



National Plywood Industries Limited

Codes & Policies

POLICY FOR PREVENTION OF SEXUAL HARASSMENT IN THE WORKPLACE

Preface

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has framed a Policy on Prevention of Sexual Harassment in the Workplace. The existing Policy has been amended by incorporating the rules and procedures as mandated vide notification dated 9th December, 2013, sent by the Ministry of Women and Child Development. The revised Policy shall be in effect from 13th November, 2017. National Plywood Industries Limited (NPIL) is committed to creating an ambience and work ethos in which all employees can work together free from sexual harassment.

The Company believes that all the employees, including other persons who have dealings with the Company have the right to be treated with dignity. Sexual harassment is an offence and is, therefore, punishable.

This Policy will be called the Policy on Prevention of Sexual Harassment in the Workplace and extends to all Employees of the Company. This Policy is deemed to be incorporated in the service conditions of all employees.

1. Definitions

- **“Act”** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- **“Company”** means National Plywood Industries Limited
- **“Employee”** means any person on the rolls of the Company to whom this Policy is applicable – including temporary, part time, honorary, employee by whatever name called and employees engaged on a casual or project basis as trainees and also engaged through a contractor
- **“Policy”** means the Policy for Prevention of Sexual Harassment in the Workplace
- **“Sexual Harassment”** includes any unwelcome, sexually determined behaviour, direct or by implication, and includes any physical contact and advances, a demand or request for sexual favours, sexually coloured remarks, unsavoury remarks, showing pornography, any other unwelcome physical (for example, touching or brushing against any part of the body and the like, etc.), verbal or non-verbal conduct having sexual overtones

For the purposes of this Policy "Sexual Harassment" shall include, but will not be confined to the following:

- i. Unwelcome sexual advances, requests for sexual favours, and/or verbal or physical conduct of a sexual nature made, either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any Company activity
- ii. Unwelcome sexual advances and/or verbal, non-verbal, or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or through e- mail, gestures, showing of pornography, lurid stares, physical contact or



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- molestation, stalking, sounds or display of a derogatory nature that may have an effect or purpose of interfering with an individual's performance or of creating an intimidating, hostile or offensive environment
- iii. forcible physical touch or molestation
- iv. Eve teasing, innuendos and taunts, physical confinement against one's will and any other act likely to impinge upon one's privacy
- v. Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace hostile or intimidating to a person belonging to the other/same sex
- vi. Any such conduct as stated in (i) to (v) above committed by a third party or an outsider in relation to an Employee of NPIL, or vice versa during the course of employment

2. Scope

This Policy will be applicable to all allegations of Sexual Harassment made by an Employee/third party or against an Employee/third party, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company's premises.

3. Complaints Committee

The Company has instituted an "Internal Complaints Committee" for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The "Internal Complaints Committee" shall consist of a Presiding Officer and 3 or more members as per requirement, provided that at least half of the members are women. All members of the Committee will hold office for a period of three years. The following will be the members of the Committee:

- Presiding Officer: Shall be a woman employed at a senior level at workplace from amongst the employees.
 - i. In case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Company
 - ii. In case the other offices or administrative units of the workplace do not have senior level woman employee, the Presiding Officer shall be nominated from any other workplace or department or administrative office of the Company
- Members:
 - i. Two or more members shall be women who are currently employed at the Company
 - ii. One member must be from a Non-Governmental Organisation (NGO) or associations committed to prevention of sexual harassment or a person familiar with issues related to sexual harassment

4. Grievance Procedure

- Any Employee ("Complainant") may lodge a complaint of Sexual Harassment ("Complaint") against an Employee/third party ("Respondent") or vice versa, with the any of the members of the Committee within three months from the date of



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occurrence of the alleged incident. If the Complainant feels that she/he cannot disclose her/his identity for any particular reason with the Committee members, she/he can address the complaint to the Chairman.

