

Respectful Workplace Policy and Internal Complaints Committee

1. Introduction:

1.1 Grind Master Machines Pvt. Ltd. (GM) recognizes its responsibility to build and maintain a respectful workplace where all employees are treated with dignity and disrespectful behavior of any kind is strictly prohibited. A safe working environment is conducive to achieving strong and productive industrial relations, better reputation and greater productivity.

1.2 Therefore, GM adopts this Respectful Workplace Policy in an effort to create a culture of respect and to ensure compliance with the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 (SHWWA, 2013).

2. GM's Respectful Workplace Policy:

GM defines a respectful workplace as one that values:

- Diversity
- Dignity of the person
- Courteous conduct
- Mutual respect, fairness and equality
- Positive communication between people
- Constructive attitude towards conflict resolution

To this end:

- ***GM does not single anyone out because of what they look like, where they come from or who they are. All individuals associated with GM Workplace can expect to be treated respectfully.***
- ***Harassment, discrimination or any form of disrespectful behavior will amount to misconduct and will be dealt with strictly.***

2.1 While the SHWWA, 2013 addresses specifically sexual harassment of women employees, GM's policy extends its provisions to all employees and encompasses other forms of harassment as well. The responsibilities, prohibitions and consequences for policy violation listed herein apply to all individuals including members of the management, permanent and contract employees, interns, trainees or any other person in the course of the organizations' work. It applies to the workplace itself as well as to activities connected with the workplace such as travel, conferences, work related social gatherings, a client's home or a client's work site. It applies to relationships and interactions between employees and clients/general public.

2.2 With a primary focus on prevention of harassment at the workplace GM has provided training programs to all employees and management personnel regarding this policy and implications of violation. In addition, certain behaviors have been

prohibited. Procedures for redressal have also been laid down. In compliance with the SHWWA, 2013 an Internal Complaints Committee has been constituted for redressal of complaints of sexual harassment.

2.3 This policy document lays down the bare minimum standard and provides an indicative list of disrespectful behaviors. Behaviors not explicitly listed within the policy, but falling within its framework will also be viewed as policy violations. Any violation of this policy shall amount to misconduct and will be dealt with strictly in accordance with the provisions laid down herein.

3. Definitions

3.1 Harassment/ Disrespectful Behavior includes any conduct based on:

- Age
- Disability
- HIV status
- Domestic circumstances
- Sexual orientation
- Gender
- Race
- Color
- Language
- Religion
- Caste

That is unreciprocated or unwanted and that affects the dignity of men and women at work.

****Unwanted** means conduct that is not requested or invited by the recipient, and that the recipient finds to be undesirable or disrespectful. **Whether the behavior is unwelcome is a subjective question judged by the person alleging harassment.** In this regard, how the conduct is perceived and experienced by the recipient is important, not the intention behind the conduct.

****Reasonable action** taken in a reasonable manner by the management/ supervisor to transfer, demote, discipline, counsel, retrench or dismiss an employee does not constitute harassment.

3.1.1 Types of Harassment:

a. **Abuse of Authority** is the improper use of a position of influence, power or authority by a staff member or non-staff personnel against another staff member or non-staff personnel or a group thereof. This is particularly the case when the person in question uses his or her influence, power or authority to arbitrarily influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion) of another staff member or non-staff personnel. It can include:

- Verbal Abuse
- Willful Negligence towards an employee

- Intentional Withholding of Information
- Discriminatory Abuse (Favouritism, Stereotype, Prejudice)
- Abuse of Trust

b. *Hostile Environment* may take the form of words, gestures or actions that tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or that create an intimidating, hostile or offensive work environment. It can include:

- **Physical:** Unwelcomed contact, leering, brushing up against someone, sexual gestures, invading personal space, shoving, pushing, being aggressive, throwing things, banging doors, isolating someone
- **Verbal/visual:** Jokes, double meaning statements, written or oral comments of a sexual nature, threats, insults, derogatory pictures, stories offensive to groups of people, offensive emails, symbolic objects, slurs, graphics and sexually explicit materials downloaded from websites.

3.2 Workplace does not only include physical places where work is performed during the eight daily working hours, such as the office or factory. A workplace also includes all locations where employment-related business is conducted as a result of employment responsibilities or the employment relationship, in locations such as work-related social functions, conferences, training sessions, official business travels, business lunches and dinners, promotional campaigns organized for clients or partners, telephone conversations and communications through electronic media. A workplace therefore extends to locations and working hours outside the eight daily working hours in the office or factory.

3.3 Sexual Harassment includes any one or more of the following unwelcome acts of behaviour (whether directly or by implication) namely:-

- Physical contact and advances
- A demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

**The decisive factor in classifying a behavior as sexual harassment is the unwelcome nature of the behavior. Besides the 'unwanted' criterion, offensive behavior can also lead to sexual harassment.

**Interaction that is based on mutual consent is not sexual harassment. Sexual harassment does not refer to occasional compliments that are socially and culturally acceptable and appropriate.

