

SIMPLEX PROJECTS LIMITED

ANTI-SEXUAL HARASSMENT POLICY OF SIMPLEX PROJECTS LIMITED

I. COMMITMENT:

Simplex Projects Ltd. (SPL) is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

We are also committed to promoting a work environment that is conducive to the professional growth of all its employees and encourages equality of opportunity.

SPL is also committed to take all necessary and expedient steps to ensure that its employees are not subjected to any form of harassment and will not tolerate any form of sexual harassment at its workplace.

II. SCOPE:

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 any project sites. The Company will not tolerate sexual harassment, 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 locations 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.

III. DEFINITION OF SEXUAL HARASSMENT:

In addition to the circumstances defined under Section 3(2) of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Sexual Harassment at the Workplace shall include:

1. verbal, written or physical abuse or 'joking' that is sex-oriented
2. demand or request for sexual favours or unwelcome sexual advances or any other type of sexually-oriented conduct,
3. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

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IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

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

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Internal Complaints Committee**” has been created by the Company for time-bound redressal of the complaint made by any victim of sexual harassment at the workplace.

VI. INTERNAL COMPLAINTS COMMITTEE:

The Company has instituted an Internal Complaints Committee for timely and expedient redressal of sexual harassment complaint (made by any victim) and for ensuring time bound treatment of such complaints.

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

1. Mrs. Shweta Shroff- Presiding Officer of the Committee
2. Mrs. Udit Bajaj
3. Mr. Joydeep Dutta
4. Mr. Bhabya Nath Thakur- NGO Representative

The Complaints Committee is responsible for:

- Investigating every complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment
- Updating the Anti-Sexual Harassment Policy of the Company, in order to ensure the prevention of sexual harassment and safety of women employees at work place.
- Organize workshops and awareness programs at regular intervals.

VII. 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 any 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.

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If the harassment does not stop or if 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 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, written or oral, complaint to the Presiding Officer of the Internal Complaints Committee. The complaint shall have to be lodged within 15 days from the date of occurrence of the alleged incident, preferably in writing, 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 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, 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 this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Internal Complaints Committee and any other employee, as deemed fit.
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 Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to The Chairman & Managing Director and The Manager- HRD of the Company, as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Chairman & Managing Director and The Manager- HRD shall ensure that the corrective actions, as per the recommendations of the Complaints Committee, are undertaken on timely basis and keep the complainant informed of the same.

Corrective action may include, but shall not be limited to, any of the following:

- i. Formal apology from the accused.
- ii. Counseling of the victim and the accused.
- iii. Written Warning to the perpetrator and maintenance of the same in the employee's file.

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- iv. Change of work assignment / transfer for either the perpetrator or the victim.
 - v. 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, in consultation with the Internal Complain Committee.

(For detailed explanation, refer to the pictorial representation of the process flow given in Annexure A)

VIII. 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 any other person who may be involved in the matter, confidentiality will be maintained throughout the investigatory process, to the extent practicable and appropriate under the circumstances.

IX. 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.

X. 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.

XI. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

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Annexure A

PROCESS FLOW

