

**PRAKASH WOOLLEN & SYNTHETIC MILLS  
LIMITED**

**Policy on Prevention of sexual harassment at work place**

Date Of Approval	08.02.2022
APPROVED BY THE BOARD OF DIRECTORS	
Daya Kishan Gupta (Managing Director)	

## **1. PREAMBLE**

Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited & Synthetic Mills Limited is committed towards providing for its employees, a safe and productive work environment that promotes the confidence to work, to innovate and to perform without fear of any type of harassment. Sexual harassment at workplace violates a person's sense of dignity, and is against fundamental and basic human rights. It is therefore our duty, as a responsible organization, to prevent and deter any activities that lead to such harassment by taking all steps required.

## **2. POLICY**

We, at Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited & Synthetic Mills Limited believe that every employee has the right to work in an environment that is free from Sexual harassment, intimidating or offensive behaviour and wherein such issues are resolved without fear of reprisal.

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder. Accordingly, the policy covers all key aspects of the Act.

At Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited & Synthetic Mills Limited, we have zero-tolerance for Sexual Harassment. We value the rights of every single employee working at Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited & Synthetic Mills Limited and wish to protect their dignity. In doing so, we are determined to promote a safe environment in which persons of both sexes work and complement each other as equals leading to maximum productivity. Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited has therefore adopted a gender-neutral policy.

## **3. SCOPE AND EFFECTIVE DATE**

This policy applies to all categories of employees of Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited & Synthetic Mills Limited in India including permanent management and workmen, temporary staff, trainees and employees on contract at its workplace or at client sites. Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other Business Partners as defined under the Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited code of conduct and will seek appropriate actions and remedy as provided under the Act and rules framed thereunder. This policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

## **4. SEXUAL HARASSMENT**

Sexual harassment may occur not only where a person uses his authority to solicit sexual favour to control, influence or affect the career, salary or job of another person, but also

between peers. It may also occur between a Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited employee and someone that employee deals with, in the course of his/her work who is not employed by the Company.

As per law, Sexual Harassment has been defined to include any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- physical contact or advances
- a demand or request for sexual favours
- making sexually coloured remarks
- showing pornography
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature"
- Where the victim has reasonable grounds to believe an objection to such unwelcome behaviour would disadvantage her prospects in aspects such as recruitment/employment or allotment of work, promotion or evaluation of the engagement in any company activity including off-duty
- Where any such act(s) create an intimidating / hostile / offensive work environment and/or affect the persons work performance.
- Sexual Harassment shall now also include any of the above done through digital means while working from home i.e. through messages, phone calls, over video calls etc.

## 5. WORKPLACE

- Premises, locations, establishments, enterprises, offices, branches or units established, owned, controlled by Prakash Woollen
- All Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited related activities performed at any other site/work from home away from Prakash Woollen's premises
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Places visited by the Employee arising out of or during the course of employment including transportation provided by the Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited for undertaking such journey.
- Any misbehaviour in the nature of Sexual Harassment on any social media shall also be considered Sexual Harassment at workplace irrespective of whether such sexual behaviour was shown during or outside of office hours.

## 6. RESPONSIBILITY

All managers must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

All employees are expected to take personal responsibility for upholding Company's standards by treating with dignity and respecting all business partners, all job applicants, fellow employees, customers, contract and temporary personnel, including apprentices, trainees and any other individuals associated with Company. All are encouraged to advise

others of behaviour that is unwelcome. Often, some behaviours are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behaviour

Complaint can be made either to the employee's immediate manager or supervisor, or the designated Human Resources Representative or any member of the Internal Complaints Committee as per the comfort of the aggrieved employee. Such complaints received by persons other than members of the Internal Complaints Committee shall be referred to the Committee and under no circumstances shall be independently investigated.

## **7. COMPLAINT MECHANISM**

In conformity with the directive of Supreme Court of India, and in compliance with the Act, an appropriate complaint mechanism in the form of "Internal Complaints Committee" has been constituted in the Company against sexual harassment at work- place for time-bound redressal of the complaint made by the victims.

## **8. INTERNAL COMPLAINTS COMMITTEE**

As Prakash Woollen & Synthetic Mills Limited & Synthetic Mills Limited operates PAN India with multiple locations, the organization has constituted the Internal Complaints Committee. Current nominated members of the committees are given in Annexure A.

Any complaint or concern may be first taken up with the local representative who would then escalate the matter to the concerned ICC for initiating necessary action. Alternatively, the complaint may be lodged with any of the aforesaid ICC members who would then request the concerned regional ICC to look into the complaint. Tenure of the Committee: This committee will be in tenure for 3 years.

