

SACHETA METALS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN WORKPLACES

OBJECTIVE:-

SACHETA METALS LIMITED (The "SML") is committed to creating and maintaining a secure work environment where its Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The SML is committed to creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all its employees have the human right to be treated with dignity. Sexual Harassment at the work place or in the course of official duties, if involving employees of the Company shall be considered a grave offence, and is therefore punishable under the applicable laws.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

The Government of India has made effective on April 23, 2013 a law called 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 on prevention of sexual harassment against female employees at the workplace. Any person making unwelcome physical contact and explicit sexual overtures, demanding or requesting sexual favours, making sexually coloured remarks or showing pornography against the will of a woman shall be guilty of the offence of Sexual Harassment and Section 354A of the Indian Penal Code 1860 prescribes punishment for this offence, ranging from simple to rigorous imprisonment, for term one year to three years, or with fine, or with both.

SCOPE:-

The SML's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company. The SML encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy. The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices/branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for

undertaking such visit. The SML's Policy against sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsource employees. 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.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

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.

DEFINITION OF SEXUAL HARASSMENT:-

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.

Sexual Harassment at the workplace includes:-

- unwelcome sexual advances (verbal, written or physical),
- demand or request for sexual favours,
- any other type of sexually-oriented conduct,
- verbal abuse or 'joking' that is sex-oriented, comments etc.
- 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 and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

COMPLAINTS COMMITTEE:-

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the 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 out of which at least two members will be of the same gender as that of the complainant:

- Head-Corporate HR (**Presiding Officer**)
- Employee at the level of Assistant General Manager or above from Personnel & Administration Department (**Member**)
- Divisional Personnel Head of the Division from where the complaint has originated (**Member**)
- Compliance Officer or CFO (**Member**)

COMPLAINT REPORTING AND RESOLUTION:-

Anyone associated with SML who believes she/he has been subjected to harassment may submit a written complaint to any of the members of the Internal Complaints Committee. The written complaint should identify the parties involved; describe the harassing behavior, including when and where it occurred; and identify by name or description any witnesses. Written complaints should be treated as confidential and should be provided directly and only to the appropriate designated individuals as listed above.

Each complaint will be dealt with in accordance with the following:

Confidentiality:-

Any allegation of discrimination or harassment brought to the attention of the Committee will be discreetly addressed. Investigations will be conducted in a confidential manner to the greatest extent possible. However, the investigation of complaints may also require disclosure to the accused individual and to other witnesses for the purpose of gathering pertinent information. In such case, disclosures will be limited to the extent possible. All participants in the process, including the person who filed the complaint, the individual accused and witnesses, will be advised to keep the matter confidential.

Cooperation:-

SML expects the all the employee including directors, senior management personal and staff co-operate fully in the investigation process. Any faculty or staff member who is the subject of, or potential witness regarding, a harassment complaint and refuses to cooperate in an investigation is subject to disciplinary action.

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.

CONCLUSION:-

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

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.