

CORDS CABLE INDUSTRIES LIMITED

POLICY FOR PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

(Lastly approved by the Board of Directors in their meeting held on May 26, 2022)

For Cords
A. S. L. D.
Director

1. TITLE AND COMMENCEMENT

This Policy will be called Cords Cable Industries Limited (CORDS) - Policy for prevention, prohibition and redressal of sexual harassment at workplace as per the provisions of Sexual Harassment of Women at Workplace (SHWW) (Prevention, Prohibition and Redressal) Act, 2013 and the Rules (hereinafter referred to as 'Policy') and is applicable to all employees of Cords, deployed at the workplace who are either-

- a. On the rolls of the establishment; or
- b. Engaged through the Contractor(s) having service agreement with the establishment or as enumerated in clause (f) of Section 2 of the SHWW Act.

2. RESPONSIBILITY OF EMPLOYEES

All employees of the Company have a personal responsibility to respect every other employee's dignity and ensure that their behaviour is not contrary to this policy. All employees are encouraged to maintain a work environment free from sexual harassment.

3. SCOPE

This Policy shall apply to all persons employed at the workplace for any work of regular, temporary, ad-hoc or daily wage basis, directly or through an agent / contractor, including but not limited to persons working on a voluntary basis and also apprentices, trainees, probationers, agent, including consultants of the Company. The Company will not tolerate sexual harassment if engaged in by clients, suppliers or by any other business associates.

The Workplace (by whatever named called, where there are 10 or more employees) includes:

- a) All offices 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 work placed relations.

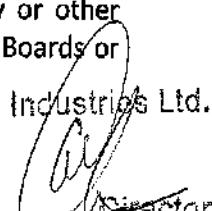
4. OBJECTIVE

The Company firmly believes that every employee has a right to work in an environment free from harassment, intimidation or offensive behaviour and issues of harassment will be resolved without fear of reprisal. The Policy is designed to take effective measure to prevent, prohibit, sexual harassment and have the mechanism to redress cases of sexual harassment and impose punishment for those responsible for sexual harassment.

5. POLICY

Harassment in any form will not be permitted or tolerated or condoned by the Company whether it is based on a person's race, color, ethnic or national origin, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability or other personal characteristics. The use of Company's property including e-mail, Notice Boards or any document as a vehicle for harassment is prohibited.

For Cords Cable Industries Ltd.


Director

6. PROHIBITION OF SEXUAL HARASSMENT

To comply with the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and in pursuance thereof the terms and conditions of this policy, no employee shall engage in Sexual Harassment.

7. MEANING OF SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR:

'Sexual Harassment', includes any unwelcome sexually determined behaviour, direct or by implication, and includes physical contact and advances, a demand or request for sexual favours, sexually coloured remarks, showing pornography, any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Sexually Oriented behaviour shall mean and include but not limited to the following:

- Material that is sexual in nature, sexist, sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer, i-pad, mobile phone, i-phone or on any other machine or on the internet or any other public display system or public place in the work premises.
- Verbal abuse or comments that put down people because of their sex.
- Comments about people's (women/men) bodies.
- Tales of sexual exploits
- Graphic descriptions pornography
- Pressure for dates
- Sexually explicit gestures
- Unwelcome touching and hugging
- Sexist and insulting remarks
- Sexist jokes and cartoons
- Displaying pornography in the workplace
- Insisting that workers wear revealing clothing
- Inappropriate gifts
- Discussion of one's partner's sexual life
- Lewd and threatening letters
- "Accidentally" brushing sexual parts of the body
- Indecent exposure
- Subtle or overt pressure for sexual favours
- Soliciting sexual services
- Demanding sexual services
- Sexual or physical contact
- Intrusive questions about sexual activity

- Sexual assault
- Repeated sexual invitations when the person invited has refused/ignored similar invitations

“Sexual Harassment” should not be confused with simple friendly behaviour, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is an unwelcome act. Any other term not defined herein shall have the same meaning as defined in the Act or any other applicable law.

8. PREVENTION OF SEXUAL HARASSMENT

No person shall be subjected to sexual harassment at any work place. 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 may amount to sexual harassment:

- (i) Implied or explicit promise of preferential treatment in the persons employment/promotion; or
- (ii) Implied or explicit threat of detrimental treatment in the persons employment/promotion; or
- (iii) Implied or explicit threat about the persons present or future employment/promotion status; or
- (iv) Interferes with work or creating an intimidating or offensive or hostile work environment for the persons; or
- (v) Humiliating treatment likely to affect the persons health or safety.