The Internal Complaints Committee is responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

## **9. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT**

### **a. Informal Resolution Options**

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

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

**b. Formal Resolution - Complaints**

- i. 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 in writing to the Central Complaints Committee or the Regional

Complaints Committee constituted by the Management ii. The complainant shall submit 6 (six) copies of the Complaint to the Complaint Committee along with supporting documents and the names and addresses of the witnesses in writing and can be in form of a letter, preferably within 90 days from the date of occurrence of the alleged incident and in case of series of incidents, within a period of 90 days from the date of the last incident in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose name, department, division and location, to enable the committee to contact and take the matter forward.

- iii. If the victim is unable to lodge the complaint on account of incapacity, the following may do so on the victim's behalf, with the victim's written consent:

- Legal Heir, relative or friend
- Co-worker
- Any person having the knowledge of the incident

iv. Delay in Filing the Complaint

A complaint relating to sexual harassment shall ordinarily be referred within 90 days from the date of the alleged offence and the delay if any, in referring such complaint may be condoned by the Complaints Committee provided that the complainant submits sufficient cause for such delay and the Complaints Committee is satisfied with the reasons for the delay. Any perceived delay in filing a complaint under this Policy, by itself, shall not be a relevant factor in deciding the veracity of the complaint or in appreciating evidence presented.

- v. The Complaint Committee shall send 1(one) of the copies received from the Complainant to the accused (respondent) within a period of 7 working days. vi. The Accused (respondent) shall file the reply to the Complaint along with supporting documents and the names and addresses of the witnesses, within a period not exceeding 10 working days from the date of receipt of the documents.

- vii. The Complaint committee has the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved (complainant) or Accused (respondent) fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Chairperson, as the case may be, 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.

- viii. In conducting the enquiry, a minimum of 3 members of the complaints committee including the external member shall be present
- ix. The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee
- x. The Complaints Committee shall conduct such investigations & inquiry within a period of 90 days from the date of receipt of the Complaint. Complaints Committee shall then submit a written report containing the findings and recommendations to the CHRO not later than 10 days from the date of completion of the enquiry. The CHRO shall act upon the recommendation within 60 days of its receipt
- xi. The Complaint's Committee report shall also be made available to the concerned parties

xii. Punishments

Where the Complaints Committee arrives at the conclusion that the allegation against the respondents been proved, it shall recommend to the CHRO to take action which may include the following:

- Written apology;
- Warning;
- Reprimand or Censure;
- Withholding of Promotion;
- Withholding of pay rise or increments; or
- Terminating the respondent from service; or
- Undergoing a counselling session or carrying out community service.

xiii. Appeals

The provisions relating to appeals, revision and review as per the existing Acts, rules or regulations governing misconduct or offence as applicable to a workplace. Appeals may be preferred by any person aggrieved from the recommendations of the Complaint Committee to the Court or Tribunal in accordance with the rules framed under this Act

xiv. Punishment for False or Malicious Complaint and False Evidence

Where the Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved victim or any other person making the complaint has made the complaint knowing it to be false or the aggrieved victim or any other person making the complaint has produced any forged or misleading document, it may recommend to the CHRO to take action in accordance with the provisions of the service rules applicable to her or him.

**10. LEAVE OF ABSENCE FOR ATTENDING ENQUIRY**

Complaints Committee at its discretion has the authority to grant leave to the victim up to a maximum of 3 months, over and above the regular leave as per service rules, for attending enquiries

## **11. 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.

Confidentiality will be maintained throughout the investigatory process to protect the interests of the victim, the accused person and witnesses/others who may report incidents of sexual harassment.

## **12. ACCESS TO REPORTS AND DOCUMENTS TO THE VICTIM**

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.

## **13. PROTECTION TO THE COMPLAINANT / VICTIM**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subjected 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.

## **14. EMPLOYEE EDUCATION / COMMUNICATION**

The most important step in this direction is the communication cascade .The interactive training presentation can be accessed by all employees. Employees who would like to further clarify their understanding of the Policy are encouraged to call the respective Committees whose contact details are provided in Annexure A or get in touch with their respective local HR representatives.

In case of any inconsistency between this policy and the Act or rules framed there under, the provisions of the Act or rules framed there under as may be amended from time to time, shall prevail.

IN CONCLUSION, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and wherein every employee is treated with dignity and respect.

## **ANNEXURE - A**

### **Details of the Internal Complaints Committee**

<b>NAME OF THE MEMBERS</b>	<b>POSITION OF THE MEMBERS</b>	<b>E-MAIL I'D</b>
Rajni Gupta	Presiding Officer	<a href="mailto:rajniguptapwm@gmail.com">rajniguptapwm@gmail.com</a>
Ashish Gupta	Member	<a href="mailto:ashishgupta@prakashwoollen.com">ashishgupta@prakashwoollen.com</a>
Kapil Gupta	Member	<a href="mailto:kapil@prakashwoollen.com">kapil@prakashwoollen.com</a>
Asha Goel	External Member	<a href="mailto:gasha9816@gmail.com">gasha9816@gmail.com</a>