

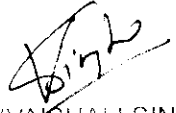
STERLING TOOLS LIMITED (STL)

Policy on Prevention of Sexual Harassment

Contents

I.	Objective
II.	Scope
III.	Guidelines
IV.	Definition of Sexual Harassment
V.	Preventive Measures
VI.	Reporting of Sexual Harassment Complaints
VII.	Confidentiality
VIII.	Assurance against Retaliation
IX.	Complaints Reporting Channel
X.	Complaint Mechanism
XI.	Enquiry Procedure
XII.	Procedure of Submission
XIII.	Criminal Proceedings
XIV.	Mala Fide Complaints
XV.	Professional Consequences Violation of the Policy
XVI.	Conclusion
XVII.	Schedule A: List of Members of Internal Complaints Committee
XVIII.	Schedule B: Format of the Complaint

STERLING TOOLS LIMITED


(VANSHALI SINGH)
Company Secretary

1. Objective

The occurrence of sexual harassment in the workplace, any reference to sexism, gender stereotyping or gender based discrimination and need for healthy, safe environment for all workers including women has been taken note of and the Hon'ble Supreme Court has laid down guidelines for its prevention and deterrence in 1997. Whereas the sexual harassment results in violation of fundamental rights of a women to equality under Article 14 and 15 of the Constitution of India ("Constitution") and right to life and live with dignity under Article 21 of the Constitution and her right to practice any profession or to carry on any occupation, trade or business which includes right to safe working environment. The protection against sexual harassment and right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women ("Convention"), which has been ratified on 25th June, 1993 by the Government of India. Based on the guidelines framed by the Hon'ble Supreme court of India in Vishaka versus State of Rajasthan and the statute ratified vide Convention, the Government of India, Ministry of Law and Justice has constituted the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") and made it effective from December 09, 2013.

In deference to the aforesaid guidelines, STL is committed to providing and promoting a safe, healthy and congenial atmosphere irrespective of gender, caste, creed or social class of the employees. STL in its endeavor to provide a safe and healthy work environment for all its employees has developed a policy to ensure zero tolerance towards verbal, physical, psychological conduct of a sexual nature by any employee or stakeholder that directly or indirectly harasses, disrupts or interferes with another's work performance or creates an intimidating, offensive or hostile environment such that each employee can realize his / her maximum potential.

This policy is meant to sensitize the employees about their fundamental right to have safe and healthy environment at their workplace and what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event, and in the chance of an occurrence, to enable a fair mechanism for dealing with such conduct STL has constituted Internal Complaint Committees ("ICC") for its units located at DLF, Faridabad, WDU, Ballabgarh and Prithla, Palwal (Haryana) as per the guidelines of the Act

II. Scope

The Prevention of Sexual Harassment Policy is applicable: -

- a) To all consultants and employees of Sterling Tools Limited which as per section 2 (f) of the Act, means any person who has been employed as regular, temporary, ad hoc or on daily wages basis either directly / through an agent / contractor (with/ without the knowledge of the principal employer, with or without remuneration / voluntary under express / implied terms of employment and shall include contract worker / probationer / apprentice / Executive Trainees / Management Trainees, etc. hereinafter defined as "Employees /Consultants"
- b) To employers, which as per section 2 (f) of the Act, shall mean any person authorized / designated to be the employer within the means of the Act by STL.
- c) On office premises and all areas which can be termed as notional extension of employer's premises. It also includes 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. The incident is covered during / after office hours.

- d) All the visitors & vendors associated with us & visiting any premises of the company, or whose premises our employees visit during the course of business.

The respective ICC is required to enquire all Complaint made under the provisions of the Act and as per this Policy / guideline in just and fair manner and submit their report to the respective Employer (s), as the case may be. It is pertinent to mention that the Employer only has the right to punish any accused hereunder and ICC is an advisory body to meet the ends of justice.

Any act of sexual behavior is included if such an act is perceived to be detrimental to a healthy and congenial work environment. This act is only applicable when both or either the alleged harasser i.e the Respondent (defined hereinafter) & a Person who has been subject to Sexual Harassment i.e. the Complainant (defined hereinafter) are employees / consultants of the company. In the event any employee experiences any act of sexual harassment at any place other than its workplace and / or extended workplace, the Employer is obligated to provide all the assistance, support and help to the said employee for redressal of his / her Complaint.

