

Policy on Prevention of Sexual Harassment

Objective

The objective of this policy is to protect the employee's right to work in an environment free from harassing, intimidating or offensive behavior and in which issues of harassment will be resolved without fear of reprisal.

Scope

This Policy applies to all the categories of employees of Khanna Paper Mills Ltd. including permanent employees including managerial staff and workmen. Temporaries, trainees, and employees on contract at its workplace. Khanna Paper Mills Ltd will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

Policy Guidelines

- Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitutes sexual harassment when submission to or rejection of this conduct explicitly or implicitly affects an individual. Sexual harassment includes unwelcome sexually determined behavior such as :-
 - Sexual matters, displaying sexually suggestive objects, pictures showing pornography, cartoons, gossips regarding one's sex life, Physical contact and advances or forcible physical or molestation.
 - A demand or request for sexual favours;
 - Sexually – colored remarks;
 - Showing pornography or other offensive or derogatory pictures, cartoons, pamphlets or sayings;
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- Sexual harassment can take place in any of the following forms. e.g:-
 - **Verbal:** Sexual innuendo and other suggestive comments or questions of a sexual nature, humor and jokes about sex or gender-specific traits, offensive written notes, sexual propositions and unwarranted pressure for dates, insults, threats, unwanted letters, phone calls or interviews which explicitly discuss personal.
 - **Non-verbal:** Leering, whistling, suggestive or insulting sounds and

gestures.

- **Physical:** Touching the body (brushing, patting, pinching), “friendly” arms around the shoulder, actual or attempted sexual assault, actual or attempted rape.

Guidelines

- Each Employee will maintain an appropriate standard of conduct with his/her colleagues.
- Each Employee will personally be responsible for adherence to the laid down code of conduct in his/herrange of work. The employee will ensure that (s)he does not get involved in any appropriate act, conduct, conversation, or dealings in his/her official, private, and personal spheres.
- It is the responsibility of every employee to communicate / report any unacceptable behavior of the kind mentioned in the definition to sexual harassment, initiated towards self or colleagues.
- Changes with respect to committee members in case of resignation of any member will be nominated/elected by Committee members as required to maintain adequate representation as prescribed in the Act

Complaints of Sexual Harassment

- To redress complaints of sexual harassment, an Internal Complaints Committee (ICC) will be in place. Constitution of the IC Committee will be as follows:
 - A Presiding Officer: This must be a senior female employee of the organization.
 - Two employee members: These employees must be aware and sensitive to gender issues and dedicated to the cause of women or possess some legal knowledge on related matters.
 - One external member: This should be from an NGO or Association committed to the cause of women and issues related to sexual harassment.
 - The composition should be such that half of the total members must be women.
 - For holding an enquiry, minimum of 3 members shall be required to be present.
- Aggrieved employee can file a complaint on sexual harassment to any of the members of the ICC, within a period of three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of last incident. The complaint can be filed through email or in writing.

- The Presiding officer or any other member of the ICC shall render every possible assistance to employees for making the complaint in writing.
- An employee not wishing to disclose his/her identity may also file a complaint with the management. In such a situation, the management shall retain the identity of the complainant and only provide the details of the complaint to the ICC.
- Aggrieved employee can also file a complaint with the Local Complaints Committee (LCC) or file an FIR directly at the police station, under section 509 of Indian Penal Code as a criminal offence – “Outraging the modesty of women is Physically/verbally/ gestures/exhibits”. The punishment in such cases is 1 year of imprisonment or fine or both.
- Sufficient precautions will be taken by the organization to ensure that complete confidentiality is maintained, and no form of discrimination is faced by the aggrieved employee.
- The ICC will investigate all complaints thoroughly and promptly within 15 days of receipt of complaint, in a free and fair manner. The investigation may include private interviews with the employee filing the complaint, the employee alleged to have committed the offence, and witnesses, if any.
- The employee filing the complaint will be informed of the outcome of the investigation within 30 days from the date of the complaint.
- During the pendency of an inquiry, on a written request by aggrieved employee, the ICC may recommend to:
 - Transfer the aggrieved employee or the respondent to any other workplace.
 - Grant leave to the aggrieved employee up to a period of three months.
 - Grant such other relief to the aggrieved employee as may be prescribed.
- The leave granted to the aggrieved employee under this section shall be in addition to the leave she would otherwise be entitled.
- During the course of investigation, the complainant and the defendant can be called separately to ensure freedom of expression and an atmosphere free of intimidation. Complainant may also call upon one co-employee for support before the ICC during the enquiry, if (s) he so desires.
- The ICC shall be free to adopt its own procedure for carrying out the enquiry having regard to the sensitive nature of the complaints and the respective position of the parties.
- If the investigation reveals that Sexual Harassment has been committed, the Committee will have a recommending role and cannot decide the punishment. It

will forward its recommendations to the HOD, who will decide the Disciplinary Action.

- ICC will maintain a complaint register keeping track of complaints received and the process followed.
- ICC will also make a report to the concerned Government Department on the complaints and action taken by them.
- In third party harassment, i.e. sexual harassment caused by outsiders who are not the employees of KPML, the Committee will play a role of providing moral support. If a regular complaint is received, then action can be taken by informing the police in that area.
- If at any stage, after the filing of a complaint and during the proceedings in respect of it under these rules by the ICC, the aggrieved employee wishes to withdraw the complaints then she/he shall have the right to withdraw the complaint and the redressal committee shall permit him/her to withdraw the complaints and if an enquiry has commenced, then the ICC shall discontinue the enquiry.
- In case, the complainant wishes to settle the matter at his/her terms with the defendant and the latter agrees for the same, then the redressal committee will submit the report accordingly.

Disciplinary Action

- If the investigation reveals that Sexual Harassment has been committed by any of KPML employees, prompt and appropriate Disciplinary Action will be taken, as decided by the Presiding Officer of the ICC. Such action(s)- Combination of written warning, reprimand or censure, public/written apology, transfer, demotion, monetary fine, withholding increments/ promotions, suspension, termination.
- If it is brought to the notice of the ICC or if the Committee is of the opinion that pressure is being brought on the complainant or the witnesses to withdraw their statements or not to proceed with the complaints the committee will record the same and will attract disciplinary action.
- If the ICC observes false accusations of sexual harassment, and subsequent inquiry establishes such false accusation – including malicious intent, false statements, and forged/misrepresented records – it may recommend disciplinary action against the complainant in a prescribed manner.
- Mere inability to substantiate or provide proof will not attract action against the complainant.

For any clarification, please contact:

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