

# Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace

## Introduction

Greenpanel Industries Ltd. (“Company”) is committed to creating a safe working environment for all its employees, specifically the women employees, and for others who access the Company at any given time.

In pursuance of this commitment and in consonance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed thereunder (“Act”), the Company has formulated the present policy (“Policy”).

The Company has a zero tolerance to sexual harassment of employees, specifically women, at workplace and shall endeavor to ensure that no one shall be subjected to any form of harassment

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy.

Violation of this policy will call for strict disciplinary action up to and including termination.

## 1. Objective

To provide protection against and to provide for prevention of sexual harassment of women and others at workplace and for the handling and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto and in compliance with the Act and Company’s internal policies and procedures.

## 2. Scope & Eligibility

This Policy extends to all Employees, including contract/vendors employees, of the Company and is deemed to be incorporated in the service conditions of all Employees and comes into effect immediately. This Policy may be adopted for implementation by any other Unit of Greenpanel Industries Ltd. in India.

## 3. Definitions

- a) **“Aggrieved Women” means** - an Aggrieved Women, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment
- b) **“Employee” means** - a person employed at a workplace for any work on regular, temporary, adhoc, or daily wage basis, either directly or through an agent, including a contractor with or without the knowledge of the principal employer, whether for

remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

- c) **“Workplace” means** - the office premises of the Company and/or any place visited by the Aggrieved Woman/Employee arising out of or during the course of employment with the Company including transportation provided by the Company for undertaking such journey.
- d) **“Respondent” means** - a person against whom the aggrieved woman has made a complaint under Section 9 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- e) **“Complainant” means** - a Complainant is any Aggrieved Individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.
- f) **“Sexual Harassment” means and includes** but is not limited to any one or more of the following unwelcome sexually determined behaviour (whether directly or by implication) namely:
  - i. Physical contact and advances
  - ii. A demand or request for sexual favours
  - iii. Sexually coloured remarks
  - iv. Showing pornography
  - v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
  - vi. Implied or explicit promise of preferential treatment in her employment, threat of detrimental treatment in her employment or about her present or future employment status
  - vii. Interference with her work creating an intimidating or offensive or hostile work environment for her
  - viii. Humiliating treatment likely to affect her health or safety.

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

- i. Implied or explicit promise of preferential treatment in employment; or
- ii. Implied or explicit threat of detrimental treatment in employment; or
- iii. Implied or explicit threat about present or future employment status; or
- iv. Interfering work or creating an intimidating or offensive or hostile or hostile work environment
- v. Humiliating treatment likely to affect health or safety.

#### 4. Complaint Redressal

##### **Internal Complaints Committee (ICC)**

The Company has created an Internal Complaints Committee (“Committee”) for redressal of any complaints of Sexual Harassment. The Name of the Members of the Internal Complaints Committee is as per **Annexure A** of this Policy.

##### **(1) Process for filing of Complaints**

Any Aggrieved Woman/Employee may make, in writing, a complaint of Sexual Harassment at workplace to the Committee within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. The complaint can be filed using any of these modes of communication:

- a) By sending an e-mail to any of the members of the committee
- b) By regular mail, by addressing the complaint to the Committee as provided in Attachment 1 attached to this policy
- c) Provided where the complaint cannot be made in writing the Presiding officer, or any member of the (ICC) or the Chairperson or the Member of the Local Committee, as the case may be assist the aggrieved woman all help to make the complaint in writing to the (ICC).

##### **For the above purpose:**

- a) Where the Aggrieved Woman/Employee cannot make the complaint in writing, the Committee shall render reasonable assistance to the Aggrieved Woman/Employee for making the complaint in writing; and
- b) Where the aggrieved woman is **unable to make a complaint** in writing due to her physical or mental incapacity, or her death then her legal heir or such other person as may be prescribed can lodge a complaint as under Section 9 (2).
- c) Where the aggrieved woman is unable to make a complaint on account of her **physical incapacity**, a complaint may be filed by:
  - i. Her relative or friend, or
  - ii. Her co-worker; or
  - iii. Any person who has knowledge of the incident with the written consent of the aggrieved woman.

##### **(2) Resolution procedure**

Once the complaint is received, before initiating the inquiry the committee may take steps to **conciliate** the complaint between the complainant and the respondent. **This is only if requested by the aggrieved woman.**

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation happens within 2 weeks of receipt of complaint.

The committee provides copies of the settlement to complainant & respondent. Once the action is implemented, no further inquiry is conducted

If resolution through conciliation is not possible, the Committee shall **investigate** in detail into the matter of the complaint. The Committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary and must complete its investigation within a period of 90 days of initiation of investigation.

Post completion of investigation, the report will be submitted by the Committee to the employer within 10 days.

The employer will act upon the recommendations of the Committee within 60 days of receipt of Report

### **(3) Appeal**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

## **5. 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 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.

All persons who receive such complaint shall maintain absolute confidentiality and forward the same to the Committee to take action as enumerated hereunder.

## **6. Duties & Responsibilities of the Company**

- Provide safe working environment at the Workplace.
- Display at any conspicuous place in the Workplace, the consequences of the sexual harassment.
- Organize workshops and awareness programs at regular intervals for sensitizing the Employees.
- Make such information available to the Committee as is required.
- Provide assistance to the Aggrieved Woman/Employees if she so chooses to file the complaint.

- Treat sexual harassment as a misconduct and initiate action for such misconduct.
- Monitor the timely submission of reports by the Committee.
- To comply with this Policy and for supporting its objectives by demonstrating respect for fellow employees and other parties doing business with the Company.
- Encourages the reporting of all incidents, regardless of who the offender may be.
- Ensure that the complainant or witnesses shall not be retaliated against through reprisals, intimidation, coercion, or any other form of adverse action for making a good-faith report of sexual harassment or for participating in the inquiry of any such complaint
- Provide assistance to the Aggrieved Woman/Employee if she/he so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.

## **7. Amendments**

The Company reserves the right to amend the Policy from time to time in order to comply with any laws/rules/regulations that come into effect from time to time.

By order of the Board  
**For Greenpanel Industries Limited**

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Banibrata Desarkar  
Company Secretary &  
Vice President-Legal

**Date: 14-08-2019**

**Place: Kolkata**

**Annexure A**

**Internal Complaints Committee (ICC) at Corporate Office of Greenpanel Industries Ltd**

Sl. No	Member	Designation	Contact No	Email ID
1	Ms. Sagarika Ganguly	Presiding Officer	9686190848	Sagarika.ganguly@greenpanel.com
2	Ms. Sangeeta Kaushik	Member	9717257373	Sangeeta.kaushik@greenpanel.com
3	Mr. Neeladri Basu	Member	9971003568	Neeladri.basu@greenpanel.com
4	Ms. Tulika Ghosh	Member	8240434641	Tulika.ghosh@greenpanel.com
5	Mr. V. Venkatramani	Member	9748400606	v.venkat@greenpanel.com
6	Mr. Banibrata DeSarkar	Member	7044024164	Banibrata.desarkar@greenpanel.com
7	Ms. Binota Roy (Lawyer)	External Member	9830650758	Roy.binota@yahoo.com

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Banibrata Desarkar  
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