

## Anti-Harassment and Non Discrimination Policy

**Maini Precision Products Limited** (the “Company”) has always maintained high level of integrity and ethics, and by adhering these principles the Company has made its reputation in the Industry. The company has always maintained cordial relationship with various stakeholders like workers, employees, regulatory authorities, shareholders, society etc. The Company is committed to provide a healthy work environment which is free of discrimination and/or harassment. The company strongly prohibits any sort of discrimination/harassment on the basis of race, colour, religion, sex, national origin, citizenship, age status, disability, or any other basis prohibited by law in the workplace. The company wants to develop an environment that is respectful and productive for every employee. Any discrimination or harassment based on an employee’s, will not be tolerated. The Company adheres the **ZERO TOLERANCE** principle in the cases related to the Sexual Harassment. The Company prohibits inappropriate conduct based on any of the above characteristics at workplace (including washroom area, canteens and creches), on Company business events, or at Company sponsored events.

### Definitions

#### **(a) What Harassment means?**

Harassment is a behaviour that is unwanted, unreasonable and offensive to the recipient, which creates an intimidating, hostile or humiliating work environment for that person. There are various types of harassment which can occur at work, these can be based on:

- abusing a person loudly, usually when others are present
- repeated threats of dismissal or other severe punishment for no reason
- constant ridicule and being put down
- leaving offensive messages on email or the telephone
- 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
- maliciously excluding and isolating a person from workplace activities
- persistent and unjustified criticisms, often about petty, irrelevant or insignificant matters
- humiliating a person through gestures, sarcasm, criticism and insults, often in front of customers, management or other workers
- spreading gossip or false, malicious rumours about a person with an intent to cause the person harm.

This list is not exhaustive. Harassment can occur between people of the same sex or opposite sex.

**(b) Discrimination:**

Discrimination refers to the unjust or prejudicial treatment of different categories of people, especially on the grounds of race, age, or sex etc.

**(c) Sexual Harassment:**

Sexual Harassment has the same meaning as defined in the Sexual Harassment policy prepared pursuant to the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. **(Annexure I).**

**(d) Zero Tolerance:**

A “zero tolerance” is a policy that mandates punishments for specific offenses that are intended to be applied regardless of the seriousness of the behaviour, mitigating circumstances, or situational context.

**Applicability**

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will also not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates or any person who is in the contract obligation with the Company.

## Annexure I

### POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

**Maini Precision Products Limited** has formulated in terms of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder.

Sexual harassment at work seriously undermines the dignity of the victim and, thus, has the potential of creating a hostile work environment. Such conduct is, therefore, irreconcilable with the policy of the Company to provide a work environment free of harassment, discrimination, intimidation and insult. All employees should, accordingly, note that the Company under no circumstance shall permit or condone sexual harassment at work.

This policy is applicable to allegations of sexual harassment at workplace made by and against employees of the Company and includes complaints made by third parties, employees of vendors and customers or any visitors to Company premises.

#### 1. OBJECTIVE

- a) To promote ethical and conducive working environment by preventing and deterring sexual harassment at workplace.
- b) To prohibit sexual harassment at workplace.
- c) To lay down a clear and unambiguous procedure for addressing any complaints of sexual harassment at work.
- d) To bring awareness against sexual harassment at workplace.

#### 2. DEFINITIONS

- a) **'Act'** shall mean the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder.
- b) **'Aggrieved person'** is a person, of any age, whether or not employed with the Company, who alleges to have been subjected to any act of Sexual Harassment at Workplace.
- c) **'Employee'** means any person engaged at the Workplace, whether on regular, temporary, ad hoc or any other basis, as an agent, contractor, apprentice, probationer, trainee, intern or in any other capacity.
- d) **'Internal Complaints Committee'** shall mean the Committee constituted in terms of Section 3 hereunder.
- e) **'Respondent'** shall mean the person against whom the aggrieved person has filed a complaint of Sexual Harassment in terms of this Policy.
- f) **'Sexual Harassment'** shall mean any unwelcome act or behaviour including but not

limited to physical contact or advances, demand or request for sexual favours, making sexually coloured remarks, showing pornography, any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

- g) **'Workplace'** shall mean the Company's plants, corporate offices and all other places where the employees generally work/employed. It is not confined or limited to the actual working premises of the Company in which work may be performed as per the prescribed duty hours of the Company. It includes such locations wherein the aggrieved Person may be present in the course of performing his/her duties towards the Company such as office parties, work related social functions, phone calls, sending messages through cellular phones or email from home even on an off day, or such other work-related interactions outside office hours or Company premises.

