

Prevention Of Sexual Harassment
(POSH)
Policy Document

Table of Contents

Introduction	3
Scope & Applicability	3
Definitions.....	3
Complaint Redressal Committee	4
Term of Office.....	4
Procedure for Redressal	5
Redressal.....	6
Frequency of Meeting & Quorum	7
Interim Measures.....	7
General Guidelines.....	7
Responsibilities.....	8
Information Dissemination.....	9

PREVENTION OF SEXUAL HARASSMENT (POSH)

INTRODUCTION

Orient Paper & Industries Limited is committed to create a healthy working environment that enables women employees to work without fear of prejudice, gender bias or sexual harassment. We value every woman employee and are committed to protect their dignity and respect.

The purpose of this policy is:

- to prevent any untoward incident related to sexual harassment involving the Employees;
- protection of women employees from sexual harassment at workplace and
- redressal of grievances related to sexual harassment.

SCOPE AND APPLICABILITY

This Policy extends to all Employees of Orient Paper & Industries Limited and is deemed to be incorporated in the service conditions of the Employees and comes into effect immediately.

DEFINITIONS

- **“Act”** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended from time to time.
- **“Aggrieved Woman”** shall have the meaning in relation to a Workplace, a women, of any age who alleges to have been subjected to any of Sexual Harassment by the Respondent.
- **“Committee”** means **Complaint Redressal Committee** of the Company.
- **“Employee”** shall include any person carrying out any work on behalf of the Company and may have been hired as Permanent, Temporary, Contractual or part-time basis etc, either directly or indirectly or through vendor organization.
- **“Respondent”** shall mean an Employee against whom the complaint has been filed.
- **“Sexual Harassment”** shall mean the harassment of a female employee and would consist of any unwelcome sexually determined behavior, whether directly or indirectly, by any male/female in charge of the management or a male/female co-employee, either individually or in association with other persons, to exploit the sexuality of a co-employee to harass her in a manner which prevents or impairs her full

utilization of full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory .

Sexual Harassment shall include but not limit to:

- Physical Contact & Sexual advances
 - Demand or request for sexual favors;
 - Sexually- coloured remarks;
 - Showing pornography;
 - Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.
- **“Workplace”** shall mean Company Premises and any place visited by the employee arising out of or during the course of employment.

COMPLAINT REDRESSAL COMMITTEE

The process of Redressal and Enquiry of all complaints pertaining to Sexual Harassment shall be managed by an Internal Complaints Committee (“Committee”).

1. The Committee shall consider and redress complaints of Sexual Harassment.
2. The Company is spread across various locations; hence the Company has formed both corporate level Committee and Plant wise Committees for respective locations.
4. The Committee will comprise of the following members:
 - The Presiding Officer should be a woman employed at a senior level at Workplace from amongst the Employees.
 - At least two members from amongst the employees committed to the cause of women or having experience in social work or legal knowledge
 - One member from a non-government organization (NGO) committed to the cause of women or a person familiar with the issues relating to sexual harassment

At least one half of the total members so nominated shall be women.

TERM OF OFFICE

The Presiding Officer and every member of the Committee shall hold office for a period not exceeding three years, from the date of their nomination.

PROCEDURE FOR REDRESSAL

1. Any Aggrieved Woman shall make a complaint of Sexual Harassment at Workplace by sending an email to either posh@orientpaperindia.com or to any member of the Committee in writing with her signature, within a period of three months from the date of occurrence of such incident and in case of a series of incidents, within a period of three months from the date of last incident. The Internal Committee, for the reasons to be recorded in writing, may extend the time limit up to further three months.
2. Where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee shall render all reasonable assistance to the Aggrieved Woman for making the complaint in writing.
3. 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 may make the complaint.
4. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
5. The Committee may, before initiating an inquiry and at the request of the Aggrieved Woman, take steps to settle the matter between her and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation, and where a settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same to the Employer to take action as specified in the recommendation.

The Committee shall provide the copies of the settlement, as recorded, to the Aggrieved Woman and the Respondent.

However, where the Aggrieved Woman informs the Committee that any term or condition of the settlement arrived has not been complied by the Respondent, the Committee shall proceed to make an inquiry into the complaint.

6. In all other cases, the Committee shall provide a copy of the complaint statement to the Respondent within a period of seven days of receipt of the complaint, and shall seek a written explanation from him/her within seven days of receipt of the copy of statement of complaint.
7. The Committee will hold a meeting with the Aggrieved Woman within seven days of receipt of the complaint.
8. The date and time of the meeting shall be notified in writing by the Committee to both the Aggrieved Woman and the Respondent.
9. The Aggrieved Woman shall be provided with a copy of the written explanation, submitted by the Respondent, within seven days of receipt of written explanation.
10. If the Aggrieved Woman does not wish to depose personally due to embarrassment of narration of the event, a lady officer shall meet the Aggrieved Woman and record the statement.

11. Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to the Respondent to give an explanation.
12. If the Aggrieved Woman or the Respondent desires to tender any documents by way of evidence before the Committee, they shall supply duly signed original copies of such documents.
13. If the Aggrieved Woman or the Respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of the witness/es that they propose to call.
14. The Committee shall provide every reasonable opportunity to the concerned parties for putting forward and defending their respective cases, and call upon witnesses mentioned by both parties.
15. In the event the complaint does not fall under the purview of Sexual Harassment or the complaint does not amount to an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
16. Where both parties are Employees, the parties shall, during the course of inquiry, be given an opportunity of being heard, and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
17. The inquiry shall be completed with a period of ninety days.

REDRESSAL

1. The Committee shall communicate its findings and its recommendations for action to the Management Team (MD, CEO/COO, and HR Head) within 24 hours of closing of enquiry.
2. The report of the Committee shall be treated as an enquiry report on the basis of which an Employee at fault can be awarded appropriate punishment straightaway.
3. The HR Head will direct appropriate action in accordance with the recommendation proposed by the Committee and the Management.
4. Disciplinary actions that may be taken include but are not limited, to the following:
 - Warning
 - Written apology from offender,
 - Bond of good behavior
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work assignment
 - Suspension
 - Dismissal
5. The Management shall take appropriate disciplinary actions in case:

- The complaint/ allegation is found to be false or malicious
- The Aggrieved Woman or any person making the complaint has made the complaint knowing it to be false
- The Aggrieved Woman or any other person making the complaint has produced any forged or misleading document
- Any witness has given or produced false evidence, forged or misleading document(s).

6. The final decision shall be communicated in writing to the Aggrieved Woman and the Respondent.

7. If either party desires to make an appeal against the decision, he/she may appeal in writing to the Managing Director within seven days of communication of the order, and that appeal shall be decided within one month.

FREQUENCY OF MEETING AND QUORUM

1. The Complaints Committee shall meet as and when the complaint is made.
2. The quorum of the Committee shall be 2. However, the member of NGO/person familiar with the issues relating to sexual harassment shall be present in the meeting.
3. The decision of majority shall be final and binding.
4. The minutes of every meeting shall be recorded in the Minutes Register maintained for the purpose by the Presiding Officer, or a person nominated in writing by the Presiding Officer.

INTERIM MEASURES

During the pendency of an inquiry, on written request made by the Aggrieved Woman, the Committee may recommend the Management to:

- Transfer the Aggrieved Woman or the Respondent to any other workplace or
- Grant leave to the Aggrieved Woman up to a period of three months or
- Grant such other relief to the Aggrieved Woman as it may think fit.

The leave granted to the Aggrieved Woman shall be in addition to the leave she would be otherwise entitled to.

GENERAL GUIDELINES

1. In case the Committee finds the prima facie case exists and is coverable under the Indian Penal Code, appropriate action shall be initiated by the Management for lodging a Police Complaint.

2. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and on priority by the Committee.
3. The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
4. Any incident which occurs as a result of an act or omission by any third party or outsider, the Management shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
5. All matters raised at the respective Plant shall be resolved along with the Plant's Committee.
6. The report of the complaint received, resolved and pending shall be sent to the Corporate Complaints Committee and Management on a quarterly basis.

RESPONSIBILITIES

Employees

Employees should familiarize themselves with the key elements of the policy and should:

1. Refrain from committing any acts which amount to sexual harassment at the Workplace.
2. Report incidents of Sexual Harassment without fear or favor.
3. Create an environment of conduciveness for co-workers to work together without fear of harassment.

HODs and Managers

HODs and Managers are encouraged to:

1. Provide appropriate working conditions in respect of work, leisure, health and ensure there is no hostile environment at the work place.
2. Report any complaint or grievance immediately to the concerned authorities.
3. Ensure there is no retaliation or retribution happening at the workplace where the supposed action is to have taken place.
4. Implement the disciplinary action.

HR Department

The HR Managers are encouraged to:

1. Conduct necessary communication and training across the company, with respect to sexual harassment at the workplace.

2. Ensure this policy is communicated, explained and handed over at the time of induction of every Employee.
3. Ensure appropriate training is provided to members of the Complaints Committee (s), including training on gender sensitivities.
4. Provide sufficient security at the entry as well as the exit points and in cases where women employees are transported from and to the work place working in late shift hours.
5. Provide appropriate medical assistance, if any need may so arise.
6. Keep separate vehicles ready to meet emergency situations, such as hospitalization, whenever there is a case of injury or harassment etc.
7. Clarify to employees on any queries related to this Policy.

INFORMATION DISSEMINATION

1. The Company shall display, at any conspicuous place in the workplace, the penal consequences of sexual harassments and also the constitution of Committee.
2. The Internal Committee shall, in each calendar year, prepare in such form at such time as may be prescribed in the Act, an annual report and submit to the employer and the District Officer.
3. The employer shall include in the annual report, the number of cases filed, if any, and their disposal under the Act.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Date: 02.02.2015

Place: Kolkata