9. THE INTERNAL COMPLAINTS COMMITTEE

- a) A Committee has been constituted by the Management called the Internal Complaints Committee (ICC) to consider and redress complaints of Harassment at every office/administrative units/workplace/factory location of the Company. The Presiding Officer and Members of the Committee are as follows:

Sr. No.	Category	Name of the designated member
1	Presiding Officer	Senior level woman employee of the Company
2	Member	Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge
3	Member from an NGO/ Lawyer (Member) / any external body	One external member from Non-Government Organization or Association committed to the cause or a person familiar with the issues relating to sexual harassment

The ICC shall be constituted / reconstituted from time to time in compliance with the Act and the rules framed thereunder.

- b) A quorum of three members is required to be present for the proceedings to take place. The quorum should include the Chairperson, at least two members, one of whom shall be a lady.
- c) The Presiding officer and every member of the committee shall hold office not exceeding 3 years from the date of their nomination. On the expiry of the three year period, the existing members of the Internal Complaints Committee (ICC) will continue to hold office, till the new Internal Complaints Committee is constituted. If a member of the Internal Complaints Committee who is an employee of the company and when she / he cease to be an employee of the company then she/he will also cease to be a member of the Internal Complaints Committee.
The Internal Complaints Committee will cover all the factories and offices of the company in India.
- d) The external member (appointed from amongst non - governmental organization or associations or a person familiar with the issues relating to sexual harassment) shall be paid such fees or allowances for holding the proceedings of the internal committee as may be prescribed.
- e) Where the presiding officer or any member of the Committee:
 - i Contravenes the provisions of section 16 of the act. (disclosure identity of aggrieved women, respondent and witnesses); or
 - ii Has been convicted of an offence or an enquiry into an offence under any law for the time being in force is pending against him / her; or
 - iii He / she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
 - iv Has so abused his/ her position as to render his/her continuance in office prejudicial to the public interest.Such presiding officer or member as the case may be shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination in accordance with the provision of section 4 of the Act.
- f) The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.
- g) The Complaints Committee is responsible for -
 - i. Investigating every formal written complaint of sexual harassment
 - ii. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
 - iii. Discouraging and preventing employment-related sexual harassment

12. COMPLAINTS PROCEDURE

A. INFORMAL RESOLUTION OPTION

- When an incident of sexual harassment occurs, the victim of such conduct can communicate her/his disapproval and objections immediately to the harasser and request the harasser to behave decently.

- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, she/he can bring her/his concern to the attention of a member of the Complaints Committee for redressal of her/his grievances,

B. COMPLAINTS MECHANISM

- A Complainant may file a complaint, in writing, at ccil@cordscable.com or deliver by hand six copies of the complaint to any member of the ICC, if he or she believes to be subjected to sexual harassment.
- Such a complaint needs to be in writing within a period of three months from the date of incident, mentioning the name, department, division and location of the complainant, along with other supporting documents and names, addresses of the witnesses, to enable the Internal Complaints Committee to contact her/him and resolve the matter.
- The time limit for making the complaint may be extended up to a further period of three months, if the Internal Complaints Committee is satisfied that the circumstances were such which prevented the complainant from filing the complaint within that period.
- If the Complainant is unable to make a complaint on account of physical incapacity, a complaint may be filed by –
 - (i) his or her legal heir; or
 - (ii) his or her relative or friend; or
 - (iii) his or her co-worker; or
 - (iv) an officer of the National Commission for Women or State Women's Commission; or
 - (v) any person who has knowledge of the incident, with the written consent of the aggrieved
- If the Complainant is unable to make a complaint on account of mental incapacity, a complaint may be filed by –
 - (i) his or her legal heir; or
 - (ii) his or her relative or friend; or
 - (iii) a special educator; or
 - (iv) a qualified psychiatrist or psychologist; or
 - (v) the guardian or authority under whose care he or she is receiving treatment or care;
 - (vi) any person who has knowledge of the incident jointly with his or her relative or friend or a special educator or qualified psychiatrist or psychologist or guardian or authority under whose care he or she is receiving treatment or care.

If the Complainant, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with

- his or her written consent. If the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his or her legal heir.
- On receipt of the complaint, the ICC shall share a copy of the Complaint with the Respondent within 7 working days.
- The Respondent shall file his or her reply, along with the list of documents and names and addresses of witnesses, within 10 working days from the date of receipt of documents.

