

POLICY ON SEXUAL HARASSMENT OF WOMEN EMPLOYEES IN ACL.

1.0 OBJECTIVE

To provide protection against sexual harassment of women employees and for the prevention & redressal of complaints of sexual harassment and for the matters connected therewith and incidental thereto.

2.0 POLICY

- 2.1 ACL is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

3.0 SCOPE AND EFFECTIVE DATE

- 3.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

- 3.2 Sexual harassment would mean and include any of the following: -

- (a) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;

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, sound, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her performance;

- (b) Eve-teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

- (c) 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;
- (d) Conduct of such an act at work place or outside in relation to an employee of ACL, or vice versa during the course of employment; and
- (e) Any unwelcome gesture by an employee having sexual overtones.

These are indicative acts and not exhaustive in nature, as such any other incident amounts to sexual harassment may also be included in such acts of misconduct.

4.0 INTERNAL COMPLAINT COMMITTEE

- 4.1 The Chairperson of all ICC will be Ms. Pearl Tiwari, Jt. President (CSR), Andheri.
- 4.2 A Committee is to be constituted at Corp. Office, Units & Regional Offices where females are employed by the local Management to consider and redress complaints of sexual harassment. The constitution of the Committee at Corp. Office, Plant location / Regional Office will be as under, in which half of the Committee Members would be women: -

S.No.	Committee	Member	Name of the Person	Remarks
1	Presiding Officer	One	Ms. Doris Rao	(Woman employed at a senior level to be nominated as Presiding Officer by Corp. Office / Plant location / Regional Office)
2	Member	One	Mr. Nikita Dhurandhar	(To be nominated from Regional HR / Plant HR)
3	Members	Two	Ms. Jessie Lobo / Mr. KK Vishwnathan	(To be nominated from female / male employee)
4	Member	One	Ms. Anagha Mahajani	(To get nomination of female ACF employee)

(Note : The Regional HR / Plant HR at the respective location in consultation with Business Head / Unit Head will nominate members as above).

- 4.2 The Committee shall hold Office for a period of three years from the date of its formation.
- 4.3 A quorum of 2 members is required to be present for the proceedings to take place. The quorum shall include Presiding Officer and at least one member.

4.0 REDRESSAL PROCESS

- 5.1 Any employee who feels and is being sexually harassed directly or indirectly may submit in writing a complaint of the alleged incident to the Presiding Officer of the Committee within 7 days of occurrence of incident. If required, Member of ICC shall render all reasonable assistance of the woman for making the complaint in writing.
- 5.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 5.3 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 5.4 At the first meeting, the Committee member shall hear the Complainant and record her 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 employee shall assist her to record the statement.
- 5.5 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.
- 5.6 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.
- 5.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

6.0 ENQUIRY PROCESS

- 6.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 6.2 The Committee shall prepare and handover the Statement of Allegation to the person against whom complaint is made and give him an opportunity to submit a written explanation if he so desires within 7 days of receipt of the same.
- 6.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 6.4 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.
- 6.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she 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 shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.
- 6.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 6.7 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.
- 6.8 The Committee shall complete the 'Enquiry' within reasonable period but not beyond two months and communicate its findings to the Chairperson. The Chairperson will review and scrutinize the reports & send her recommendations for action to the Joint President (HR). The report of the Committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment.

7.0 OTHER POINTS TO BE CONSIDERED

- 7.1 The Committee may recommend to the Joint President (HR) action which may include minor or major punishment or any of the other appropriate disciplinary action.

- 7.2 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
- 7.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, ACL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 7.4 In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for lodging a Police Complaint.

This Policy shall be governed by “The protection of Women against sexual harassment at Workplace Bill 2010” and legislation enacted later on.

The Management reserves the right to amend, alter, modify any or all the provisions of this Policy.



Meenakshi Narain
Joint President (HR)
Corporate HR
Andheri