

**POLICY ON PREVENTION OF SEXUAL
HARASSMENT AT WORKPLACE**
OF
MALU PAPER MILLS LIMITED

I. COMMITMENT:

MALU PAPER MILLS LIMITED (“MPML” OR “Company”) is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE

“This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes:

- a. All offices, plants or other premises where the Company’s business is conducted.
- b. All company-related activities performed at any other site away from the Company’s premises.
- c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION:

- a. “Aggrieved Person” means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- b. “Company” means Malu Paper Mills Limited.
- c. “employee” means a person employed at a workplace for any work on regular, temporary, *ad hoc* or daily wages basis, either directly 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- d. “Internal Complaints Committee” means a committee constituted by Company as per this Policy.
- e. “Respondent” means a person against whom the aggrieved person has made a complaint.

- f. "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favors; or
 - iii. Making Sexually colored remarks; or
 - iv. Showing pornography; or
 - v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or
- g. "workplace" includes any department, organization, undertaking, establishment, enterprise institution, office or plant unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

IV. INTERNAL COMPLAINTS COMMITTEE:

Every complaint received shall be forwarded to Internal Complaint Committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose.

Internal Complaints Committee has been constituted of the following members as nominated by the Company

- a. A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- b. Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- c. One member shall be from amongst Non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

The Name of the Members of the Internal Complaints Committee is as per **Annexure A** of this Policy and any change in such composition shall be effected in the policy

Atleast half the total members of the Committee have to be women. The Presiding Officer and every member of Internal Complaints Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

V. COMPLAINT REDRESSAL MECHANISM

Any aggrieved person may make, in writing, a complaint of sexual harassment at

workplace to the committee giving details of the sexual harassment meted out to her/him within a period of 3 months from the date of incident and in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the Internal Complaints Committee, for reasons to be recorded in writing.

The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.

Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

On receipt of complaint, the Internal Complaint Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent. The Internal Complaints Committee shall follow principles of Natural Justice while handling such complaints.

The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee through following mode:

- a. Copy of complaint along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee at info@malupaper.com
- b. On receipt of such complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the Respondent within 7 working days
- c. Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses
- d. Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
- e. During the enquiry process, the Complainant and the respondent shall refrain from any form of threat, intimidation or influencing of witnesses.
- f. The Committee will conduct enquiry in accordance with the principles of natural justice and will ensure to give both parties, the aggrieved as well as

the respondent, a right to be heard and present their case before the Committee.

- g. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- h. For conducting the enquiry the quorum of the Internal Complaints Committee shall be of 3 members including the Presiding Officer.

VI. CONCILIATION

The Internal Committee may before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, Internal Complaints Committee shall ensure that:

- Monetary settlement will not be made as a basis of conciliation.
- Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.

The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:

- summoning and enforcing the attendance of any person and examining him under oath;
- requiring discovery and production of documents;
- any other prescribed matter.

VII. ACTION THAT MAY BE TAKEN BY THE COMMITTEE DURING PENDENCY OF THE INQUIRY

During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:

- a. to transfer the aggrieved person or the respondent to any other workplace;
- b. grant leave to the aggrieved person of up to three months which is in addition to leave to which she is otherwise entitled.
- c. grant such other relief to the aggrieved woman as may be prescribed.

Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the workplace.

VIII. ACTION:

The Committee shall submit a written report containing the findings and recommendations on action to be taken to the “Whistle Officer” appointed by the Company as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Whistle Officer and the Chairman of the Company will jointly take decision on the corrective action based on the recommendations of the Complaints Committee and keep the concerned parties informed of the same.

If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.

If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, or if such complaint is proved to be false or malicious, it shall recommend to take following actions depending upon the circumstances:-

- Formal apology
- Counseling
- Written warning to the Respondent and a copy of it maintained in the employee’s file.
- Change of work assignment / transfer for either the Respondent or the Complainant.
- Suspension or termination of services of the employee found guilty of the offence
- Granting of compensation or damages to the Complainant.

The employer (Company) shall act upon the recommendation within sixty days of receiving it.

IX. FALSE ACCUSATIONS:

The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.

If the Internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended.

It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints.

X. MISCELLANEOUS:

Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:

1. Number of complaints of sexual harassment received during the year;
2. Number of complaints disposed off during the year;
3. Number of cases pending for more than 90 days;
4. Number of workshops or awareness program against sexual harassment carried out;
5. Nature of action taken by the employer.

XI. AMENDMENT:

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.

XII. CONCLUSION :

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. All records of complaints will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

PUNAMCHAND MALU

MANAGING DIRECTOR & CEO

ANNEXURE – A

**Composition of Internal Complaints
Committee**

Sl no.	Designation	Membership
1	Ms. Mayuri Asawa	Presiding Officer
2.	Brijgopal Soni	Member
3.	Mr. Jeetendra Panpaliya	Member
4.	Mrs. Rupa Bajaj	External Member

Policy amended on: 30/10/2021
Further amended on: 11/02/2023