

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORK PLACE

APPROVED BY THE BOARD OF DIRECTORS ON NOVEMBER 09, 2015

I. COMMITMENT:

Pennar Engineered Building Systems Limited (PEBS Pennar or the Company) is committed in providing the work environment that ensures every employee is treated with dignity, respect, and afforded equitable treatment.

II. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises and any social, business or other functions where the conduct or comments may have an impact on the workplace or workplace relations of the Company.

III. SEXUAL HARASSMENT:

Sexual Harassment at the workplace includes:

1. sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. Expressed or implied any threat or promise of preferential or differential treatment in her employment
6. any conduct that has the effect of interfering with an individual's work performance or creating an offensive work environment.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company are personally responsible to ensure that their behaviour is in accordance with this policy and should ensure in maintaining a work environment free from sexual harassment.

V. COMPLAINTS COMMITTEE (COMMITTEE):

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint and for ensuring time bound treatment of such complaints.

The Complaints Committee will comprise of the following members:

1. N Uma Rani, DGM HR & Admin – Presiding Officer
2. Renuka Sheshadri – (Women Member familiar with Women Issues)
3. K Vani – Manager HR - Member
4. V Rajeshwari Sr Manager - Member

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

The Committee is responsible for:

1. Investigating every formal written complaint
2. Taking appropriate remedial measures
3. Discouraging and preventing employment-related sexual harassment

VI. PROCEDURE FOR SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

A. Informal Resolution:

When an incident of sexual harassment occurs, the victim can communicate her objections immediately to the harasser and request the harasser to behave civilly. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring her concern to the notice of Complaints Committee for redressal of grievances. The Complaints Committee will investigate the Complaint.

B. Formal Resolution:

1. An 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 Presiding Officer of the Complaints Committee. The complaint shall be in writing and can be in form of a letter, within 15 days from the date of occurrence of the alleged incident. Alternately, the employee can send the complaint through an email.
2. The Presiding Officer of the Complaints Committee will verify and proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.
In the event, the allegation does not fall under the purview of Sexual Harassment; the Presiding Officer will record his finding with reasons and communicate the same to the complainant.
3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, will proceed to investigate the allegation.
4. Where such conduct on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Presiding Officer will conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Complaints Committee as soon as practically possible and in any case, not later than 60 days from the date of receipt of the complaint. The Complaints Committee will examine the findings and recommendations of the presiding officer and will approve corrective action to be taken within 60 days. Presiding Officer shall inform the complainant of the action taken on the complaint.
Corrective action may include any of the following:
 - a. Apology
 - b. Counselling

- c. Written warning
 - d. Change of work assignment / transfer
 - e. Termination of services of the employee found guilty of the offence
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action.

(Illustrative representation of the process flow given in Annexure 1)

VII. CONFIDENTIALITY:

The Committee will keep the details of the Complainant confidential and also ensure that the investigation process is kept confidential.

VIII. SAFEGUARD TO COMPLAINANT/ VICTIM:

The Company will ensure 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 the 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 subjected to disciplinary action.

IX. ROLE OF THE COMPANY

- To provide safe working environment at work place and safety from the persons coming into Contract at workplace.
- To Display at conspicuous place the penal consequence for sexual harassment and order of committee.
- Organise Workshop, awareness programs at regular intervals.
- To facilitate the complaint committee for dealing with complaint and inquiry.
- Provide assistance to women if she chooses to file a complaint for offence under IPC.
- Treat Sexual harassment as misconduct under service rules and initiate action
- Monitor timely submission of report by the Complaint committee.

X. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing a workplace free from sexual harassment/ discrimination so as to ensure that every employee is treated with dignity and due respect.

For and on behalf of the Board of Directors



P V Rao

P V Rao
Managing Director
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Place: Hyderabad
Date: November 09, 2015



Annexure-1

