

Sree Sumangala Metals and Industries Private Ltd.

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SREE SUMANGALA METALS AND INDUSTRIES PRIVATE LTD
Policy against Sexual Harassment

Ref No: SSMI/HR/POL/SH

POLICY AGAINST SEXUAL HARASSMENT

1. OBJECTIVE:

Sexual harassment results in violation of the fundamental rights of a woman to equality under articles 14 and 15 of the Constitution of India, her right to life and to live with dignity under article 21 of the Constitution and her right to practice any profession or to carry on any occupation, trade or business, which includes a right to a safe environment free from sexual harassment. SSMI believes that sexual harassment also undermines the integrity of the employment relationship. All employees have the right to work in an environment that is free from any form of sexual harassment. Anyone engaging in such conduct will be subject to discipline that may range from a warning to dismissal. The objective of this policy is to create a gender sensitive and congenial working atmosphere in the organization.

SSMI has an ongoing and active awareness program to create awareness among its employees in respect of the provisions of and obligations under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. This awareness program is in addition to the introduction to the policy provided at the induction of new employees. The employees are expected to keep themselves updated on this awareness program, which is being made available to the employees on a continuing basis for their benefit.

2. APPLICABILITY:

- a. This policy is applicable to all permanent/temporary employees in the organization.
- b. All terms used hereunder are as per The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

3. WHAT IS SEXUAL HARASSMENT?

"Sexual harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- a. physical contact and/or advances; or
- b. involving unwelcome and explicit sexual overtures; or
- c. a demand or request for sexual favors; or
- d. making sexually colored remarks; or
- e. showing pornography against the will of a women; or
- f. any other unwelcome physical or verbal conduct of sexual nature



The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- a. implied or explicit promise of preferential treatment in her employment;or
- b. implied or explicit threat of detrimental treatment in her employment;or
- c. implied or explicit threat about her present or future employment status;or
- d. interference with her work or creating an intimidating or offensive or hostile work environment for her;or
- e. humiliating treatment likely to affect her health or safety

4. WHAT IS NOT SEXUAL HARASSMENT?

Sexual Harassment does not refer to occasional compliments of a socially acceptable nature. It refers to behavior that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with work effectiveness.

5. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE:

Internal Complaints Committee is constituted as per the above mentioned Act.

An Internal Complaints Committee shall be set-up at the Organization level of SSML and shall consist of the following members as nominated by SSML:

- a. A Presiding Officer of the committee (ideally a senior woman employee)
- b. Two women employees preferably those who are committed to the cause of women (ideally having an experience in social work or have a legal knowledge)
- c. CGM as a default member of the committee

This committee would be in place (barring the accused or the complainant) even if a complaint arises on any of its members or the complainant is a member of the committee. (This is in case if the complaint arises on any of the members or the complainant is a member of the committee). In case the complainant or the accused is the Chairperson of the committee, the committee shall choose the senior most members among the remaining people to chair the committee meetings.

The Committee members will disclose any relationship either to the complainant or the person(s) against whom the complaint is filed.

6. REDRESSAL OF GRIEVANCE:

All the complaints would be dealt by an Internal Complaints Committee constituted for this purpose. The Committee would examine the merit of every complaint lodged and would take a decision to probe further. Every chance would be given to the complainant to freely express the issues at hand.

The Committee should identify the ways and possible means of sexual harassment in each regional/branch office and try to correct that. (This is a periodic activity of the chairperson and the ex-officio members.)



Any aggrieved woman can submit a written complaint in strict confidence to any notified member of this Committee. This complaint should be delivered in person or sent by courier or by post to the notified member of the Committee. Email complaints may be submitted at hr@sreesumangala.com , which will be monitored by the HR & Board of Directors. This complaint should be submitted within a maximum period of 3 months of the event. In exceptional cases, the Committee, with the concurrence of the management, can approve a delay up to 45 days following the end of this 3 month period. The complainant must provide six copies of the complaint along with supporting documents and names and addresses of the witness. To the extent possible, your confidentiality and that of any witness and the alleged harasser will be protected against unnecessary disclosure.

