

POLYCAB

POLYCAB INDIA LIMITED

POSH POLICY

<i>Particulars</i>	<i>Date</i>	<i>Version</i>
<i>Policy adopted</i>	<i>August 30, 2018</i>	<i>1.0</i>
<i>Policy revised and approved</i>	<i>October 23, 2019</i>	<i>1.1</i>
<i>Policy revised and approved</i>	<i>May 13, 2021</i>	<i>1.2</i>
<i>Policy reviewed and approved</i>	<i>May 06, 2025</i>	<i>1.3</i>

- 1. Background:** Polycab India Limited (hereinafter referred to as the "Polycab") is committed to provide equal opportunity and a harassment free workplace notwithstanding race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. With a view to create a safe and conducive work environment, this Policy has been framed, in line with the provisions of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" of India (hereinafter referred to as the "Act") and existing rules framed thereunder namely the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the "Rules").
- 2. Applicability:** This Policy covers all employees of Polycab India Limited and is applicable with immediate effect.
- 3. Scope:**
 - a) This policy applies to all employees full-time, part-time, trainees and those on contractual employment of the Company at their workplace.
 - b) The Policy also applies to the Employees of business associates ("associated parties") who visit workplace for official duties.
 - c) 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.
- 4. Objective:** Provide every employee and associated parties the right to work in an environment free from sexual harassment, intimidation or offensive behaviour and in which issues of harassment shall be resolved without fear of reprisal.
- 5. Definitions:**
 - a) "Respondent" means a person against whom complaint is made.
 - b) "Employee" means person employed on workplace for full-time, part-time, including person employed as trainees and on contract basis.
 - c) "Internal Complaints Committee / Complaints Committee / Internal Committee": An internal complaints committee constituted under Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 "The Act"
 - d) "Presiding officer": means the Presiding Officer of Internal Complaints Committee nominated under sub-section 2 of section 4 of the Act.
 - e) "Sexual harassment" would mean and include any of the following:
 - i. Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
 - ii. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affects her/his performance;
 - iii. Eve teasing, and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

- iv. 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;
 - v. Conduct of such an act at workplace or outside in relation to an Employee at Polycab, or vice versa during the course of employment;
 - vi. Any unwelcome gesture by an employee having sexual overtones;
 - vii. It is sexual harassment if a Superior requests sexual favours from a junior in return for promotion or other benefits or threatens to sack for non cooperation. It is also sexual harassment for a boss to make intrusive inquiries into the private lives of employees, or persistently ask them out. It is sexual harassment for a group of workers to joke and snigger amongst themselves about sexual conduct in an attempt to humiliate or embarrass another person.
- f) "Management" means the Chairman & Managing Director or any other person(s) authorised by him

6. Responsibility regarding sexual harassment:

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

7. Complaint Mechanism:

An appropriate complaint mechanism in the form of Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

8. Constitution of Internal Complaints Committee:

A Committee shall be constituted by the Management called the Internal Complaints Committee to consider and redress complaints of Harassment at every office/ administrative units/ workplace/ factory location of the Company.

The Presiding Officer and Members of the Committee are as follows:

Sr. No.	Category	Name of the designated member
1	Presiding Officer	Senior level woman employee of the Company
2	Member	Minimum Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge
3	Member from an NGO / Lawyer (Member) / any external body	Amongst Non-Government Organization or Association committed to the cause or a person familiar with the issues relating to sexual harassment.

The ICC shall be reconstituted by the Management from time to time in compliance with the Act and the rules framed thereunder

- a) A quorum of three members is required to be present for the proceedings to take place. The quorum should include the Presiding officer, at least two members, one of whom shall be a lady.
- b) The Presiding officer and every member of the committee shall hold office not exceeding 3 years from the date of their nomination.
- c) The member appointed from amongst non - governmental organization or associations shall be paid such fees or allowances for holding the proceedings of the internal committee as may be prescribed.
- d) Where the presiding officer or any member of the Committee:
 - i. Contravenes the provisions of section 16 of the Act. (disclosure identity of aggrieved women, respondent and witnesses); or
 - ii. Has been convicted of an offence or an enquiry into an offence under any law for the time being in force is pending against him / her; or
 - iii. He / she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
 - iv. Has so abused his/ her position as to render his/her continuance in office prejudicial to the public interest.