C. COMPLAINTS PROCEDURE

- Both the Complainant and Respondent shall be given an opportunity to the Complainant and to the accused, for putting forward and defending their respective case and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC. The ICC shall conduct the inquiry in accordance with the principles of natural justice.
- In conducting the inquiry, minimum 3 members of the ICC including the Presiding Officer shall be present.
- 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 ICC.
- The ICC shall have the right to terminate the inquiry proceedings or give an ex parte decision, if the Complainant or Respondent fails, without sufficient cause, to present themselves for 3 consecutive hearings convened by the Presiding Officer.
- However, such termination or ex parte order may not be passed without giving a notice, in writing, 15 days in advance to the party concerned.
- During the pendency of an inquiry and on a written request by the Complainant, the ICC may provide such relief as it may deem appropriate and in line with other applicable statutory laws.
- The inquiry shall be completed within a period of 90 days. On completion of an inquiry, the ICC shall provide a report of its findings to the Employer/Company within a period of 10 days from the date of the completion of the inquiry and such report be made available to the concerned parties
- Where the ICC arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer/Company that no action is required to be taken in the matter.
- Where the ICC arrives at a conclusion that the allegation against the Respondent has been proved, the Company will ensure to take corrective action on the recommendations of the ICC and keep the complainant informed of the same. Corrective action may include any of the following:
 - Written warning to the perpetrator and a copy of it maintained in the employee's file.

- b) To deduct notwithstanding anything in the service Rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved or to the legal heirs as may be determined.
- c) Such allegations of sexual harassment when proved, shall affect the annual review of the harasser
- d) Change of work assignment / transfer for either the perpetrator or the victim.
- e) Suspension or termination of services of the employee found guilty of the offence.

■ The Employer/Company shall act upon the recommendation within 60 days of the receipt of the recommendation.

13. CONCILIATION

Before initiating an inquiry and at the request of the Complainant, the ICC may take steps to settle the matter through conciliation. However, no monetary settlement shall be made as a basis of conciliation. Where a settlement is arrived at, the ICC shall record it and take the action as per the settlement and no further inquiry shall be conducted. Further, the copies of such settlement shall be provided to the Complainant and Respondent. If the Complainant informs the Location ICC that any term or condition of the settlement has not been complied with by the Respondent, the ICC shall proceed to conduct an inquiry or forward the same to the police.

14. FALSE OR MALICIOUS COMPLAINTS

If the Location IC arrives at a conclusion that:

- (i) the allegation against the respondent is malicious; or
- (ii) the Complainant has made the complaint knowing it to be false; or
- (iii) the Complainant has produced any forged or misleading document;

it may take appropriate action against the Complainant.

However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant. A malicious intent on part of the Complainant shall be established after an inquiry and before any action is recommended. Where the Location IC arrives at a conclusion that during the inquiry, any witness has given false evidence or produced any forged or misleading document, it may also take appropriate action against the witness as may be prescribed under the Act.

15. ASSURANCE AGAINST RETALIATION

This policy seeks to encourage all employees to express freely, responsibly, and in an orderly way opinions and feelings about any problem or complaint of sexual harassment. Retaliation against persons who report or provide information about sexual harassment or behaviour that might constitute sexual harassment is also strictly prohibited. Any act of reprisal, including internal interference, coercion, and restraint, by an employee, violates this policy and will result in-appropriate. In the event complainant being an employee and the respondent being his/her Manager, the Internal Complaints Committee or a member

thereof may during the pendency of investigation and even after such investigation if the Manager is found to be guilty, recommend to the management to:

- a) Change the manager of the aggrieved or;
- b) Transfer the aggrieved or the respondent to any other workplace or;
- c) Grant leave to the aggrieved up to a period of three months or;
- d) Grant such other relief to the aggrieved as may be prescribed.

16. OBLIGATIONS OF THE MANAGEMENT

The Company shall provide all necessary assistance for the purpose of ensuring full effective and speedy implementation of this Internal Complaints Committee constituted as above and shall implement the decisions in an expeditious manner.

17. CONFIDENTIALITY

- a) The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained by the members of the Complaints Committee, parties to the case and all other persons who come in connection with the proceedings of the case, throughout any investigatory process to the extent practicable and appropriate under the circumstances.
- b) Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint made, the identity of the aggrieved, respondent and witnesses, any information relating to inquiry and proceedings, recommendations of the Internal Complaints Committee and the action taken by the Company shall not be published, communicated or made known to the public, press and media in any manner.
- c) Where any person entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or actions to be taken under the policy contravenes the provisions of clause b) above, he/she shall be liable to penalty as may be prescribed by the Internal Complaints Committee.

18. THIRD PARTY HARASSMENT

In case of third party Sexual Harassment the Internal Complaints Committee will actively assist and provide all its resources to the complainant in pursuing the complaint.

19. SAVINGS

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the respondent under any other provision of civil or criminal law.

20. REVIEW AND AMENDMENTS

This Policy may be reviewed by the Board of Directors as and when required. In the event of any conflict between the provisions of this Policy and the Act or any other statutory enactments, or rules, the provisions of such Act or statutory enactments or rules shall prevail over this Policy. Any subsequent amendment / modification in the Act and/or other applicable laws in this regard shall automatically apply to this Policy.

Naveen Sawhney

Managing Director

DIN : 00893704

Dated: 26.05.2022

Place: New Delhi

For Cords Cable Industries Ltd.
Naveen
Director