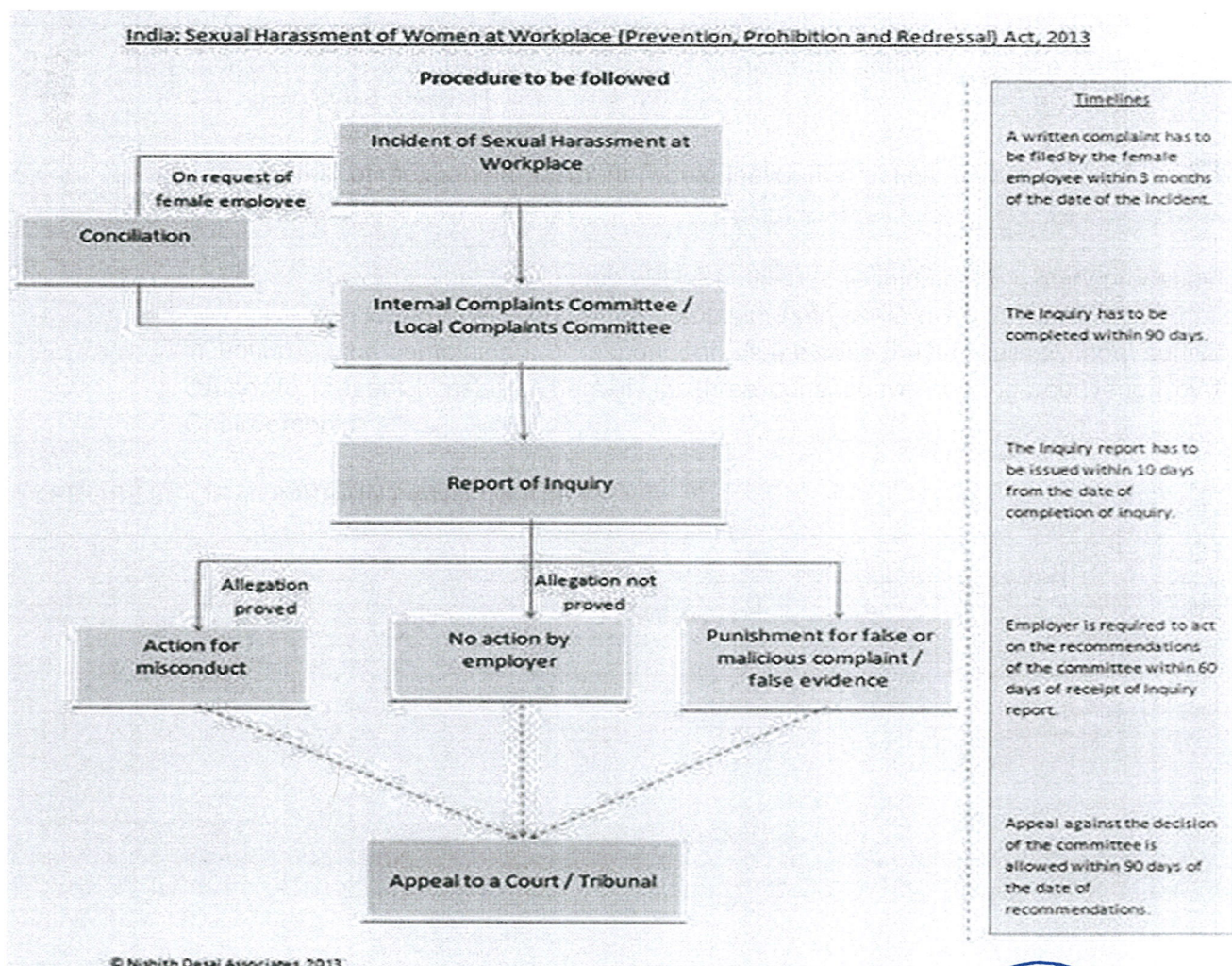
Any issue/complaint related to or qualifying the definition of 'Sexual Harassment' as accepted by SSML can be referred to the Committee. The Committee would meet only to discuss any specific complaint or to enquire about the same. The Presiding Officer of the Committee has the discretion to convene a meeting of the Committee if he/she so desires for discussing any other issue. A separate file shall be maintained by the Committee for each complaint and another one for minutes of each Committee meeting and related papers. Other files as required may be maintained as decided by the Committee.

- a. For the convenience and at the discretion of the aggrieved party, the complaint can be lodged in writing with the Unit Head of the respective unit.
- b. Any complaint lodged would be acknowledged within 5 working days of the lodged date by the chairperson of the Committee and would also be informed of the remedial action to be taken or the enquiry to be done.
- c. The affected individual would be informed of the composition of the Committee and schedule to address the issue/complaint. Upon receipt of the complaint, the Internal Complaints Committee will send a copy to the respondent within a period of seven working days and the respondent must file his reply to the complaint along with list of documents and names and addresses of witness (es) within a period of ten working days from the date of receipt of the complaint.
- d. The complainant would be protected of his/her normal working facilities and it would be seen that there would be no discrimination against him/her during any appraisal or allotment of work.
- e. When the offence amounts to misconduct under the service rules appropriate disciplinary action, up to and including termination would be initiated.
- f. The company prohibits any form of retaliation against employees for bringing bona fide complaints or providing information about harassment. However, if an investigation of a complaint shows that the complaint or information was false, the individual who provided the false information will be subject to disciplinary action, up to and including termination.



- g. When such conduct amounts to an offence under the Indian Penal Code the employer shall initiate action by making a complaint with the appropriate authority. The Indian Penal Code defines sexual harassment and punishment for offences under the Indian Penal Code and specifies the punishment, which could include imprisonment for a term that may extend to three years. SSMI will provide assistance to the Complainant if she chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law in effect.
- h. The victims of sexual harassment would have the option to seek transfer of the perpetrator or their own transfer.
- i. The Internal Complaints Committee will be entitled to terminate the inquiry proceedings or to give an *ex parte* decision on the complaint (subject to giving a fifteen days' notice in writing), if the complainant or respondent (as the case maybe) fails, without sufficient cause, to present himself or herself, for three consecutive hearings convened by the Chairperson.

7. PROCESS OF COMPLAINT AND INQUIRY



If, upon request by the aggrieved woman, the conciliation process depicted in the flowchart above commences, then the outcome will be governed by such conciliation process. However, in no event will monetary consideration be a basis of conciliation. In the event a settlement is concluded, no further inquiry shall be conducted by the Internal Complaints Committee.

8. SSMI SEXUAL HARASSMENT COMMITTEE COMPOSITION

Internal Complaints Committee Team					
S No	Name	Designation	Position in ICC	Gender	Email Address
1	Divya Sabanayagam	Presiding Officer	Chairperson	Female	divya@sreesumangala.com
2	Chitra M S	Employee	Member	Female	chitra@sreesumangala.com
3	Janani S	Employee	Member	Female	janani@sreesumangala.com
4	Ananth V	Employee	Member	Male	ananth.hr@sreesumangala.com
5	Nagarajan P	Employee	Member	Male	nagaraj@sreesumangala.com
6	Vineeta Agrawal	Trustee Dayasadan Childrens Town	External Member	Female	vineetasagrawal@gmail.com

For and on behalf of

Sree Sumangala Metals and Industries Private Limited



S/D

Karthik Sabanayagam
Managing Director
DIN 00922006

S/D

Natesan Thangavelu
Director
DIN 06426026