



POLICY FOR PREVENTION OF SEXUAL HARRASMENT OF WOMEN AT WORKPLACE

(Effective from 14th November, 2022)

Considered and Approved by the Board of Directors on 14-11-2022.

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I. OBJECTIVE

DPIL strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. DPIL will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, DPIL will seek to prevent, correct and discipline behaviour that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

The Company had framed its Policy on Prevention of Sexual Harassment of Women at Workplace and approved by its Board of Directors at its meeting held on 14th November, 2022 and had constituted an internal committee for the inquiry and redressal of complaints for matters relating to sexual harassment. The Company has now updated its policy, in line with changes in law and industry practices, for providing greater protection to employees from sexual harassment at Workplace and has launched this Policy on Prevention of Sexual Harassment of Women at Workplace, 2020.



II. SCOPE

This policy cover complaints by all women employees of the organization irrespective of designation at the workplace as defined in the act of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder (collectively called “POSH Act”).

III. IMPORTANT DEFINITIONS

- 1) Sexual Harassment: “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior, whether directly or by implication, but not limited to:
 - a) Any unwelcome sexually determined behaviour or pattern of conduct, that would cause discomfort and/ or humiliate a person at whom the behaviour or conduct was directed namely:
 - i) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, whether implicit or explicit;
 - ii) Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation;
 - iii) Teasing, voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement;
 - iv) Demand or request for sexual favours;
 - v) Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body;
 - vi) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas;
 - vii) Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.;
 - viii) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest;



- ix) Giving gifts or leaving objects that are sexually suggestive;
 - x) Eve teasing, physical confinement against one's will or any such act likely;
 - xi) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- b) An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the Aggrieved Woman.
- 2) Aggrieved Woman: "Aggrieved Woman" means, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent in the Workplace and includes contractual staffs, temporary staffs, or visitors.
- 3) Complainant: "Complainant" means an Aggrieved Woman or any person as mentioned in Section 8.1 below.
- 4) Employee: "Employee" means a person employed at a Workplace for any work on regular, temporary, adhoc or daily wage basis, either directly or by 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 domestic worker, a co-worker, a contract worker, probationer, trainee, apprentice or by any other name called;
- 5) Employer: "Employer" means a person who is responsible for management, supervision and control of the Workplace, for the purpose of this Policy.
- 6) Workplace: "Workplace" means:
- a) Company office premises, Company-related activities performed at any other site away from the Company's premises, Company business party or get-to-gather or celebration, Company transit house or guest house or official hotel stay or any other such place, Company vehicle including official tour by air, land, rail or sea, visited by the Employee arising out of, or during and in the course of employment.



- b) Any social, business or other functions where the conduct or comments may have an adverse impact on the Workplace relations.
 - c) Any place visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.
- 7) Respondent: “Respondent” means a person against whom a complaint of Sexual Harassment has been made by the Complainant.

IV. INTERNAL COMMITTEE

An Internal Committee (“IC”) has been constituted by the Company under the POSH Act to conduct an inquiry and for redressal of a complaint of Sexual Harassment, having the members as listed in Schedule A.

V. LODGING AND REGISTRATION OF THE COMPLAINT

- 1) A complaint for Sexual Harassment may be made by any Aggrieved Woman who believes she is being sexually harassed or by any person who has knowledge of the incident, with her written consent or her legal heirs, relatives, friends or by any person who has acknowledge of the incident.
- 2) Any of the above, may submit a detailed complaint of the alleged incident of Sexual Harassment in writing or via mail, along with supporting documents, and the names and addresses of the witnesses, to any member of the IC in writing with the Aggrieved Woman’s signature, within 3 months of occurrence of the incident of Sexual Harassment.

VI. RESOLUTION

The IC will conduct an detailed inquiry into the complaint lodged in para V(2) and take the following actions:

- i) The IC within 7 (seven) working days of receiving the complaint, shall forward one copy thereof to the Respondent for obtaining a response.



- ii) The Respondent within 10 (ten) working days of receiving the complaint, shall file his reply to the complaint along with list of supporting documents, names and addresses of witnesses.
- iii) The IC shall consider the reply from the Respondent and initiate an inquiry. IC shall hear both the Complainant and the Respondent on date(s) intimated to them in advance and the principles of natural justice will be followed by the IC.
- iv) In the event of failure to attend personal hearing before IC, either by the Complainant or the Respondent, on three consecutive dates (intimated in advance), the IC shall terminate the inquiry proceedings or give an ex parte decision, as applicable.

VII. INTERIM RELIEF

On the written or email request by the complaint, the IC may recommend to the Employer to:

- 1) Transfer the Aggrieved Woman or the Respondent to any other Workplace; or
- 2) Grant leave to the Aggrieved Woman of maximum 3 months, in addition to the leave she would be otherwise entitled; or
- 3) Any other recommendation by the IC as appropriate.

VIII. Confidentiality

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the IC will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department as authorized by IC.

IX. APPEAL

Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the POSH Act.



X. DISCIPLINARY PROCEEDING

Pursuant to written recommendation of the Employer based on the report and findings of IC and subject to the final outcome of the appeal proceedings (as per clause IX, above), if any, necessary disciplinary proceedings may be initiated against the Respondent.

XI. AMENDMENT TO THE POLICY

The Company may revise the Policy as may be advised from time to time. Any change in the Policy shall be notified to all concerned.

SCHEDULE A – INTERNAL COMMITTEE MEMBERS

1st Members or chairperson – Senior female employee from team;

2nd and 3rd Members – any employee of the Organization or person having legal knowledge.

4th Member – from Non - Government organization committed to the cause of women or person familiar with the issue relating to sexual harassment.