



**POLICY ON PREVENTION OF SEXUAL HARASSMENT
OF WOMEN AT WORKPLACE**



KLJ RESOURCES LIMITED
REGD. OFFICE : 8 CAMMAC STREET KOLKATA 700017
CIN: L67120WB1986PLC041487



1. COMMITMENT:

KLJ Resources Limited (hereinafter referred to as 'Company') is committed to creating a safe and healthy working environment that enables its employees to work without fear of prejudice, gender bias and a harassment free workplace to all employees without regard to race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual Harassment of Women at the work place or other than workplace if involving an employee or employees is a grave offence and is therefore, punishable under the applicable laws.

The Supreme Court of India has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment. This policy takes complete cognizance of the latest legislation by the Government of India i.e. "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and the relevant rules issued thereunder. This Act is to provide protection against sexual harassment of Women at Workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected or incidental thereto.

At the "Company" all employees are expected to uphold the highest standards of ethical conduct at the Workplace and in all their interactions with Business Stakeholders. This means that employees have a responsibility to

- Treat each other with dignity and respect.
- Follow the letter and spirit of Law.
- Refrain from any unwelcome behavior that has sexual connotations.
- Refrain from creating hostile atmosphere at workplace via sexual harassment.
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the Company.



2. SCOPE:

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. Local country laws will take precedence over this policy, in other geographies, if applicable.

“Sexual Harassment” would mean and includes any of the following but not limited to:

(i) Any unwelcome sexually determined behavior such as physical contact or advances, requests or demand for sexual favours, either explicitly or by implication, in return for employment, promotion or evaluation of a person towards any company activity;

(ii) Any unwelcome sexual determined behavior involving verbal, non-verbal or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, SMS or email communications, gestures, showing of pornography, physical contact or molestation, stalking, sounds, display or pictures, signs, verbal or non-verbal communication which offend the individual’s sensibilities and affects his or her performance at the workplace.

(iii) Eve-teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon the Individual’s privacy.

(iv) Any act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other gender, such as presence or occurrence of circumstances of implied or explicit promise of preferential treatment in employment; threat of detrimental treatment in employment; threat about present or future employment; interference with work or offensive work environment; or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation or humiliating treatment likely to affect the person’s health or safety.

When a man uses with a sexual purpose, the body or any part of it or any object as an extension of the body towards a woman without her consent or against her will, such conduct will amount



to sexual assault.

2.1 It is clarified that it is the reasonable perception of the woman that would be relevant in determining whether any conduct was sexually determined and, if so, whether such conduct was unwelcome or not and that her objection would disadvantage her in connection with her

education or employment, including evaluation, grading, recruitment or promotion, or when it creates a hostile working environment.

2.2 It is further clarified that “Hostile Environment” is said to be created when any act of Sexual Harassment has the purpose or effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive employment / environment.

2.3 Every employee is free to directly approach the person alleged to harass that employee and request that the harassing behaviour be immediately stopped, before approaching the Internal Complaints Committee formally with the Complaint of Sexual Harassment.

This policy applies to all categories of employees of the Company, including trainees and employees on contract at their workplace or at client sites. The Company will not tolerate any act of sexual harassment of Women if engaged in by clients or by suppliers or any other business associates. The workplace includes:

1. All offices or other premises where the Company’s business is conducted.
2. All company-related activities performed at any other site away from the Company’s premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

3. DEFINITION OF SEXUAL HARASSMENT:

Aggrieved Individual

An aggrieved Individual in relation to a workplace, is a person, of any age, whether an employee



or not, who alleges to have been subjected to any act of Sexual harassment.

Complainant

A Complainant is any aggrieved individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this policy.

Employee

An Employee means a person employed with the Company for any work on permanent, deputation, temporary, consultant, part time, 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Respondent

A respondent means the person against whom the Complainant has made a complaint.

Workplace

- Premises, locations establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company.
- Places visited by the Employee arising out of or during the course of Employment including official events, transportation and accommodation provided by the Employer for undertaking such journey.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

- All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.
- All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.



5. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Internal Complaints Committee**” shall be created in the Company for time-bound redressal of the complaint made by the victim.

6. INTERNAL COMPLAINTS COMMITTEE:

The Company shall constitute an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The Internal Complaints Committee will comprise of such persons as members and

shall have a Presiding Officer who fulfill the requisite criteria as provided in Section 4 of The Sextual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act,2013.

Further, the Units of the Company situated at Mumbai and Silvassa shall also constitute an Internal Complaint Committee in accordance with the Act.

The Presiding Officer and every member of the Internal Complaints Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the Employer.

The Internal Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment

7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:



A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaints Committee for redressal of their grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

2. The Presiding Officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, if the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record her finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the



assistance of the Internal Complaints Committee.

4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

5. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board of Directors as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint.

The Board of Directors shall approve corrective action on the recommendations of the Internal Complaints Committee and consequent to the approval of the Board, the Internal Complaints Committee shall ensure the implementation of the same and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
- b. Counselling
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the perpetrator or the victim.
- e. Suspension or termination of services of the employee found guilty of the offence.

6. 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. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.



To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

9. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

10. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

11. REVIEW OF THE POLICY

The adequacy of this Policy shall be reviewed and reassessed by the Internal Complaints Committee periodically and appropriate recommendations shall be made to the Board to update the Policy based on the changes that may be brought about due to any regulatory amendments or otherwise.



PROCESS FLOW

Communication of Result →



