

# TIL POLICY

ON

## PREVENTION, PROHIBITION & REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

Version 1.3

## THE POLICY COMMITMENT:

TIL Limited (also referred to as 'TIL' or as 'the Company') is an equal opportunity employer and is committed to providing a safe environment for all its employees free from discrimination at work including sexual harassment. In this context TIL has adopted and imbibed in entirety - India's first legislation specifically addressing the issue of workplace sexual harassment; the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as 'the POSH ACT').

The POSH ACT has been enacted with the objective of preventing and protecting women against workplace sexual harassment and to ensure effective redressal of complaints of sexual harassment. TIL is further committed to ensuring prevention and protection relating to workplace sexual harassment and to ensure redressal of complaints of sexual harassments for all employees of TIL, irrespective of gender. The 'Policy Guidelines for TIL Limited' extends beyond women and intends to provide protection against sexual harassment to all its employees at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

At TIL, while the Internal Complaints Committee (ICC) is formed to address the issues of sexual harassment, it is expected that all employees of the Company have a moral responsibility to ensure that their behavior is not contrary to this policy and that they sustain a work environment free from sexual harassment.

At TIL, any form/incident of sexual harassment at workplace is treated seriously and investigated without bias and with utmost confidentiality. Any person/employee found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. The Company also ensures protection of the complainant, witnesses and the identity of the complainant.

The following points are pertinent under the TIL's Internal Policy:

- a) All definitions of an 'aggrieved woman' shall deem to be read as 'aggrieved person'.
- b) The Internal Complaints Committee (ICC) constituted as per the POSH ACT shall be competent to receive any complaint of sexual harassment or in the nature of sexual harassment under Section 9 of the POSH ACT made by the 'aggrieved person'.
- c) The ICC shall conduct its business in strict adherence with the procedure set out under chapter IV and V of the POSH Act and the Rules framed thereunder.
- d) All the provisions set out under the POSH ACT and the Rules framed thereunder as amended from time to time shall be strictly followed by TIL in all matters relating to sexual harassment at workplace.
- e) TIL shall strictly adhere to the provisions under Chapter VI of the POSH ACT with special emphasis to providing a safe, secure and dignified working environment, free from all forms of harassment for proper implementation of the provisions of the statute.

**SCOPE:**

This policy applies to all categories of employees of the Company, including management, non-management, permanent, temporaries, contractual and trainees at their workplace or at client's sites. The workplace signifies - all offices, branches, factories or other premises where the Company's business is conducted.

The scope also implies all Company-related activities carried out at any other site away from the Company's premises as well as any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

**DEFINITION:**

Sexual harassment may be single or multiple incidents/acts involving sexual advances that are unsolicited and un-welcome. Sexual harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between a TIL employee and someone with whom the TIL employee deals with in the course of his/her work e.g.- a supplier or a customer/third party.

Sexual Harassment at the workplace includes [directly or by implication but not limited to]:

1. Unwelcome sexual advances (verbal, written or physical).
2. Demand or request for sexual favors; or any other type of sexually-oriented conduct.
3. Verbal abuse, sexually colored remarks or remarks of a sexual nature about a person's clothing or body, habit or preference.
4. Showing pornography, or other similar materials through email, SMS, WhatsApp etc.
5. Repeatedly asking to socialize during off - duty hours or continued expressions of sexual interest against the person's wishes.
6. Giving gifts or objects that are sexually suggestive.
7. Persistent stalking of a person.

TIL's policy of Sexual Harassment at the workplace has been framed in accordance with the provisions of the POSH ACT and the Rules framed thereunder. Accordingly, the policy covers all the key aspects of the Act, and for any clarification, reference should always be made to the POSH ACT and the provisions of the POSH ACT shall prevail. Furthermore, for the purpose of TIL- the Policy has been made inclusive and advocating gender equality.

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.

## Annexure 1

**“Internal Complaints Committee (ICC)” of TIL Limited:**

The Internal Complaints Committee at TIL as envisaged under the Sexual Harassment of Women at Workplace (Prohibition, Prevention and Redressal) Act, 2013 has been duly constituted with effect from 1st April, 2015. Presently the Committee comprises the following Members **(Reconstituted as on 16/12/2020)**:

1. Ms. Bipasha Sanyal	Chairperson
2. Ms. Chama Mookherji	Member (External)
3. Mr. Shibaditya Ghosh	Member
4. Mr. Kapil Vishwakarma	Member
5. Mr. Ajay Kumar Shah	Member
6. Ms. Sarita Surana	Member
7. Ms. Sunita Bangera	Member
8. Ms. Manashi Roy	Member
9. Mr. Abhishek Singh	Member
10. Ms. Jothika Das G	Member

Apart from the aforesaid Members, Ms. Tumpa Roy, Mr. Sekhar Bhattacharjee, Mr. Pinaki Niyogy and Mr. Malay Banerjee will be Invitees/Advisors to the ICC and can also be referred to by any aggrieved person/s at any time.

**The ICC is responsible for:**

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

You may please contact the Chairperson or any other member as mentioned above

## Annexure 2

**Amendment in the Policy**

In case of any amendments/change in the statute, the Policy shall be amended/modified accordingly.

**TIL Limited.**

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