



POLICY FOR PREVENTION OF SEXUAL HARASSMENT
Of
PARADEEP PARIVAHAN LIMITED

Approved by Board on the Meeting held on Dt.05.06.2024

POLICY FOR PREVENTION OF SEXUAL HARASSMENT

1. INTRODUCTION

Paradeep Parivahan Limited “The Company” is an equal employment opportunity company and is committed to creating a healthy working environment that enables Senior Officials to work without fear of prejudice, gender bias, and sexual harassment. The Company also believes that all Senior Officials of the Company have the right to be treated with dignity.

Sexual harassment at the workplace or other than work if involving Senior Officials is a grave offense and is, therefore, punishable.

2. DEFINITION

The term Sexual Harassment is defined in Section 2 (n) of the ‘Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013’ as any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

- a) Physical contact or advances; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or nonverbal conduct of sexual nature;

This policy is to prohibit and deter any employee/ staff employed with the Company any form advancing any form of sexual harassment in the way Senior Officials behave with each other. This applies equally to relations between superiors and subordinates as well as between peers. Any incident of sexual harassment will be viewed with extreme seriousness. A complaint or report of sexual harassment will be immediately investigated and appropriate action will be taken against the offending employee or Senior Officials. For every incident of Sexual Harassment, the accused/ respondent shall be prosecuted under the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as ‘the Act’) and such other laws enforced in India at the time of the commission of the offense

3. INTERNAL COMMITTEE

The Company hereby constitutes an Internal Complaints Committee (from now on referred to as ‘Committee’) as required under section 4 of the Act. The Committee has been established to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously; The committee will be headed by one senior most female employee of the organization and two other Senior Officials from legal back ground shall be the member of the committee.



4. PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT

- i) Any employee who experiences sexual harassment may make a complaint reporting the incidence of Sexual Harassment in writing to the Committee. In case the employee is unable to report the said incident in writing, the committee member shall render all the necessary resources & support to the aggrieved employee to make the complaint in writing. The Contents of the said complaint should narrate the incident of Sexual Harassment and should also contain the name and details of the accused employee.
- ii) The aggrieved employee shall report the said incident within a period of three months from the date of the last incident.
- iii) The Committee may before initiating an inquiry and at the request of the aggrieved person take steps to settle the matter between her and the accused, provided that the settlement shall be in form of conciliation and not monetary settlement. On arriving at a settlement, the settlement shall be formally recorded and shall be forwarded to the employer, the parties to the conciliation and the Committee.
- iv) On failing conciliation, the Committee will immediately arrange to fully investigate all relevant details of the matter. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the affected employee. The employee or Senior Officials, who have allegedly committed the offense, would be given all reasonable opportunity to be heard by the Committee.
- v) The result of this investigation will be formally recorded and communicated to the Director, along with a recommendation for appropriate action.
- vi) The Committee will normally complete this process and make its first formal recommendation within 15 days after receiving the complaint unless there are exceptional circumstances.
- vii) In the case of a multi location context, one of the committee members may travel to the location in question as is required to ascertain the facts based on which the committee would discuss and assess the complaint in question.
- viii) Necessary action will then be taken with regard to the offending employee or Senior Officials based on the circumstances and seriousness of the offense.
- ix) Where the company is legally advised that any such incident constitutes a criminal offense, the company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action, against the offending employee, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, suo moto, start the internal inquiry/ investigation and recommend appropriate action.
- x) The company will ensure that the career interests of the complainant are not adversely affected by the individual having drawn attention to such an offense. In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by, reasons that are clearly unconnected with gender issues, would be viewed very seriously by the company and an appropriate action shall be taken against such complainants.
- xi) If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the senior executives concerned with the relevant business or location. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee.



Heads of departments and Senior Managers at all company locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.



Place: Paradeep
Date: 05.06.2024