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Policy Against Sexual Harassment at Workplace

1) POLICY STATEMENT:

- A- Throughout the years we, Frontier Springs Limited have always focused on our values and ethics. We are committed to creating a safe and 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. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable.
- B- The policy is made as per the statutory requirement in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2) APPLICABILITY:

This policy will extend to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. Further this policy shall be applicable to new trainees, consultants, contractors and outsourced staff associated with the Company.

3) DEFINITIONS & SCOPE:

“**Act**” means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 which extends to the whole of India.

“**Complainant**” means in relation to workplace, an employee of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

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

“**Employer**” here refers to “Frontier Springs Limited”.

“**Committee**” means an Internal Complaints Committee constituted under Section 4 of the said Act.

“**Respondent**” means a person against whom the Complainant has made complaint under section 9 of the Act.

“Workplace” includes registered office, head office, manufacturing units, administrative offices, factory premises of Frontier Springs Limited. It also includes 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.

4) WHAT CONSTITUTES SEXUAL HARASSMENT:

Sexual Harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) viz.:

- a) Physical contact; or
- b) A demand for request for sexual favours; or
- c) Making sexually coloured remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non verbal conduct of sexual nature.

5) INTERNAL COMPLAINTS COMMITTEE:

COMPOSITION:

The Company has constituted an Internal Complaints Committee to consider and redress complaints of sexual harassment. The composition of the Committee is as follows:

<u>S.No.</u>	<u>Name of Member</u>	<u>Designation</u>
1.	Mrs. Mamta Bhatia, Director	Presiding Officer
2.	Mrs. Manju Bhatia, Director	Member
3.	Mr Dhruv Bhasin (Company Secretary)	Member
4.	Mrs. Tripti Mishra	Member

QUORUM:

A quorum of the Committee is 2 members personally present for the proceedings to take place. The quorum shall include the Presiding Officer, at least two members, one of whom shall preferably be a lady.

6) REPORTING:

An employee who is the recipient of any inappropriate conduct or unwelcome behavior, indicating sexual harassment is expected and encouraged to report the same to the Internal Complaints Committee at the earliest. All precaution will be taken to protect the privacy of the recipient involved. Based on the circumstances of each case, the involved parties may choose to deal with a complaint through either an informal or formal process.

7) REDRESSAL PROCESS:

A- Any employee who is being sexually harassed directly or indirectly may submit a written complaint of the alleged incident to any member of the Committee within 10 days of occurrence of incident.

- B- The Committee shall make an entry of the complaint received in the register maintained by it for such purpose to endorse the complaint and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- C- The Committee member on receiving such complaint shall intimate the Committee head and will thereafter hold a meeting with the Complainant for discussing the complaint raised within one week of receipt of the complaint.
- D- Complaints must be brought within 3 months of the incident of sexual harassment and within 180 calendar days for ex-employees of the Company.
- E- At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. 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 and record the statement.
- F- Thereafter, the Committee shall summon the respondent for the purposes of a deposition before the Committee and an opportunity shall be given to such person to give an explanation to the allegations, where after, an "Enquiry" shall be conducted and concluded.
- G- Complaints made anonymously or by a third party must also be investigated to the extent possible. 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.
- H- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

8) ENQUIRY PROCESS:

- A- The Committee shall immediately proceed with the enquiry and communicate the same to the complainant and respondent.
- B- The Committee shall prepare and hand over the Statement of Allegation to the respondents and give him / her opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- C- The Complainant shall be provided with a copy of the written explanation submitted by the respondents.
- D- If the Complainant or the respondents desires the Committee shall take testimonies of other relevant persons and review relevant evidences wherever necessary. The Complainant and the respondent shall have the right of cross examination of all witnesses.
- E- The Committee shall provide every reasonable opportunity to the Complainant and to the respondents, for putting forward and defending their respective case.
- F- The Committee shall arrive at a decision after carefully and fairly reviewing the circumstances, evidences and relevant statements. It shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Board of Directors of the Company. The Board will direct appropriate action in accordance with the recommendation proposed by the Committee.

G- The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

9) CONFIDENTIALITY:

It shall be the duty of all the persons involved in the inquiry process to ensure that all complaints lodged are treated with utmost confidentiality. Any breach of this can invite disciplinary action before, during or after the inquiry.

10) APPEALS AND ALTERNATE REMEDIES :

Either party subjected to administrative or disciplinary action may appeal against such actions to the Board of Directors of Frontier Springs Limited within 7 working days after conclusion of the investigation and communication of the consequences.

Additionally, nothing in this policy shall prevent the complainant or the respondent from pursuing formal legal remedies or resolution through Govt. agencies or the courts of law of the country.

11) EVALUATION OF POLICY:

The Sexual Harassment Policy shall be evaluated so that any amendments required may be recommended by the Committee based on their experience of dealing with complaints.

The exercise shall be an annual exercise at the minimum. The Policy will be flexible to amendments to address situations that the policy has not covered at the onset.

12) ANNUAL REPORT:

The Internal Complaints Committee will prepare an Annual Report as per the Act comprising the following details:

- a) Number of complaints of sexual harassment received in the year
- b) Number of complaints disposed off during the year
- c) Number of cases pending for more than ninety days
- d) Number of workshops or awareness program against sexual harassment carried out
- e) Nature of action taken by the employer.