### **3. THE INTERNAL COMPLAINTS COMMITTEE ("ICC")**

- a) The ICC must consist of a minimum of SIX (6) members viz., (i) the Presiding Officer who shall be a woman employed at a senior level at Workplace nominated from amongst the employees of the Company. Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the Workplace, (ii) an External representative who shall be a person from NGO committed to the cause of women or a social worker with at least five years' experience in handling workplace harassment or a person familiar with service, labour, civil or criminal law, (iii) two male members who shall be employees of the Company, preferably devoted to the cause of women and (iv) two female members who shall be employees of the Company, preferably devoted to the cause of women. The names of members of the ICC and their contact details shall be notified on the Notice Board of the Company
- b) At least one half of the ICC must consist of women members.
- c) The ICC shall meet once a quarter or at such intervals as it deems fit, to regularly discuss any issues pertaining to Sexual Harassment at Workplace or the need for conducting awareness sessions in the Company. The quorum for a quarterly meeting shall be a minimum of four (4) members, including the Presiding Officer.
- d) The members of the ICC shall hold office for such period as the Company may specify; which period shall not exceed three years from the date of nomination.

### **4. PROCEDURE FOR FILING A COMPLAINT**

- a) Any Aggrieved Person may make, in writing, a complaint of sexual harassment at workplace to the ICC.
- b) The complaint must be filed within a period of three (3) months from the date of incident and in case of series of incidents, within a period of three (3) months from the date of the last incident. The complainant shall file six copies of the complaint, along with supporting documents and names and addresses of witnesses, to the ICC. The ICC may, at its discretion, extend the time by another three (3) months if it is satisfied that

the aggrieved Person was prevented from filing the complaint within the stipulated time.

- c) Where the Aggrieved Person is unable to make a complaint on account of her/his physical incapacity or death or otherwise or for any other reason, her/his relative, friend, co-worker, an officer of National Commission for Women or State Women's Commission or legal heir in case of death of the Aggrieved Person or any person who has knowledge of the incident may make a complaint, as the case may be, with the consent of the Aggrieved Person (or legal heir in case of death of Aggrieved Person).
- d) Where the Aggrieved Person is unable to make a complaint on account of her/his mental incapacity or death or otherwise, her/his relative, friend, special educator, qualified psychiatrist or psychologist, the guardian or any person who has knowledge of the incident jointly with any one of the above may make a complaint.

## **5. CONCILIATION**

- a) The ICC, may, before initiating an enquiry, at the request of the Aggrieved Person takes steps to settle the matter between the Aggrieved Person and the Respondent through conciliation, provided monetary settlement shall not form the basis of such conciliation.
- b) Once settlement is arrived at, copies of the settlement shall be recorded by the ICC and copies thereof provided to the Aggrieved Person and the Respondent.
- c) Once a settlement is reached between the Aggrieved Person and the Respondent in the conciliation proceeding, no further inquiry shall be conducted by the ICC.

## **6. INQUIRY**

- a) In the event settlement is not arrived at or a conciliation process is not requested for by the aggrieved Person or in the event the terms of settlement are not complied with by the Respondent, the ICC shall proceed to make an inquiry into the Complaint filed by the aggrieved Person.
- b) The ICC shall make an enquiry into the complaint in accordance with the provisions of the Service Rules / Certified Standing Orders of the Company and where such rules do not exist, in such manner as may be prescribed by the Act. The inquiry shall be completed within 90 (ninety) days of commencement of the inquiry. For conducting the inquiry, the ICC shall have powers of a civil court to summon and enforce attendance of any person and examine him on oath, require production of documents and such other matter as may be prescribed under the Act. For conducting an inquiry, the quorum shall consist of a minimum of three members of the ICC, including the Presiding Officer.
- c) The ICC shall meet, as often as required, and examine the complaint within two (2) working days of receipt of the complaint, and within seven (7) days from receipt of the Complaint, a copy shall be furnished to the Respondent.
- d) The Respondent shall then reply to the complaint made within ten (10) working days

of receipt of a copy of the complaint.

