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|---|--|---|----------------|--|---|
|  |  | <b>APL Apollo Tubes Ltd</b>                         |                | <b>Policy No- HR-APL-13</b>                          |   |
| Prepared : Name / Sign / Date<br>JPS / /1st July 2016                             |  | Approved : Name /Sign / Date<br>AG / /1st July 2016 |                | Released : Name / Sign / Date<br>JPS/ /1st July 2016 |   |
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## **Subject: Prevention of Sexual Harassment**

### **1. Purpose:**


This policy is framed with the objective to prevent or deter acts of sexual harassment of women and to provide for direction, process, procedure and forums for submission, hearing and resolution of the complaints with respect to any alleged acts of sexual harassment.

### **2. Scope**


This policy is applicable to all employees of APL Apollo Tubes Ltd. and its subsidiaries.

### **3. Procedure:**

- a) **Accused:** Accused means any person who is alleged to have committed an act of sexual harassment and against whom a complaint has been filed under this policy.
- b) **Complainant:** Means the affected person or any person/witness who as per the desire of the affected person makes a complaint under this policy. Where a sexual harassment occurs by an act of any third party or outsider, the Company will take possible actions to support to redress the same.
- c) **Complaints Committee (CC):** CC is formed by the Management of the Company and all the complaints of sexual harassment will be submitted to CC. The composition and role of CC is explained in Annexure – I
- d) **Sexual Harassment:** “Sexual Harassment” includes unwelcome sexually determined behaviour (whether directly or by implication) such as:
  - i. Physical contact and advances;
  - ii. A demand or request for sexual favours;
  - iii. Sexually coloured remarks;
  - iv. Showing pornography;
  - v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- e) As such, any behaviour which is unwelcome or unwarranted and outrages the modesty of an employee ought to be considered as an act of sexual harassment. Sexual Harassment can be divided into two categories:
- f) **Quid Pro Quo form of harassment:** A quid pro quo form of harassment means, where certain favours are expected from an employee in order to either give employment, promotion or recommendation thereof.
- g) **Hostile form of harassment:** A hostile form of harassment means where an employee has to work under hostile, offensive or humiliating environment created by other employee/(s).

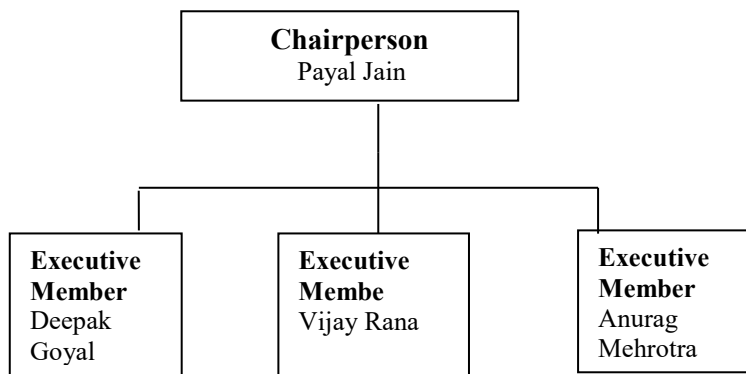
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- h) A complaint of sexual harassment should be made by the complainant to a member of the CC with a request for initiation of action. The complaint has to be submitted in writing under signature of the complainant and it is the duty of the member to whom the complaint is filed to immediately inform the Chairperson and other members of CC and schedule a meeting. The CC will carry out an enquiry by appointing one or more of the members as Enquiry officer/s.
- i) The enquiry should be completed and the report should be submitted within 21 days of the date of appointment by The CC.
- j) The CC based on this report /recommendations shall hear both the parties and adjudicate thereupon after having the consent of majority of the members of the CC to the decision. The decision of the CC can be appealed to Managing Director within seven days of the decision of CC. The Managing Director will follow the same timelines/procedure as applicable to CC and adjudicate on the matter. The decision of the Managing Director shall be final. Head-HR shall implement the decision of the CC/Managing Director. The entire procedure will be based on the principles of natural justice and fair play. Complaints Committee and Enquiry Officer/s shall deal with all complaints expeditiously and seek to adhere to the time frame detailed in Annexure II.
- k) CC shall maintain a complete record of its proceedings in a separate file and store it safely.
- l) When a complaint is made, the CC shall assure complete confidentiality of the incident and of the information.
- m) The Affected Person, Complainant or any person providing information or any witness will be protected from any form of retaliation.
- n) If based on enquiry it has been revealed that the complaint has been made with a malicious intent and with the motive of maligning the concerned individual or tarnishing his/her image or to settle personal scores, strict disciplinary action will be taken against the complainant.
- o) The disciplinary action taken by the company shall be disseminated to the employees without disclosing the name of the complainant and affected person. A report will also be placed before the the Management every quarter on the status with respect to this policy.

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### Annexure - I

### Complaints Committee (CC)




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|---|---|--|----------------|
|  <b>APL Apollo Tubes Ltd</b> |   | <b>Policy No- HR-APL-13</b>                          |                |
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## Annexure - II

### REDRESSAL PROCEDURE

| SI No | Stage   | Responsibility         | Time Period (In days)                        |
|-------|---|------------------------|--|
| 1     | Receipt of written complaint with a request for initiation of action  | Complainant            | X  |
| 2     | Meeting of Complaints Committee (CC)  | Concerned member of CC | X+7  |
| 3     | Copy of the written complaint to be forwarded to the accused along with direction to file a reply, if any, within 7 days of receipt of copy of the complaint                        | CC                     | X+7  |
| 4     | Filing of reply by accused with CC  | Accused                | Within 7 days (X+14)                         |
| 5     | Meeting of CC to dispose of the complaint by directions to intimate both the<br><br>or Appointment of an enquiry officer/s with the direction to file their findings within 21 days | Chairperson            | Within 5 days (X+19)<br>Within 5 days (X+19) |
| 6     | Submission of enquiry report  | Enquiry Officer/s      | Within 21 days (X+40)                        |
| 7     | Hearing both the parties and adjudicate Thereupon by CC.  | Chairperson            | Within 5 days (X+45)                         |
| 8     | Forwarding of the findings to the Management  | Chairperson            | Within 2 days (X+47)                         |
| 9     | Appropriate disciplinary action by the Management   | MD                     | Within 7 days (X+54)                         |

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**Policy Revision Status :**

| Revision |      | Description<br>of Revision | Prepared |      | Approved |      | Released |      |
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| Status   | Date |                            | By       | Date | By       | Date | By       | Date |
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