Such presiding officer or member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provision of section 4 of the Act.
- e) The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.
- f) The internal committee shall in each calendar year prepare in such form and at such times as may be prescribed an annual report and submit the same to the management and District Officer.
- g) The Complaints Committee is responsible for
 - i. Inquire into every formal written complaint of sexual harassment
 - ii. Make appropriate recommendations and remedial measures to respond to any substantiated allegations of sexual harassment
 - iii. Discouraging and preventing employment-related sexual harassment

9. Complaint

- a) 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 conduct inquiry to resolve the matter.
- b) Any employee who feels and is being sexually harassed, may submit a complaint of the alleged incident, giving the details of such harassment to the any of the members of the Committee in writing with his/her signature within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident.

- c) Provided further that the Internal Committee or, as the case may be, the Local Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding another three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.
- d) Where the aggrieved woman is unable to make complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.
- e) The Committee shall maintain a register to endorse the complaint received by it and keep the contents confidential, except to use the same for discreet investigation.
- f) The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but not later than a week in any case.
- g) The Committee may before initiating an inquiry at the request of the complainant takes steps to settle the matter between the complainant and the accused through conciliation.
- h) At the first meeting, the Committee members shall hear the Complainant and record the her statement under oath. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate the 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.

The Committee shall forward a copy of the complaint to the respondent alongwith supporting documents and name of the witnesses within 7 working days of receipt of the same and the respondent needs to reply within 10 working days alongwith supporting documents and name of witnesses. The Complainant shall be provided with a copy of the reply submitted by the respondent.

- i) Thereafter, the accused may be called for a deposition before the Committee and an opportunity will be given to provide an explanation and any corroborative material i.e. documentary proof, oral or written material, etc., to substantiate his contentions, whereafter, an "Enquiry/" shall be conducted and concluded. Where both parties are employees, the parties shall during the course of enquiry be given an opportunity to be heard and a copy of the finding shall be made available to both the parties enabling them to make representation against the findings before the Internal Complaints Committee
- j) 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.
- k) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

- l) The Committee shall within 5 days proceed with the inquiry and communicate the same to the Complainant and the accused.
- m) The Committee shall prepare and hand over a Statement of Allegation to the accused and give an opportunity to submit a written explanation if such person so desires within 7 days of receipt of the same.
- n) The Complainant shall be provided with a copy of the written explanation submitted by the accused.
- o) If the Complainant or the accused desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- p) If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the accused desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- q) The Committee shall call upon all witnesses mentioned by both the parties.
- r) The Committee shall provide every reasonable opportunity to the Complainant and to the accused, for putting forward and defending their respective case.
- s) The Committee shall complete the "Inquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Management. The report of the committee shall be treated as an inquiry report on the basis of which an erring employee can be awarded appropriate action by way of Warning (Verbal / Written) / Suspension / Termination. appropriate action.
- t) The Management will direct in accordance with the recommendation proposed by the Committee.
- u) Corrective action may include any of the following:
 - i. Formal apology
 - ii. Counselling
 - iii. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - iv. Change of work assignment / transfer for either the perpetrator or the victim.
 - v. Suspension or termination of services of the employee found guilty of sexual harassment.

10. Duties of Management:

Management shall:

- a) Provide a safe working environment at the workplace which shall include safety from the person coming into contact at the workplace.
- b) Display at any conspicuous place at the workplace, the penal consequences of sexual harassment and regarding constitution of internal committee.

- c) Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the act and orientation programmes for the members of the internal committee in the manner as may be prescribed.
- d) provide necessary facilities to the Internal Committee for dealing with the complaint and conducting inquiry.
- e) assist in securing the attendance of the accused 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.
- g) provide assistance to the woman employee if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force
- h) cause or initiate action under the Indian Penal Code or any other law for the time being in force, against the perpetrator or the if the aggrieved women employee so desires where the perpetrator is not an employee in the workplace at which the incidence of sexual harassment took place
- i) treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.
- j) monitor the timely submission of reports.

11. Confidentiality:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. 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 process.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

12. Protection to Complainant/Victim:

The Company, while dealing with complaints of sexual harassment will not victimize or discriminate against the complainant or witness who brings forward a harassment concern. is subject to any form of reprisal and reprisal will be subject to disciplinary action.
