

# POLICY OF THE COMPANY UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

# **OBJECTIVE**

Interiors & More Limited ('the Company') is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

# **DEFINITION:**

# **Sexual Harassment**

a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.

b) Verbal forms of Sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.

c) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.

d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

**Aggrieved woman**: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors. Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved woman.

**Employee**: A person employed at the workplace, for any work on regular, temporary, 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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or by any other such name.

**Workplace**: In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Nestlé India Limited, including transportation provided for undertaking such a journey.

Employer: A person responsible for management, supervision and control of the workplace



# The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment, as defined in (a) above, may amount to sexual harassment:—

- (i) Implied or explicit promise of preferential treatment at work; or
- (ii) Implied or explicit threat of detrimental treatment at work; or
- (iii) Implied or explicit threat about present or future employment status; or
- (iv) Interference with work or creation of an intimidating or offensive work environment; or
- (v) Humiliating treatment likely to affect health, safety or self-esteem.

# What's Not Sexual Harassment Within limits, following are acceptable and not considered as instances of sexual harassment:

- Performance counselling
- Social interaction
- Showing concern
- Encouragement
- Polite compliment
- Friendly conversation.

# SCOPE:

The coverage of the policy shall apply to any person including Intern, Contractors, Employees aggrieved irrespective of the gender and have faced sexual harassment in any form at work place and the policy shall extend to parking area of the company, office of the company including rented shops and team outings.

# POLICY STATEMENT

a) All employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.

b) All employees will understand and appreciate the rights of the individual to be treated with dignity.

c) All employees are required to maintain a work environment, which is free from any kind of harassment.

d) Employees will refrain from committing any acts of sexual harassment at work place.

e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.

f) Employees will be protected against victimization, retaliation for filing or reporting a Complaint on sexual harassment and will also be protected from false accusations.



# **Internal Complaints Committee (ICC)**

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Complaints Committee" is constituted at each location. The detail of the committee is notified to all covered persons at the location (workplace).

In compliance with Section 4 of SHWPR Act, ICC shall have following members:

Sr	Name		Designation in the Company			Designation	in	the
no.						committee		
1	Kuntal Sharma		Company	Secretary	and	Presiding officer		
			Compliance Officer					
2	Mayuri		Graphic Designer			Member		
	Nandiwadekar							
3	Mahindra		Cashier			Member		
	Lalpuria							
4	Krupa	bharat	Founding m	ember of NG	D(WE	Member		
	thakkar		CAN WE W	(ILL)				

# **Reporting Procedure/ redressal Mechanism**

Any complaint/grievance should be reported to ICC through any of the following within 3 months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident on Email Id: <u>info@inm.net.in</u> or Contact Number:9167028209. It should be noted that the information shall be kept confidential but not anonymous.

The Complaint needs to be filed in writing. Before commencing enquiry, ICC may and at the request of aggrieved women, take steps to settle the matter through conciliation. No monetary settlement shall be made as a basis of conciliation. Where settlement has been arrived through conciliation, ICC shall record the settlement so arrived and forward the same to the Company to take appropriate actions and provide the copies of the same to the parties. After settlement, no further inquiries shall be conducted by ICC.

In case no settlement is agreed between the parties, ICC shall proceed with the inquiry proceedings.



# PROCEDURE FOR DEALING WITH COMPLIANTS OF SEXUAL HARASSMENT

a) If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Department Head.

b) Ideally, the complaint should be lodged immediately or within a reasonable period 3 months from the date of incident/last incident.

c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.

d) The complaint committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.

e) Any victimization of, or retaliation against, the complainant or any employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.

# **DISCIPLINARY ACTION**

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

Sexual harassment will not be tolerated at Interiors & More Limited If the outcome of an investigation by the Internal Complaints Committee shows that harassing behaviour has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

## **ACTION TO BE TAKEN AFTER INQUIRY**

Post the inquiry the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry. The findings and recommendations are reached from the facts established and is recorded accurately. If the situation so requires, or upon request of the complainant, respondent or witness, Management at Interiors & More Limited may decide to take interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

## COMPLAINT SUBSTANTIATED

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counselling
- ii. Censure or reprimand



- iii. Apology to be tendered by respondent
- iv. Written warning
- v. Withholding promotion and/or increments
- vi. Suspension
- vii. Termination

or any other action that the Management may deem fit. The employer at Interiors & More Limited acts upon the recommendations within 60 days and confirm to the committee

# COMPLAINT UNSUBSTANTIATED

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the company.

## NOTE:

In case of any malicious/false allegations or false evidence or where documents produced are found to be forged/ misleading, the ICC may recommend to the company to take appropriate action against such person, in accordance with the service rules or in such manner as may be prescribed.

## Appeal

Subject to provisions of Section 18 of the SHWPR Act, any person aggrieved from the recommendation made by ICC/Local Compliant Committee, may appeal to the appellate authority notified by the respective State Government under the Industrial Employment (Standing Orders) Act, 1946.

## Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner.