

**MODISON  
METALS LIMITED**

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Mumbai - 400021 India  
T: +91-22-2202 6437 F: +91-22-2204 8009  
E: sales@modison.com W: www.modison.com  
Cin No.: L51900MH1983PLC029783



## POLICY ON PREVENTION OF SEXUAL HARASSMENT

### **OBJECTIVE:**

The MODISONS METALS LIMITED 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. The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith

All concerned should take cognizance of the fact that Modison Metals Limited strongly opposes sexual harassment, and that such behaviour against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being the Sexual Harassment of Women at Workplace (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

### **SCOPE:**

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.

### **DEFINITION:**

**"Aggrieved Person"** means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

**"Company"** means Modison Metals Limited.

**"Employee"** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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;

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**“Internal Complaints Committee”** means a committee constituted by Company as per this Policy.

**“Respondent”** means a person against whom the aggrieved person has made a complaint.

**“Sexual harassment”** would mean and include any of the following:

- i) 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;
- ii) 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;
- iii) Eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy;
- iv) 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;
- v) Conduct of such an act at work place or outside in relation to an Employee; and
- vi) Any unwelcome gesture by an employee having sexual overtones.

**“Workplace”** includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit . Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

**APPLICABILITY:**

This Policy applies to all the employees, workers and trainees (whether in the office premises or outside while on assignment).

Where sexual harassment occurs to anyone as a result of an act by a third party or outsider while on official duty, the Company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

Explanation: “Employee” means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.



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### **COMPLAINT REDRESSAL COMMITTEE**

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

<b>Name of the person</b>	<b>Designation</b>
Mrs.Prabha Bolinjkar	Presiding Officer
Mr.Yogesh Vaghela	Member
Dr.Vedawyas	Member
Mrs.Rita Bhatia	Member

### **DEALING WITH THE COMPLAINT:**

- It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the Complaints Committee of any instance or behaviour of sexual harassment by a co-worker towards another employee
- The concerned employee shall give his complaint in writing to the Chairperson of the Committee giving details of the incident within a week of its occurrence.
- Once the complaint is received, it will be kept strictly confidential.
- The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.
- The Committee shall ensure that a fair and just investigation is undertaken immediately.
- Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.

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**ACTION:**

1. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
2. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
3. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
  - a. Take action for sexual harassment as a misconduct.
  - b. To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
  - c. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
4. Such action will be taken within 60 days of the receipt of report.

**DISSEMINATION OF THE POLICY:**

1. All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
- 2.
3. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in Modison Metals Limited during their initial Induction.
4. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.
5. Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

**COMPLAINTS MADE WITH A MALICIOUS INTENT:**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

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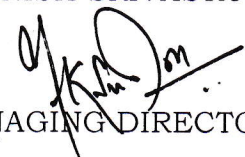
**MISCELLANEOUS:**

1. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.
  
3. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
  
3. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
  - a. Number of complaints of sexual harassment received during the year;
  - b. Number of complaints disposed off during the year;
  - c. Number of cases pending for more than 90 days;
  - d. Number of workshops or awareness program against sexual harassment carried out;
  - e. Nature of action taken by the employer.

**CONCLUSION:**

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

MANISH SRIVASTAVA

  
JT. MANAGING DIRECTOR