

**NARAYANI STEELS LIMITED**  
**CIN: U27109WB1996PLC082021**

**SEXUAL HARASSMENT POLICY**

**Registered Office: 23A, N.S. Road, 7th Floor, Room-31,**  
**Kolkata-700 001, West Bengal, India.**

**Tel. No: 0891-2501182**

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## **POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE**

The Narayani Steels Limited (“NSL”), is an equal employment opportunity Company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that NSL strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being the Sexual Harassment of Women at Workplace (hereinafter referred to as “Act”) as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

### **DEFINITIONS:**

**“Company”** means Narayani Steels Limited.

**“Employee”** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage 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.

**“Aggrieved woman”** means

- i. In relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;
- ii. In relation to dwelling place or house, a woman of any age who is employed in such dwelling place or house.

**“Respondent”** means a person against whom the aggrieved woman has made complaints.

**“Sexual Harassment”** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- a. Physical contact and advances; or
- b. A demand or request for sexual favors; or
- c. Making sexually colored remarks; or
- d. Showing pornography; or
- e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

- a. Implied or explicit promise of preferential treatment in their employment;
- b. Implied or explicit threat of detrimental treatment in their employment;
- c. Implied or explicit threat about their present or future employment status;
- d. Interfering with their work or creating an intimidating or offensive or hostile work environment;
- e. Humiliation treatment likely to affect their health or safety.
- f. Humiliating treatment likely to affect the health and safety of the aggrieved person.

**“Domestic Worker”** means women who are employed to do the household work in any household for remuneration whether in cash or kind, either directly or through agency on a temporary, permanent, part time or full time basis, but does not include any member of the family of the employer.

**EFFECTIVE DATE:**

The Policy shall extend to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

**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 woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.

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. 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.

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

**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.

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, relatives or friends may make a complaint. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee through following mode:

Copy of complaint along with supporting documents and names and address of witness shall be sent to the below address of the Internal Complaints Committee, Narayani Steels Limited, 23A, N. S. Road 7th Floor, Room-31 Kolkata 700001 , West Bengal, India.

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. Respondent shall file reply within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.

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. Internal Complaint Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause. The Internal Committee must complete its investigation within a period 60 days. 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. For conducting the enquiry the quorum of the Internal Complaints Committee shall be of 3 members including the presiding officer. 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:

- a. Monetary settlement will not be made as a basis of conciliation.
- b. 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.
- c. 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:

- a. Summoning and enforcing the attendance of any person and examining him under oath;
- b. Requiring discovery and production of documents;
- c. Any other prescribed matter.

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

**ACTION:**

The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.

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, it shall recommend to:

a. Take action for sexual harassment as misconduct.

b. To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.

c. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine. Such action will be taken within 60 days of the receipt of report.

**MISCELLANEOUS**

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.

The Internal Complaint Committee shall prepare an annual report about status of the Complaints and shall submit the same to the Company to include in its Annual report.

**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.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

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Annexure – A

S. No	Name of the Person	Designation in Company	Designation in Committee
1.	Smt. Bina Choudhary	Director	Presiding Officer
2.	Ms. Nisha Rathor	Company Secretary	Member
3.	Mrs. R. Rajani	Administrative Executive (In Administration Department)	Member