

	UNITECH PLASTO COMPONENTS PRIVATE LIMITED	Doc No	UPCL/ESG/D/01C
		Date of Doc	08/01/2024
		Rev No	00
	SEXUAL HARASSMENT POLICY	Supersede	00

1. Objective and Purpose of the Policy:

This Policy shall deal with all allegations/complaint(s) of Sexual Harassment committed by an Employee(s) against a woman as referred herein above, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises but that constitutes workplace. All Complaints in connection with alleged Sexual Harassment of women at Unitech Plasto Components will be addressed in compliance and in accordance with the provisions of Sexual Harassment at workplace (Prevention, Prohibitions and Redressal) Act 2013.

2. Scope of the Policy:

This policy applies to all employees including the contract workers who are involved in the operations of the Unitech Plasto Components.

3. Definitions of the Policy:

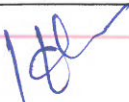
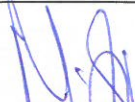
3.1 Employee” for the purpose of this policy, an employee is a person employed at Unitech Plasto Components payroll or person deployed at the workplace, for any work on regular, temporary, or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or by any other such name.

3.2 “Employer”, means any person responsible for the management, supervision, and control of the workplace.

3.3 “Aggrieved woman”: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.

3.4 “Respondent”: A person against whom a complaint of sexual harassment has been made by the aggrieved woman.

3.5 “Workplace”: In addition to the place of work all other offices and premises such as office, Shop floor, stores of the factories or other premises where the business has been conducted will be

PREPARED BY	REVIEWED BY	APPROVED BY
HR	PLANT HEAD	MANAGING DIRECTOR
		

	UNITECH PLASTO COMPONENTS PRIVATE LIMITED	Doc No	UPCL/ESG/D/01C
		Date of Doc	08/01/2024
		Rev No	00
	SEXUAL HARASSMENT POLICY	Supersede	00

considered as an workplace including the transportation provided by the company for undertaking such a journey.

4. Sexual Harassment

4.1 Sexual harassment is unwanted conduct of a sexual nature. Physical conduct of a sexual nature includes all unwanted physical contact.

4.2 Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.

4.3 Any other unwelcome physical, verbal, or non-verbal gesture or conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.

4.3 Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

4.4 The sexual harassment would also mean in the following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment, as defined above and an act that constitutes sexual harassment within the meaning of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

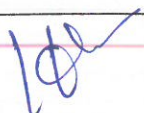
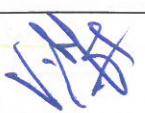
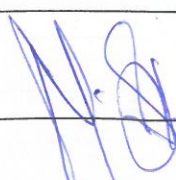
- Implied or explicit promise of preferential treatment at work; or
- Implied or explicit threat of detrimental treatment at work; or
- Implied or explicit threat about present or future employment status; or
- Interference with work or creation of an intimidating or offensive work environment;
- Humiliating treatment is likely to affect health, safety or self-esteem.

5. **Internal Compliant Committee:**

The Internal Complaint Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise of the following:

- One Presiding Officer who shall be a senior level woman employee of the Company;

PREPARED BY	REVIEWED BY	APPROVED BY
HR	PLANT HEAD	MANAGING DIRECTOR
		



**UNITECH PLASTO COMPONENTS
PRIVATE LIMITED**

SEXUAL HARASSMENT POLICY

Doc No

UPCL/ESG/D/01C

Date of Doc

08/01/2024

Rev No

00

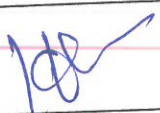
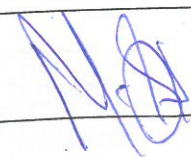
Supersede

00

- b) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- c) One External member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment, whose fee shall be fixed by the management and revised from time to time.
- d) Each member of the Internal Complaints Committee shall hold the position for three (3) years from the date of nomination.
- e) The Presiding Officer or the members can be removed from the Internal Complaints Committee due to contravention of any of the provision of the Act or other disqualifications as defined in the Act.