III. Guidelines

It is mandatory on all employees / consultants to follow this policy and the guidelines formulated herein. Sexual Harassment at the work place will be deemed to be a violation/breach of terms of employment, and a criminal offence in addition to violation of gender equality guaranteed under the constitution.

IV. Definition of Sexual Harassment

For the purpose of this Policy, Sexual Harassment shall include:

1. Any form of verbal or physical behaviour which is unsolicited and unwelcome and interferes with an individual's work performance by creating an intimidating / insecure working environment. Unwelcome sexually determined behaviour (whether directly or by implication) in any form, such as:
 - a) Physical contacts and advances;
 - b) A demand or a request for sexual favours;
 - c) Sexually coloured remarks;
 - d) Showing pornography;
 - e) Any other unwelcome physical, verbal/non-verbal conduct of sexual nature.
2. Where any of these acts is committed in circumstances where the Complainant has a reasonable apprehension that in relation to the Complainant's employment or work whether drawing salary, or honorarium or voluntary, whether in public or private enterprise such conducts can be humiliating and may constitute a health and safety problem.

This list is illustrative and not exhaustive and applicable irrespective of gender.

3. Definitions for reference:

Complainant: can be a Person who has been subject to Sexual Harassment and / or any Person reporting an incident of Sexual Harassment. A third party can also be a Complainant, however, a written Complaint from the Person who has been subject to Sexual Harassment is mandatory to be filed with the respective ICC as the case may be.

Respondent: The person who is alleged / reported to have committed an act of Sexual Harassment.

V. Preventive Measures

1. Each of the Committees will meet half yearly and in the event of any complaint filed then within 3 days of filing of said Complaint. Minutes of the Meeting ("MoM") of the same will be prepared and submitted by the Committee to the Employer. The quorum for the meeting of the Committee would constitute of at least three members present in person or at least fifty percent of the total members of Committee whichever is higher.
2. At the end of every Financial Year an annual report containing all the details like number of Complaints filed, the stage of each Complaint and number of Complaints redressed will be prepared and furnished by the respective Employer to the respective local District Commissioner / D. M. / Officer.
3. Sensitization programmes / workshops would be organized, meetings would be convened for all employees as well as special meetings to be conducted with only the women employees by the respective ICC on a regular basis in order to do the following:
 - a) To sensitize employees about their right to have safe and healthy work environment
 - b) To spread awareness about same either by way of publication, advertisement or by convening meetings
 - c) To discuss with women employees on general issues involving challenges faced by them at work place, if any and workshops on various aspects of the Act.
 - d) Increase awareness amongst employees and overcome the hesitation and discomfort in discussing issues involving Sexual Harassment at work place by convening open town hall meetings so that employees can come up in open and share their views and ideas;
 - e) The Committee would also assist Complainants if required to file a Complaint
4. Introduce a system to record names of employees who have to stay late (beyond 8PM) in office with reasons. Security on duty need to visit the work places every half an hour post 8 PM.
5. Maintain records of all sexual harassment cases and findings

VI. Reporting of Sexual Harassment Complaints

Any aggrieved person who feels / presumes that he / she has been subject to sexual harassment by a person, including a supervisor, manager, employee of other organisation or vendor by way of any action or words should immediately report or complain the incident to the respective ICC as set forth below as the case may be or to any member of respective ICC within three months from the date of occurrence of the said incident and in case of a series of incidents within a period of three months from the date of the last incident. Delay in reporting makes it more difficult to establish the facts of a case and may contribute to the repetition of offensive behaviour.

If a Complaint cannot be made in writing, any member of the respective ICC as the case may be shall render all reasonable assistance to the aggrieved person for making the Complaint in writing.

VII. Confidentiality

The company will do everything consistent with enforcement of this policy and with the law to protect the privacy of the individuals involved and to ensure that the Complainant and the Respondent are treated fairly. Information about individual Complaints and their disposition is considered confidential and will be shared only on a "need to know" basis. However, the ICC and / or Employer shall not be held responsible under present confidentiality clause in the event the Complaint is filed by a third party and / or material facts with regard to Complaint are already known to other persons / individuals.

