Policy of the Company under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

1. Objective

Kanknarrah Company Limited is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

2. Definition of sexual harassment

a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.

b) 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.

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

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

e) 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 in (a) above, may amount to sexual harassment:—

(i) Implied or explicit promise of preferential treatment at work; or

(ii) Implied or explicit threat of detrimental treatment at work; or

(iii) Implied or explicit threat about present or future employment status; or

(iv) Interference with work or creation of an intimidating or offensive work environment; or

(v) Humiliating treatment likely to affect health, safety or self-esteem.

3. Policy statement

a) All Kanknarrah employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.

b) All Kanknarrah employees will understand and appreciate the rights of the individual to be treated with dignity.

c) All Kanknarrah employees are required to maintain a work environment, which is free from any kind of harassment.

d) Kanknarrah employees will refrain from committing any acts of sexual harassment at work place.

e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.

f) Kanknarrah employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

4. Procedure for dealing with complaints of sexual harassment

a) If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Internal Complaints Committee (ICC) through the respective Department Head.

b) Ideally, the complaint should be lodged immediately or within a reasonable period 3 months from the date of incident/last incident.

c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.

d) An "Internal Complaint Committee" has been set up to deal with the complaint. A female Kanknarrah Company employee will head the committee and not less than half of its members will be women, further to prevent any undue influence, the committee will also consist of a third party, either an NGO or any other body familiar with the issue of sexual harassment.

e) The complaint committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.

f) Any victimization of, or retaliation against, the complainant or any Kanknarrah Company employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.

g) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.

5. Disciplinary Action

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

Sexual harassment will not be tolerated at Kanknarrah Company. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behavior has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

6. Internal Complaint Committee (ICC)

The committee will be chaired by a senior female Employee. In addition, the members would include one senior female employee, and an external person of repute. The members of the committee will be rotated every 3 year

7. Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by Kanknarrah Company shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee. No case of sexual harassment was report during the financial year 2018-19.

8. Members of Internal Complaint Committee (ICC)

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

9. Applicability

The Policy shall become operational from the date as may be decided by the Board of Directors of the Company.