesses, persons assisting with the inquiry process and Investigating Members would be liable for penalty as may be determined by PPF, and/or disciplinary action up to and including termination, in case any of them breach the confidentiality of the inquiry process.

8. PROTECTION AGAINST RETALIATION

- 8.1. PPF prohibits any form of retaliation against anyone who has raised a complaint of Sexual Harassment or has cooperated in any inquiry involving a complaint of Sexual Harassment.
- 8.2. Any individual who believes that he/she is experiencing retaliation, by way of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report this to the Internal Committee, and PPF will then address the concerns raised. Any person who is found to be guilty of retaliation may be subject to appropriate disciplinary action. Anyone who abuses this procedure (for example, by maliciously making an allegation knowing it to be untrue) would also be subject to disciplinary action.

9. ACCESS TO REPORTS AND DOCUMENTS

All records relating to Sexual Harassment complaints, including contents of meetings of the Internal Committee, results of investigations and other relevant material will be kept confidential by PPF, except where disclosure is required under disciplinary or other remedial processes and/or under applicable law.

10. DUTIES AND RESPONSIBILITIES OF THE EMPLOYER

PPF, as part of its obligations under the Act, shall be required to undertake the following actions:

- a. Notifying, publishing and circulating notices stating that any and all acts of Sexual Harassment at the Workplace are expressly prohibited;
- b. Providing appropriate and safe working conditions to the Employees in respect of work, leisure, health and hygiene, including safety from all persons who enter the Workplace. If there is any indication that there may be a threat of physical danger to any person, the Employer should seek professional advice in this regard;

- c. HELPING to ensure that the Workplace environment is not hostile towards any Employee or that no Employee has reasonable ground to believe that she/he has been disadvantaged in that context;
- d. Displaying at a conspicuous place in the Workplace, the penal consequences for any act constituting Sexual Harassment and the order constituting the Committee;
- e. Ensuring that Employees are aware of appropriate and acceptable standards of behavior;
- f. Making known this policy to all the Employees, including the procedure for making and addressing complaints;
- g. Taking early corrective action to deal with behavior that may constitute Sexual Harassment;
- h. Organizing workshops and awareness programs at regular intervals for sensitizing Employees;
- i. Organizing seminars, orientation, capacity and skill building programs for the Investigating Members;
- j. If applicable, providing necessary facilities to the Committee for dealing with complaints and conducting the inquiry, and generally ensuring that all allegations of Sexual Harassment are handled in a sensitive manner, with respect to the dignity of the persons involved;
- k. Assisting in securing the attendance of the Respondent and the witnesses before the Committee;
- l. Making available such information to the Committee as it may require with respect to the complaint;
- m. Providing assistance to the Aggrieved Person if she/he chooses to file a complaint in relation to the offence, under the Indian Penal Code (“IPC”) or any other law for the time being in force;
- n. Monitoring timely submission of reports by the Committee; and
- o. Initiating disciplinary action against any Employee for breaching any provision(s) of this policy, which shall include but not be limited to, termination of employment.

APPENDIX A

CONTACT DETAILS OF INVESTIGATING MEMBERS

S.NO	NAME	ADDRESS	TELEPHONE NUMBER
	Heena Chheda	The Ruby, 8th Floor, 29, Senapati Bapat Marg (Tulsi Pipe Road), Dadar (West), Mumbai- 400028	22 6602 2222
	Pushplata Tripathi	The Ruby, 8th Floor, 29, Senapati Bapat Marg (Tulsi Pipe Road), Dadar (West), Mumbai- 400028	22 6602 2222
	Chetna Phirke	The Ruby, 8th Floor, 29, Senapati Bapat Marg (Tulsi Pipe Road), Dadar (West), Mumbai- 400028	22 6602 2222
	Priyanka Joshi	The Ruby, 8th Floor, 29, Senapati Bapat Marg (Tulsi Pipe Road), Dadar (West), Mumbai- 400028	22 6602 2222
	Dolly James	Garden View CHS, H9-2/1, Sector 8, Near Mahatma Colony, New Panvel - West, Pin Code- 410206	9819475029