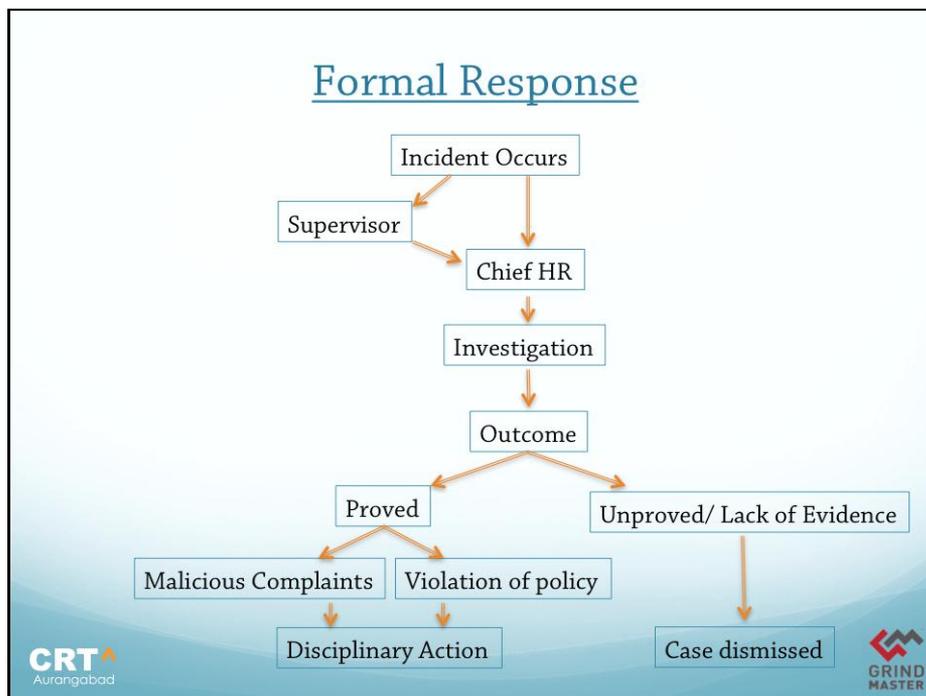
4. Response to Harassment:

Any behaviors at the workplace that fall within the definition of harassment provided within this policy can be dealt with informally depending on the situation and the persons involved. The person alleging harassment, the alleged harasser as well as a supervisor/ manager can participate and facilitate such a resolution.

The informal response is most effective when:

1. The person alleging harassment can approach the alleged harasser **directly**, thus ensuring confidentiality and quick resolution
2. The person alleging harassment can approach the alleged harasser **immediately**, thus ensuring that remedial action can be taken quickly and avoiding recurring incidents
3. The person alleging harassment can communicate to the alleged harasser as **specifically** as possible the behavior that was perceived as harassment thus allowing the alleged harasser to understand and rectify behavior

However, when an informal resolution is not possible, the policy lays down the following procedure for resolution:



Incident: The person alleging harasser is encouraged to document the alleged harassing behavior in as much detail as possible. (Eg. Save harassing text messages or emails, keep record of the people who were present when the incident occurred etc.)

Reporting to Supervisor/ Chief HR: The person alleging harassment may submit a complaint to the supervisor or Chief HR in writing within 3 months from the date of incident or in the case of series of incidents, within a period of 3 months from the date of last incident. Where such complaint cannot be made in writing, the supervisor or Chief HR shall provide reasonable assistance to the complainant for making the complaint in writing. An extension of 3 months can be provided if it is satisfied that the circumstances were such which prevented the complainant for filing a complaint within such period and reasons for the same shall be recorded.

Where a complainant is unable to make a complaint due to his/her physical or mental incapacity or death, his/her legal heir or such other person prescribed, may make the complaint on his/her behalf.

In keeping with the aim of creating a respectful work culture third party intervention is encouraged i.e., people are encouraged to report disrespectful behavior that they witness irrespective of who it is aimed at.

Before initiating an inquiry, the supervisor/ chief HR at the request of the complainant can take steps to settle the matter through conciliation. No monetary settlement shall be made as a basis of conciliation. The method of conciliation shall be adopted only if the complainant agrees to it. If the settlement is arrived, the ICC shall record the settlement and forward the same to the employer to take action as specified in the recommendation. The copy of the settlement must be provided to the complainant and the respondent. No further inquiry shall be conducted once a settlement is reached.

Investigation: If no conciliation is sought or if any term or condition of the settlement arrived has not been complied with by the alleged harasser, an inquiry into the complaint will be carried out. In cases of sexual harassment the Internal Complaints Committee will carry out the inquiry. For other forms of harassment, an investigation officer will be appointed by the Committee to carry out the inquiry.

During the course of inquiry both parties will be given an opportunity of being heard and a copy of findings will be provided to both enabling them to make representations before the Committee.

The Committee/ Investigation Officer has the power of:

- Summoning and enforcing the attendance of any person and examining him under the oath.
- Requiring the discovery and production of documents.
- Any other matter which may be prescribed.

The inquiry must be completed within a period of 30 days. Under exceptional circumstances an extension upto 90 days may be ok.

During pendency of the complaint on the request of the complainant, the Committee/ Investigating Officer may recommend the employer to-

- Transfer the complainant or respondent to any other workplace (Team/Place/Shift)
- Grant leave to the complainant up to a period of 1 months.
- Grant any such relief, which it may think fit.

The Internal Complaints Committee for cases of sexual harassment will, at any given point in time have:

- 50% female representation
- One external representative