6. Procedure for the Grievance Handling:

- a) An aggrieved woman ("Complainant") may lodge a complaint of Sexual Harassment ("Complaint") against an ("Respondent") who could be an employee or anyone else upon whom this policy is applicable, with any of the members of the Panel or through whistle Blower platform within time not later than three months from the date of occurrence of the alleged incident. However, it is expected.
- b) that any such matter must be reported as early as possible to the Internal Complaint Committee without any delay in the larger interest of justice.
- c) If the Complainant feels that she cannot disclose her identity for any reason with the Panel members, she can address the complaint to the Managing Director of Unitech Plasto Components/Whistle officer of the Company or management, whereupon the process shall be undertaken in accordance with law.
- d) Such a Complaint shall necessarily be in writing or video her email and the Complainant shall sign at the foot of each page of the Complaint with the date and time of such incident.
- e) The Complaints Committee will hold a meeting with the Complainant within a period of seven days of the receipt of the complaint and advance intimation in writing will be given to the Complainant of the same. However, in the event the complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the Complainant, in writing.
- f) A copy of the complaint shall be shared with the Respondent with some advice to submit his/ her reply along with supporting documents and the names and addresses of the witnesses, within a period not exceeding 10 working days from the date of receipt of the documents.

PREPARED BY	REVIEWED BY	APPROVED BY
HR	PLANT HEAD	MANAGING DIRECTOR
		

UNITECH PLASTO COMPONENTS HR DOCUMENTATION

	UNITECH PLASTO COMPONENTS PRIVATE LIMITED	Doc No	UPCL/ESG/D/01C
		Date of Doc	08/01/2024
		Rev No	00
	SEXUAL HARASSMENT POLICY	Supersede	00

g) The Complainant shall be granted an opportunity to record her statement to prove her allegations and may record the statement of an employee as witness, and produce corroborative material with documents, etc., to substantiate her complaint/ allegations.

h) The Respondent shall be granted an opportunity to record his/ her statement and produce evidence in his/ her defense.

i) The Internal Complaint Committee have the right to close the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved (complainant) or Accused (respondent) fails, without

sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Presiding Officer, as the case may be, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.

j) In case the complaint made by the complainant is found to be false at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the Rules.

k) The Internal Complaints Committee shall complete the "Enquiry" within 90 days from receipt of the complaint and submit its report with its findings to the Management within a period of ten days from the date of completion of the enquiry and such report be made available to the concerned parties.

l) In case the Complainant fails to prove her allegations made in her complaint, the matter shall stand closed.

m) In case the Respondent is found guilty of the act of sexual harassment as mentioned in the complaint, the management shall take appropriate action him in accordance with the applicable provisions of law.

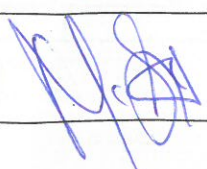
n) The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.

o) Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made and/or findings of the ICC, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

p) Each and every complaint are treated with the confidentiality of the person.

7. Action For Sexual Harassment Complaints:

Internal Complaint Committee, based on its investigation and findings arrived at the conclusion that the allegation against the respondent has been proved. It shall recommend to the employer to take any action against the respondent as per the Unitech Plasto Components ethics including:

PREPARED BY	REVIEWED BY	APPROVED BY
HR	PLANT HEAD	MANAGING DIRECTOR
		

	UNITECH PLASTO COMPONENTS PRIVATE LIMITED	Doc No	UPCL/ESG/D/01C
		Date of Doc	08/01/2024
		Rev No	00
	SEXUAL HARASSMENT POLICY	Supersede	00

- Written apology Warning letter
- Warning letter
- Withholding of promotion
- Withholding of pay rise or increments
- Termination from service
- Undergoing a counselling session etc.,

8. Action For Sexual Harassment Complaints:

Internal Complaint Committee, based on its investigation and findings arrived at the conclusion that the allegation against respondent is malicious or made the complaint knowing it to be false or has produced any forged or misleading document or witnesses, it shall recommend to the employer to take any action against the complainant as per the Unitech Plasto Components ethics.

9. Internal Complaint Committee Members:

- Ms. K. Priyadharshini – External Member
- Ms. Revathi – Internal Member
- R.Vinitha – Internal Member
- Hemachandran – Internal Member
- V.Suresh – Internal Member.

10. Annual Returns:

The Internal Complaint Committee shall prepare in such form and at such time as may be prescribed an Annual report at the end of each Calendar/financial year of the Company, giving a full account of its activities during the previous year and forward a copy thereof, to the Management or the person/committee nominated and forward the consolidated report as mandated under the Act to the concerned Authorities.

PREPARED BY	REVIEWED BY	APPROVED BY
HR	PLANT HEAD	MANAGING DIRECTOR
