

POLICY FOR PREVENTION OF SEXUAL HARASSMENT

SAWACA BUSINESS MACHINES LIMITED

(CIN: L74110GJ1994PLC023926)

**Regd. Office: 45, Chinubhai Towers, Ashram Road, Ahmedabad –
380 009.**

Phone: 079-26587363. Email : sawaca.business@yahoo.com

Website : www.sawacabusiness.com

POLICY ON PREVENTION OF SEXUAL HARASSMENT

Sawaca Business Machines Limited provides equal employment opportunity and are committed to creating a healthy working environment that enables employees to work without fear or prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment involving employees is a grave offence and is therefore punishable. This policy provides of prevention of sexual harassment of women at workplace and for the redressal of complaints of sexual harassment.

1. SCOPE

This Policy extends to all employees of the Sawaca Business Machines Limited and is deemed to be incorporated in the service conditions of all employees.

Sexual harassment would mean and include any of the following:

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

“Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc 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.

2. INTERNAL COMPLAINTS COMMITTEE

The Company has instituted a Complaints Committees for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints:

Initially, and till the further notice the Complaints Committee will comprise of the following members:

- 1) **Presiding officer**- Woman employee at the level of Assistant General Manager or above
- 2) Senior Woman Employee from Personnel Function (**Member**)
- 3) Divisional / Plant Personnel Head/ Branch Commercial Manager or any other Senior employee of the Davison/ Location from where the Complaint has originated (**Member**)

4) Member from an NGO or Lawyer (Member)

The Presiding officer reserve the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer, at least two members, one of whom shall be a lady.

3. REDRESSAL PROCESS

Any aggrieved employee may submit a complaint of the alleged incident to any member of the Internal Committee in writing within 3 months of occurrence of incident.

The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

The Committee will have first interaction/ meeting with the Complainant within five days of the receipt of the complaint, but not later than eight days in any case.

At the first meeting/ interaction, the committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc. to substantiate her complaint. If the Complainant does not wish to depose personally due to embarrassing narration involved in it, a lady officer shall meet the complainant and record the statement.

Thereafter the person against whom complaint is made will be called for a deposition before the Committee and an opportunity will be given to him to give an explanation.

In the event the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment; the same would be dropped after recording the reasons thereof.

The internal committee shall have the powers to – i) Summon and enforce the attendance of any person and to examine him on oath, and ii) Require the discovery and production of documents

In case the complaint is found to be false/ malicious the Complainant shall be liable for appropriate disciplinary action by the Management.

4. ENQUIRY PROCESS

The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him an opportunity to submit a written explanation within 7 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

If the Complainant or the person against whom complaint is made desires any witnesses to be called, they shall communicate in writing to the Committee the names of witnesses whom they propose to call.

If the Complainant desires to tender any documents by way of evidence before the Committee she shall supply original copies of such documents. Similarly if the person against whom complaint is made desires to tender any documents in evidence before the Committees he shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.

The Committee shall call upon all witnesses mentioned by both the parties.

The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made for putting forward and defending their respective case.

The Committee shall complete the Enquiry within reasonable period but not exceeding three months and communicate its findings to the Management in writing.

The Management shall take appropriate punitive action against the erring employee keeping in view the gravity of his misconduct.

This policy will be governed in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