- e) The ICC shall then conduct the inquiry into the complaint made, following the principles of natural justice. The parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC.
- f) The ICC shall have the right to terminate the inquiry proceedings or give ex-parte decision on the complaint if the aggrieved Person or Respondent fail to be present for three consecutive hearings, provided such termination or decision shall be made subject to a written notice thereof being given to the party concerned, 15 days in advance.
- g) All proceedings of the ICC pertaining to an inquiry shall be recorded in writing and will have to be signed off by the Presiding Officer, the complainant and the Respondent.
- h) The ICC may question witness from both the sides and the other side will have opportunity of cross - examining the witnesses. The ICC shall provide the Complainant and the Respondent adequate and fair opportunity to present and prosecute/defend their case. The Complainant or the Respondent shall present their case on their own or with assistance of any co-employee. No lawyers will be allowed to appear before the ICC.
- i) During the pendency of an inquiry, the ICC shall ensure that the complainant is not subject to any kind of undue pressure or coercion by the Respondent. The ICC may, at the written request of the Aggrieved Person, recommend to the Company to transfer the Aggrieved Person to another unit, grant her leave up to 90 days, restrain the Respondent from reporting on her work performance/making any report thereto or grant such other relief as the Act may prescribe.
- j) In the event the complaint of Sexual Harassment is made by or against any member of the ICC, such member shall, until the said complaint is disposed-off by the ICC, cease to be a member of the ICC and if found guilty, shall automatically and with immediate effect be removed from the ICC.

## 7. INQUIRY REPORT

- a) Within 10 (ten) days from completion of an inquiry, the ICC shall give a findings report to the Company giving details of evidence perused and the grounds and reasons based whereon the ICC has arrived at its findings.
- b) If the allegation is proven, ICC may make the following recommendations:
- c) Take action as misconduct as per the service rules of the Company and if such rules do not exist, then as prescribed by the Act.
- d) To deduct from the salary of the Respondent such sum payable to the aggrieved Person as compensation.
- e) The Company may take appropriate disciplinary action for any act of Sexual Harassment, which may be as follows:
  - Verbal Warning
  - Written Warning
  - Suspension
  - Withholding of increment
  - Written apology
  - Carrying out community service
  - Undergoing counselling
  - Termination of employment
  - Forwarding the complaint to the jurisdictional police
  - Imposition of damages/compensation
  - Any other penal remedy that may be available to the company under the applicable law.
- f) The Company shall act upon the recommendations of the ICC within sixty (60) days of receipt of the findings report.
- g) Should either party to a complaint wish to file an appeal against the recommendations of the ICC, he/she may prefer an appeal within ninety (90) days of such recommendations to the 'appellate authority' notified under Section 2 (a) of the Industrial Employment (Standing Orders) Act, 1946.

## **8. CONFIDENTIALITY**

The contents of the complaint, identity and address of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Committee and action taken by the employer shall not be published, shall not be made known to press or media in any manner. Where any person entrusted with any of the above information contravenes this obligation, the employer shall recover a sum of Rs. 5,000/- from such person.

## **9. CLARIFICATIONS**

The Company is authorized to issue clarifications, guidelines, instructions, procedures etc. under this Policy & Rules as may be required from time to time.

## **10. FALSE COMPLAINT**

In the event the ICC concludes that the complaint was false and/or malicious, appropriate disciplinary action, up to termination from employment or any other action set out in Section 7.3 above, could be taken against the aggrieved Person making such false complaint. The ICC will give a detailed reasoning for having reached the above said conclusion. This does not, however, include complaints which are difficult to prove or have been made in good faith but do not constitute sexual harassment per se.

## **11. GENERAL**

- a) This policy shall come into force with immediate effect & shall remain in force, until otherwise decided by the Company.
- b) The Company reserves the right to withdraw, review, alter &/ or amend this Policy as may be deemed necessary from time to time.
- c) This Policy shall supersede the earlier policy, rules, regulations, orders & instructions issued on the subject, except to the extent expressly provided in this Policy.