

TEXEL INDUSTRIES LIMITED
(L29100GJ1989PLC012576)

**POLICY ON PREVENTION OF SEXUAL
HARASSMENT AT WORKPLACE**

REGISTERED OFFICE

**Block No. 2106, Santej – Khatraj Road,
Nr. Shah Steel, Vill: Santej,
Tal: Kalol (N.G) 382 721
Dist: Gandhinagar, Gujarat.
India.**

**Phone No. : 8980026110/220
Fax No.: +91 – 2764 – 286334
Email : info@geotexelin.com**

1. **POLICY:**

The **Texel Industries Limited (TIL)**, is an equal employment opportunity company and is committed to creating and providing a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

The Company is committed to promoting a work environment that is conducive to the professional growth and the Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. **SCOPE:**

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract, working as consultants etc. 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 site 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.

3. **DEFINITION OF SEXUAL HARASSMENT:**

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical), demand or request for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
2. unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually, letters, phone calls, e-mail, showing of pornography, physical contact or molestation, stalking, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
3. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
4. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;

5. Conduct of such an act at work place or outside in relation to an Employee of TIL, or vice versa during the course of employment; and,
6. any other type of sexually-oriented conduct,

4. 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.

5. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Complaints Committee**” has been created in the Company for time-bound Redressal of the complaint made by the victim.

6. COMPLAINTS REDRESSAL 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. The Chairperson and members of the committee are as follows:

Name	Category	Designation
Mr. Shailesh R. Mehta	Managing Director	Chairman
Ms. Jasmin Nahidaktar Vhora	Independent Director	Member
Mr. Ketan V. Trivedi	HOD- HR	Member

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

7. REDRESSAL PROCEDURES

- a. Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 (Ten) days of occurrence of incident.
- b. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

- c. The Committee will hold a meeting with the Complainant within 5 (Five) days of the receipt of the complaint, but no later than a week in any case.
- d. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- e. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- f. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- g. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

There are two options for Redressal of any incident / complaint of sexual harassment:-

A. Informal Resolution Options

When an 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.

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

B. Complaints:

An 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 Chairman or any other member of the Complaints Redressal 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 their name,

department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

The Chairman or any other member of the Complaints Committee to whom the application is addressed 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.

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 person to whom the complaint is addressed will record this finding with reasons and communicate the same to the complainant.

If the Committee determines that the allegations constitute an act of sexual harassment, they will proceed to investigate the allegation/(s).

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.

8. 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 others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

9. 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.

10. 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 Committee may recommend to the HOD-HR action which may include transfer or any of the other appropriate disciplinary action.

Where sexual harassment occurs as a result of an act or omission by any third party or outsider who is related to the company's activities, TIL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

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.

11. 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.

Place: Santej

**Sd/-
Shailesh Mehta
Managing Director**