- Such a Complaint should be in writing in 6 copies.
- The Committee, before initiating the inquiry at the request of the aggrieved woman, will take steps to settle the matter between her and the respondent through mutual settlement or conciliation. Once such settlement has been arrived at no further enquiry shall be conducted by the Internal Complaint Committee, however, a Complainant can further refer the same to Internal Complaint Committee for redressal if the terms of the settlement have not been complied. Provided that no monetary settlement shall be made as a basis of conciliation
- The Complaints Committee will hold a meeting with the Complainant latest within seven (7) working days from the date of receipt of the complaint and advance intimation for such meeting shall be given to the Complainant
- The Committee, while investigating the complaint referred to it, will call upon both the parties separately, listen, look at proof (if any), verify documents produced by the parties, allow the parties to produce witnesses and to put forth their say. Both the parties during the course of inquiry are given an equal opportunity of being heard
- At the first meeting of the Complaints Committee, the Complainant shall be heard and her/his statement recorded (Statement of Allegation). The Complainant can produce corroborative material with a documentary oral material, etc., to substantiate his/her complaint
- Thereafter, the Respondent will be called to a meeting by the Complaints Committee and will be informed of the Complaint and an opportunity will be given to the Respondent to give an explanation. Thereafter, an "Enquiry" shall be conducted
- In the event the complaint does not fall under the purview of Sexual Harassment/the Complaint on the face of it does not disclose an offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof
- In case the complaint registered by the complainant is found to be false at any stage, the complainant shall be liable for appropriate action as per the service rules of the Company

5. Procedure for Enquiry

- The Complaint's Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Respondent. The Complaints Committee shall record all the proceedings of the Enquiry and all parties present at any of the communication meetings, shall endorse the same in token of authenticity thereof. The Complainant shall submit six (6) copies of the complaint along with supporting documents and the names and addresses of the witnesses
- On receipt of complaint, the committee shall send one of the copies to the respondent within a period of seven (7) working days
- The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten (10)



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working days from the date of receipt of copy. The Complainant will be provided with a copy of the written explanation submitted by the Respondent

- If the Complainant or the Respondent desire any witness/es to be called, they shall communicate in writing to the Complaints Committee the names of witness/es that they propose to be called
- If the Complainant desires to tender any documents by way of evidence before the Complaints Committee, she/he shall supply true copies of such documents to the Complaints Committee. Similarly, if the Respondent desires to tender any documents in evidence before the Complaints Committee he/she shall supply true copies of such documents to the Complaints Committee and will affix his/her signature on the same to certify it to be a true copy
- The Committee will call upon all witnesses mentioned by both the parties
- The Complaint's Committee will provide every reasonable opportunity to the Complainant and to the Respondent, for putting forward and defending their respective case
- The Complaints Committee shall make an enquiry in accordance with the principles of natural justice
- The Complaints Committee shall complete the "Enquiry" within a period of ninety (90) days and communicate its findings and its recommendations for the following disciplinary action to the HR Department within a period of ten (10) days from the date of completion of enquiry:
 - i. Written apology
 - ii. Warning
 - iii. Reprimand or Censure
 - iv. Withholding of Promotion
 - v. Withholding of pay raise or increment, or
 - vi. Termination from service, or
 - vii. Counselling/community service
- The Chairman of the committee will direct HR Department to take action in accordance with the recommendations proposed by the Complaints Committee
- The HR Department shall act upon the recommendations of the Complaints Committee within sixty (60) days of receipt by the concerned
- In case the Company finds that the degree of offence coverable under Section 509 and other relevant provisions of the Indian Penal Code, then the Committee will forward the same to police within a period of seven (7) days
- The Complaints Committee shall be governed by such rules as may be framed by Company from time to time, taking into account The Sexual Harassment of Women at
- Workplace (Prevention, Prohibition and Redressal) Act, 2013 and related rules and the best practices from India and abroad

6. Protection against Victimization

The victim of Sexual Harassment has the option to seek transfer of the perpetrator or his/her own transfer. The Company is committed to ensuring that no employee who brings forward



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harassment concern is subject 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.

7. Obligation of the Management

The Management of the Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.

8. Annual Report

The Complaints Committee shall prepare an annual report in each calendar year, giving a full account of its activities during the previous year and submit the same to the HR Department. The HR Department shall include its report the number of cases filed, if any, and their disposal under the Act in the Annual report of the Company.

9. Amendment

The Company reserves its right to amend or modify this Policy by Managing Director in consultation with the Chairman of the Complaints Committee and the HR Department in whole or in part, at any time without assigning any reason whatsoever.

10. Conclusion

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

Annexure-1

Members of the Internal Complaint Committee:

Presiding Officer:

Stuti Periwal

Members:

Malvika Periwal

Shruti Bothra

Ashwini Kumar Jena