Further, once the Complaint is redressed by the respective ICC, as the case may be the Employee should share the information with all employees with regard to the filing, redressal and disposal of the Complaint in a fair and timely manner without disclosing name of the Complainant and Respondent.

VIII. Assurance against Retaliation

This policy seeks to encourage all employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or Complaint of sexual harassment. Retaliation against persons who report or provide information about sexual harassment or behaviour that might constitute sexual harassment is also strictly prohibited. Any act of reprisal, including internal interference, coercion, and restraint, by an employee, violates this policy and will result in appropriate disciplinary actions.

Such disciplinary action will be proposed by the Committee as per the provisions of the Act and as per this Policy / guideline and on the recommendation of the respective Committee the Employer, as the case may be would ensure implementation of same.

IX. Constitution of Committee

1. A Complaint should be made to the respective ICC of STL as case may be .
2. Each member of the Committee will hold office for not more than three years.
3. Each Committee is mandatorily required to involve an external member (a senior member of an NGO or other body who is familiar with the issues of sexual harassment) during the enquiry of Complaint(s) and formalization of the Report in connection therewith.
4. The constitution of ICC Committee at respective Plant is provided in **Schedule A**, herein.

X. Complaint Mechanism

1. A Person who has been subject to Sexual Harassment may make in writing a Complaint of sexual harassment at workplace to the Committee within a period of three months from the date of incidence and in case of series of incidences within a period of three months from the date of last incidence. Provided that where such Complaint cannot be made in writing, the presiding Chairperson or any member of the respective ICC or the chairperson shall render all reasonable assistance to the Complainant for making the Complaint in writing.

2. If the Committee is satisfied that the circumstances were such that prevented the Complainant from filling the Complaint within said period they can extend the time limit not exceeding three months.
3. The Complainant is required to send the written Complaint to the respective ICC either by way of the letter detailing Complaint or may also email the Complaint to the Chairman of the Committee. The Complaint may be made in the format provided in **Schedule B**, herein or in such manner containing all the information as provided in **Schedule B**.
4. It is pertinent to mention that the written Complaint is mandatorily required to be filed by the Complainant with full name and details for seeking any action under this Policy and / or the Act. Any anonymous Complaint shall not be entertained.
5. Where the Complainant is unable to file the Complaint of their own, their legal heirs or parents, spouse, children or sibling can file the Complaint.
6. A third party can also be a Complainant however, a written Complaint from the Person who has been subject to Sexual Harassment is mandatory to be filed with the respective ICC as the case may be.
7. Both written / emailed Complaint must provide the details of the incident together with the name/s of the Respondent/s and the Complainant/s as available

XI. Enquiry Procedure

1. A timely enquiry of Complaints of sexual harassment is of utmost importance. Normally, the enquiry shall be concluded and acted upon at the earliest from the date of the Complaint being made in writing.
2. The respective ICC, as the case may be will conduct an enquiry and provide an opportunity to the Complainant as well as the Respondent to represent their case and explanations / reasoning thereto.
3. In the event any Complaint is received, the following procedure shall be followed by the respective ICC:
 - a) An enquiry is initiated through the members of respective ICC, as the case may be as advised by the Chairperson at the earliest after receiving the Complaint in writing / email.
 - b) The enquiry seeking detailed information / explanation/ reasoning will be conducted with the Complainant as well as Respondent independently by the respective ICC.
 - c) The enquiry proceedings convened by respective ICC should always be minuted and / or video recorded and same to be saved and maintained for records by the respective ICC as the case may be. The proceedings of the enquiry (while the witness makes his/ her submission) should be recorded on camera.
 - d) On submission of report the respective ICC shall consider the report at the earliest and, on being satisfied for the need, may order full enquiry into the Complaint.
 - e) It is important to mention herein that the respective ICC on receipt of any Complaint from the Complainant should upfront seek his / her expectation

from the ICC with regard to Complaint and the respective ICC should also brief the Complainant about the option of conciliation available to him / her with the Respondent, if so desired by the Complainant. However, once the enquiry is initiated the option of conciliation cease to exist.

