

ESL STEEL LIMITED

POLICY & MANUAL/PROCEDURE FOR SEXUALHARRASSMENT AT WORKPLACE

I. COMMITMENT:

ESL Steel Ltd. is committed to provide a safe and conducive working environment free from sexual harassment. ESL Steel Ltd. is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity. ESL Steel Ltd. takes the responsibility to ensure that every woman is treated with dignity and respect and afforded equitable treatment. ESL Steel Ltd. will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that- its women employee are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all categories of employees of ESL Steel Ltd, including permanent management and workmen, probationers, temporaries, trainees and employees on contract at its workplace. It also applies to women not being an employee of ESL Steel Ltd. but present at ESL Steel Ltd. workplace.

The workplace includes:

1. All offices or other premise where ESL Steel Ltd. business is conducted.
2. All company-related activities performed at any other site away from the ESL Steel Ltd. premises.

III. DEFINITION OF SEXUAL HARASSMENT:

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

Sexual Harassment at the workplace includes:

1. Physical contact and advances; or
2. A demand or request for sexual favors; or
3. Making sexually coloured remarks; or

4. Showing pornography; or
5. Any other unwelcome physical, verbal or non-verbal of sexual nature.
6. Implied or explicit promise of preferential treatment in employment; or
7. Implied or explicit threat of detrimental treatment in employment; or
8. Implied or explicit threat about present or future employment status; or
9. Interference with work of creating an intimidating or offensive or hostile work environment;
or
10. Humiliating treatment likely to affect health or safety.

IV. RESPONSIBILITIES OF ESL STEEL LIMITED REGARDING SEXUAL HARRASMENT

ESL Steel Ltd. take the responsibility to: -

- (a) Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- (b) Display at conspicuous places in the workplace, the policy, the penal consequences of sexual harassment, and the name of the members of internal complaint committee.
- (c) Organize workshop and awareness programs at regular intervals for sensitizing the employees and orientation programs for the members of the Internal Committee **with** the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and rules thereto in the manner as may be prescribed..
- (d) Provide necessary facilities to the internal committee for dealing with the complaint and conducting an inquiry.
- (e) Assist in securing the attendance of respondent and witnesses before the internal committee;
- (f) Make available such information to the internal committee, as it may require having regard to the complaint made under sub-section (I) of section 9 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.
- (g) Provide assistance to the woman if she so chooses to file a complaint in relation to offence under the Indian Penal code or any other law for the time being in force.

- (h) Cause to initiate action, under the Indian penal code or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place.
- (i) Treat sexual harassment as misconduct and initiate action for such misconduct against the delinquent employee.
- j) Monitor the timely submission of report by the internal committee

IV. COMPLAINT MECHANISM:

Whether or not such conduct constitutes an offence under the law or a breach of the service rules, an appropriate complaint mechanism in the form of "**Complaints Committee**" has been created in ESL Steel Ltd. for time-bound redressal of the complaint made by the victim_

V. INTERNAL COMPLAINTS COMMITTEE (ICC):

ESL Steel Ltd. has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints as per provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and rules thereto.

Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least 2 members will be women.

The format of the Internal Complaints Committee will be as follows: _

SI No	Name	Designation in the Internal Complaints Committee	Organization
		Presiding Officer	ESL Steel Ltd.
		Member	ESL Steel Ltd.
		Member	ESL Steel Ltd.
		Member	NGO

The existing Internal Complaints Committee of the company is shown in Annexure B

The 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

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

ESL Steels provide a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

1. When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to behave decently.
2. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she can bring her concern to the attention of the Complaints Committee

for redressal of her grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

8. Complaints:

1. Any 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 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 her name, department, division and location she is working in, to enable the presiding officer to contact her 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 mean an offence of Sexual Harassment, she 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, she will proceed to investigate the allegation with the assistance of the Complaints Committee as per provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and rules thereto.

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 complaint committee shall make inquiry into the complaint in accordance with the principles of natural justice before reaching any conclusion.

6. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Unit Head/Directors as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Unit head/ Director will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
 - b. Counseling
 - 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 as per the service rule by the Management.

VI. CONFIDENTIALITY:

ESL Steel Ltd. understand 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 any investigatory process to the extent practicable and appropriate under the circumstances.

VII. 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.

VIII. PROTECTION TO COMPLAINANT/ VICTIM:

ESL Steel Ltd. are committed to ensure that no employee who brings forward procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

IX. CONCLUSION:

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

PROCESS FLOW



