

Company policy on Sexual Harassment of Women at workplace#

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



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I. Objective

Lloyd Insulations (India) Limited ('the Company' or 'LIIL') 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. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

II. 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 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.

III. Policy statement

- a) All LIIL employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All LIIL employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All LIIL employees are required to maintain a work environment, which is free from any kind of harassment.
- d) LIIL 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.

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

IV. 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 Regional 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" will be set up to deal with the complaint. A female LIL 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 LIL 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.

V. 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 LIL. If the outcome of an investigation by the Internal Complaints Committee shows that harassing

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behaviour has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

VI. Internal Complaint Committee (ICC)

(i) Following are the Members of the ICC, as nominated for the Company:

S no	NAME	DESIGNATION	EMAIL ID / CONTACT NO.	REGION
1	Ms. Sheetal	Presiding Officer	hr2@lloydinsulation.com 9313217718	DELHI
2	Ms. Tejinder Kaur	Member	cdnsect@gmail.com	DELHI
3	Ms. Jabeen Khanam	Member (LEGAL)	lloyd.legal@lloydinsulation.com 9873571528	DELHI
4	Ms. Lipika Bhattacharya	Member	lipika@lloydinsulation.com 9339832885	KOLKATA
5	Ms. Nora Dsouza	Member	spmunjial@lloydinsulations.com 9819498559	MUMBAI/ PITHAMPUR
6	Ms. Prableen Tuteja	External Member/ NGO	Tuteja.prableen@gmail.com 9873782854	External Member/NGO
7	Ms. S. Suganthi	Member	mss@lloydinsulations.in 9940634763	CHENNAI/ CHEYYAR

(ii) At all times, at least one half of the total Members of the ICC shall have to be women.

(iii) The Presiding Officer and every Member of the ICC shall hold office for not more than three (3) years from the date they were nominated.

(iv) The Presiding Officer or Member, as the case may be, shall be removed from the ICC, in case said Presiding Officer or Member of the ICC:

- publishes or communicates to the public, press or media, the contents of the complaint of Sexual Harassment or the inquiry proceedings, etc.; or
- has been convicted for an offence, or an inquiry into an offence under any law for the time being in force is pending against him/her; or

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- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- has so abused his/her position as to render his continuance in office prejudicial to the public interest,

In such scenario, the vacancy created by such removal shall be filled by fresh nomination by the Company.

- (v) In any event, the ICC shall, hold at least one (1) meeting every year and prepare an annual report and submit the same to the Company and to the District Officer.

The ICC shall have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company. The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

VII. 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 LIL 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.

VIII. No Retaliation

The Company observes zero tolerance to retaliation/reprisal against the complainant or person who, in good faith, has participated in or provided information pertaining to incident/s of Sexual Harassment. Any act of retaliation/reprisal should be reported to the manager of the HR department of the Company and will be subject to disciplinary action by the Employer.