- f) The respective ICC will study the findings and shall then proceed to deal with the Complaint in accordance with the Policy and the Act and redress the Complaint within ninety (90) days from the date of receipt of the Complaint and accordingly submit its detailed finding and advise in connection with the Complaint to the respective Employer, as the case may be.
- g) However, the respective ICC may close the enquiry and / or is not required to initiate same in the event the Complainant fails to appear before the respective ICC and / or fails to revert to the query(s) raised by the respective ICC for three consecutive events. The respective ICC shall record the reasons for closure of the Complaint accordingly. Further, in the event the Respondent deliberately avoids his / her appearance before the respective ICC, the employer or any person so appointed by the employer should direct / instruct the Respondent to appear before the respective ICC.
- h) Thereafter, the respective ICC will present the decision including handover of all the collected material i.e. the duly signed statement of the Complainant, Respondent, witnesses, involved parties and material objects if any.
- i) In the event that there are no eyewitnesses, the respective ICC may have to resolve a sexual harassment claim based on the credibility of the parties. Circumstantial evidence also would play important role during the decision making process by the Committee.
- j) The employer may seek clarification from the respective ICC on the recommendation and will implement the same.
- k) The final decision shall be communicated to the Complainant and the Respondent.
- l) An enquiry in connection with any Complaint may be initiated / continued irrespective of the fact that police proceeding has also been initiated in connection with the said Complaint.

XII. Procedure of Submission

The enquiry Committee / Member/s of the Committee should be prepared to deal with the Complainant's embarrassment and anger by patiently, but firmly, explaining the detail and documentation that are needed for an accurate enquiry.

1. The Complainant should be interviewed first, to ensure that all important details and witnesses are identified promptly and if any material object is provided the same should be received, numbered and preserved.
2. It is important for the respective ICC to be objective and non-judgmental and allow the Respondent to respond to each allegation. The respective ICC should inform the Respondent of the type of disciplinary action that may be taken if the Complaints are found to be true.
3. Both parties should be told to avoid contact with one another, and ways to minimize contact should be implemented.
4. The Complainant should report any further incidents of harassment or retaliation during the continuance of enquiry.
5. Witnesses should be told as little as possible about the details of the Complaint in order to maintain confidentiality under the Policy.

XIII. Criminal Proceedings

1. Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the respective Employer (as the case may be) based on the findings and advice of the respective ICC may initiate appropriate action in accordance with law by making a Complaint with the appropriate authorities.
2. The respective ICC would provide assistance to the aggrieved if they chose to file Complaint under the Indian Penal Code.
3. The respective ICC would ensure that Complainants or witnesses are not victimized or discriminated against while dealing with Complaints of sexual harassment.

XIV. Mala Fide Complaints

1. If the enquiry reveals that the Complaint is unjustified or Complainant had raised the concern with ulterior motives, Employer or any person duly authorized by the Employer will counsel the Complainant and recommend suitable action to prevent recurrence.
2. However, the Employer or any person duly authorized by the Employer will ensure that the Complainant is not victimized.

XV. Professional Consequences of Violation of the Policy

1. Any employee, supervisor or manager who is found to have violated the harassment policy (whether sexually harassing another employee of opposite sex or the same sex or if any person falsely accuses another person of sexual harassment) shall be subject to appropriate disciplinary action.
2. The organisation shall not tolerate any form of retaliation against employees for bringing bona fide Complaints or providing information about harassment.
3. However, as per the findings of the enquiry of a Complaint it is found out that the Complaint was false or was made with a mala fide intent, the Complainant may be subject to disciplinary actions, up to and including termination.
4. If any act of sexual harassment occurs as a result of an act or omission by any third party or outsider, the respective Employer will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

XVI. Conclusion

At STL, we endeavor to provide conducive and healthy work environment where the relationship amongst the employees as well as with the Employer are cordial and supporting in all aspects, so that each employee shall have an enriching experience. The objective of this policy is to ensure our employees that STL is determined to provide them excellent, comfortable, safe and healthy work environment, so that they can come out with their best in all facets. Notwithstanding anything contained in this Policy, the Schedules herein shall be an integral part of this Policy.

SCHEDULE A

List of Members of ICC Committee:

Name	Position
Ms. Kiran Mehta	Chairperson (Social Worker)
Ms. Pragya Saxena	Member
Mr. Pankaj Gupta	Member
Mr. Ram Avtar Aggarwal	Member

You can write us on: icc@stlfasteners.com

SCHEDULE B

Format of the Complaint

Name of the Complainant	
Designation	
Organisation & Department	
Location	
Date	
Complaint Report in Details	
	Signature: