

Sexual and Workplace Harassment Policy

Objective

Dorf Ketal being an equal opportunity employer is committed to provide a work environment that ensures every employee is treated with dignity and respect.

In pursuit of this commitment, this policy is formed to prohibit, prevent or deter the commissions of acts of workplace harassment including sexual harassment and provide a competent forum for redressal of any grievance arising thereof.

Applicability

All Employees at All Locations

“Employee” under this policy means any person on the rolls of the company including those on deputation, contract, temporary, part time or working as consultant

“Location” under this policy means all offices or other premises where the Company’s business is conducted, all company-related activities performed at any other site away from the Company’s premises, Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Policy Guidelines

A. Definition and Scope:-

1. Sexual Harassment:- Sexual Harassment would mean and include:

- a. verbal abuse or ‘joking’ that is sex-oriented,
- b. eve teasing, sexually coloured innuendos and taunts, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, stalking, sounds, display of pictures, signs
- c. physical confinement against one’s will and likely to intrude upon one’s privacy;
- d. sexual advances (verbal, written or physical),

- e. demand or request for sexual favours,
- f. any other type of sexually-oriented conduct,
- g. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

2. **Workplace harassment** :- including but not limiting to Sexual harassment, workplace harassment would mean and include :

- a. Intimidating a person by physical assault or gestures.
- b. abusing a person loudly, usually when others are present
- c. repeated threats of dismissal or other severe punishment for no reason
- d. constant ridicule and being put down
- e. leaving offensive messages on email or the telephone
- f. sabotaging a person's work, for example, by deliberately withholding or supplying incorrect information, hiding documents or equipment, not passing on messages and getting a person into trouble in other ways
- g. maliciously excluding and isolating a person from workplace activities
- h. persistent and unjustified criticisms, often about petty, irrelevant or insignificant matters
- i. humiliating a person through gestures, sarcasm, criticism and insults, often in front of customers, management or other workers
- j. spreading gossip or false, malicious rumours about a person with an intent to cause the person harm

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

B. Resolution Action :-

1. All employees are requested to promptly report any sexual/ workplace harassment experienced by them.
2. Whenever an incident of sexual / workplace harassment occurs, the victim of such conduct can communicate his/ her disapproval and objections immediately to the harasser irrespective of any level/ position barrier and request the harasser to behave decently.
3. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal written complaint at humanresources@dorfketal.com. This email-id is handled only by the authorized grievance redressal cell comprising of company's senior most officials, who will thereafter provide advice or extend support as requested and will undertake prompt and confidential investigation to resolve the matter.
4. A concerned co-worker may also inform in writing to humanresources@dorfketal.com of any instance or behaviour of sexual/ workplace harassment by a co- worker towards another employee.
5. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees involved, shall meet him/her and record the statement.

C. Investigation Process:-

1. The Vice President HR will facilitate the investigation of any complaint received pertaining to sexual/ workplace harassment.
2. It will be ensured that a fair, unbiased investigation is undertaken immediately in line with the principle of natural justice.
3. Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions.

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 Investigating Officer the names of witness/es whom they propose to call and If required, the Investigating officer shall call upon such witness/es to provide the necessary information to assist in resolving the matter satisfactorily.
5. The Investigating officer shall share the findings with the Directors alongwith the disciplinary recommendations, who shall then finalise the resolution action which may include:-
 - a. Formal apology
 - b. Counselling
 - c. Written warning to the employee found guilty and a copy of it maintained in his/her personal file.
 - d. Financial Penalty
 - e. Demotion
 - f. Change of work assignment / transfer for either the accused or the victim.
 - g. Suspension or termination of services of the employee found guilty of the offence
6. The outcome of the investigation shall be informed to the complainant and the accused.

D. Confidentiality:-

1. To protect the interests of the victim, the accused person and others who may report incidents of sexual / workplace harassment, confidentiality will be maintained throughout the investigatory process based on the severity of the incidence.
2. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.
3. All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential and in personal custody by the Vice President - HR except where disclosure is required under disciplinary or other remedial processes.

E. Protection against Retaliation:-

1. 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.
2. Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation.
3. While dealing with complaints of sexual/ workplace harassment, the Investigating and the Resolution Panel shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused.
4. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Vice President - HR as soon as possible who will then initiate appropriate disciplinary action against any such complaints which are found genuine.

F. Complaint made with a malicious intent:-

1. 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 / workplace harassment.
2. 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.

Internal Compliance Committee for Anti Sexual and Workplace Harassment

The employees can approach the following committee in case of any issue pertaining to Sexual and Workplace harassment.

Sr. No.	Name of Committee Member	Cell No.
1	Mrs. Shraddha Kadam	7738391808
2	Mrs. Sheetal Hardas	9819406565
3	Dr. Chitrlekha Datta	7700957341
4	Mr. Santosh Jagdhane	9987567538
5	Mr. Vijay Bankar	9833535744
6	Mrs. Mini Worlikar (External)	9820378415