



***POLICY ON SEXUAL HARASSMENT AT WORKPLACE***

## 1. PREAMBLE

Our Company considers Male and Female Employees as Equal and committed to protect and respect all Employees of our Company and thus this Policy is framed to protect the Employees of our Company from sexual abuse and use their fundamental right of Equality and to provide the Safe Environment and Safe workplace.

This Policy is framed to provide protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

## 2. APPLICABILITY

This Policy is applicable for all Employees of our Company whatever may be the designation i.e. it includes Top to Bottom level of Employees. Any Employees of our company can take the shelter of this policy.

## 3. SCOPE

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

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

Sexual harassment would mean and include any of the following:

- a) Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- b) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- c) Even teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- d) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- e) Any unwelcome gesture by an employee having sexual overtones



#### 4. COMPLAINT MECHANISM

An appropriate complaint mechanism in the form of “Internal Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

Every Employee should use their right of freedom and equality and on occurrence of any such event, requested to come forward and complain and take shelter under this policy.

#### 5. INTERNAL COMPLAINTS COMMITTEE

The Company has framed Committee in this regard known as INTERNAL COMPLAINTS COMMITTEE. The Committee Members are as follows:

| Sr. No. | Name of Person       | Profile                 | Designation in Committee       | Contact by writing letter at  |
|---------|----------------------|-------------------------|--------------------------------|---|
| 1       | Mrs. Riya R. Mehta   | Director of the Company | Chairperson /Presiding Officer | To,<br><b>Sexual Harassment Complaint Redressal Committee</b><br>Plot No. 2234, Near Kranti Gate, GIDC Metoda - 360 021, Talu-Lodhika, Dist-Rajkot, Gujarat, INDIA. |
| 2       | Ms. Sangita Japadiya | Member of an NGO        | Member                         |   |
| 3       | Mr. Guarav Bhat      | HR Head                 | Member                         |   |
| 4       | Mr. Kishor Kikani    | CS of the Company       | Member                         |   |

Any Change in the Committee shall be with the approval of Management. Every Committee member shall hold office for a period not exceeding 3 (three) years.

#### 6. COMPLAINT REDRESSAL MECHANISM

- 1) When an Incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the Committee for redressal of their grievances within 3 months of occurrence of such event. Moreover, Victim can directly contact on the Mobile number given above and the Complaints Redressal Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.
- 2) The Committee after receipt of such Complaint immediately will take action and lodge complaint in the Register maintained for the same.
- 3) The Committee shall call upon victim and heard the matter and record allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for



lady employees involved Policy on sexual harassment of employee involved and a male officer for male employees, involved shall meet and record the statement.

- 4) 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 “Enquiry” shall be conducted and concluded.
- 5) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 6) The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her, an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 7) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 8) 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.
- 9) 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.
- 10) The Committee shall call upon all witnesses mentioned by both the parties.
- 11) 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.
- 12) The Committee shall complete the Enquiry within reasonable period but not beyond 3 months and shall communicate their report to HR Head and HR Head has a power to take corrective action as follows:
  - a. Formal apology
  - b. Counseling
  - c. Written warning to the perpetrator and a copy of it maintained in the employee’s file
  - d. Change of work assignment / transfer for either the perpetrator or the victim
  - e. Suspension or termination of services of the employee found guilty of the offence

## 7. OTHER CLAUSES



+91 2827 287930/31  
+91 7998 7998 16



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- **IF EVENT NOT FALL UNDER THE PURVIEW OF SEXUAL HARASSMENT**

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.

- **IN CASE OF FALSE COMPLAINT**

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

- **ACCESS TO REPORTS AND DOCUMENTS**

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.

- **PROTECTION TO COMPLAINANT / VICTIM**

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 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 subject to disciplinary action.

In Case the Committee find the degree of offence recoverable under the Indian Penal Code, then this fact shall be mentioned in the report and appropriate action shall be initiated by the Management for Police Complaint.

## **8. RECORD OF REPORTS**

The Committee shall keep the record of Reports of all the Complaints and at the end of year shall submit the report to HR Head and update about the pending Complaints.

## **9. 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. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

## **10. DISCLOSURE OF THIS POLICY**



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This Policy shall be hosted at website of the Company and also will be displayed on the notice Board of the Company.

## 11. REVIEW AND UPDATION OF POLICY

The Committee shall review the policy and if founds that any matter of this policy needs to change, shall inform the HR Head and any employee can also represent their views before the Committee at any stage for an amendment in the policy and then committee shall look and finalize whether amendment to be made or not and represent before the HR Head and after amendment, Policy shall be updated where it has been displayed with effective date of amendment.



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