

Deco-Mica Limited

SEXUAL HARASSMENT POLICY

THE POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT OF WOMAN AT WORKPLACE (THE ANTI HARASSMENT POLICY)

DECO MICA LIMITED (“THE COMPANY”) is committed to providing a working environment free from discrimination, and to prohibit harassment of its employee and applicants, including sexual harassment. The Company will implement the policy to fully comply with applicable federal, state and local laws, rules and regulations in the area of non-discrimination and harassment of employment.

Definitions:

- I. **“Sexual harassment” means** any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:
 - a) Physical contact and advances; or
 - b) A demand or request for sexual favours; or
 - c) Making Sexually coloured remarks; or
 - d) Showing Pornography; or
 - e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

- II. **“Act” means** The Sexual Harassment of Women at workplace (prevention, Prohibition and Redressal) Act, 2013.

- III. **“Internal Committee” means** Internal Complaint Committee constituted as per the Act.

Conduct of constitutes harassment when:

- Submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual’s employment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions and/or retaliation; or
- Such conduct has the purpose or effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment.

Coverage Policy:

The policy covers Harassment due to race, religion sex, sexual harassment, national origin, disability, age, military or veteran status. Such conduct is subject to discipline, up to and including termination.

Making a complaint:

Any volunteer or employee who believes he or she is a victim of sexual harassment must immediately report any incident to the Company's Internal Committee constituted as per the act.

The Company will not tolerate retaliation against any employee who complains of sexual harassment or provides information in connection with any such complaint.

Complaining Process:

When a complaint is received, the Internal Committee will:

- Obtain and record a full, step-by step account of the incident/s
- Ensure the organisation's process for handling the complaint is understood
- ascertain the complainant's preferred outcome, e.g. an apology, the behaviour to cease, a change in working arrangements
- agree on the next step : informal resolution or formal investigation
- Keep a confidential record of all details of this discussion and subsequent steps in the process.

Informal Resolution:

Where a complainant has chosen informal resolution, following an informal process the Internal Committee will:

- inform the alleged harasser of the complaint and provides an opportunity to respond
- ensure both parties understand their rights and responsibilities under the Organisation's Policy
- if possible, mediate an outcome that is satisfactory for the complainant
- ensure that confidentiality is maintained
- Follow up to ensure the behaviour does not re-occur.

Formal Investigation:

If a formal investigation is requested by the complainant, or if an informal resolution fails,

The Internal Complaint Committee will:

- Afford natural justice to all involved
- Interview all directly concerned , separately
- Interview witnesses, separately
- Keep records of the interviews and Investigation
- Ensure confidentiality and minimize disclosure
- Make a determination as to whether there is a sufficient evidence that a reasonable person could conclude, on the balance of probabilities (i.e. it's more likely than not) , that an incident/incidents of sexual harassment as defined by the legislation has occurred.
- In such a case, determine appropriate action , which may include a change of duties for the harasser , change to working arrangements or, where the incidents were frequent and/or severe, dismissal.
- Where it cannot be determined by the required test, that an incident/incidents of sexual harassment as defined by the legislation has occurred, may still take action to ensure the proper functioning of the workplace; but these actions should not prejudice any party. They will also continue to closely monitor the situation and provide retraining where required.
- Check to ensure the action meets the needs of the complainant and organisation.

Reporting:

The Company shall disclose the status of complaints regarding sexual Harassment along with the redressals of the complaints made by the Internal Complaint Committee in its Annual Report every year.