

**SIGMA ELECTRIC MANUFACTURING CORPORATION PVT LTD.
DEALING WITH SEXUAL HARRASSMENT COMPLAINTS POLICY**

PURPOSE:

SIGMA ELECTRIC MANUFACTURING CORPORATION PVT LTD. ("SIGMA") is an equal employment opportunity company and is committed to create and maintain a work environment free of violence, harassment, exploitation, and intimidation. This includes all forms of gender violence, sexual harassment, and discrimination on the basis of sex/gender.

SCOPE:

This policy applies to 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, All Persons of Agents, Service Providers, Consultants who are providing their services to SIGMA. Herein after, called as "Persons" The scope of this policy covers all the matters which are arising out of & during working with, or for SIGMA.

POLICY:

The following acts/ incidents are / shall be constituted as Sexual Harassment:

- Unwelcome sexual contacts, advances, demands or requests for sexual favors, and verbal or physical conduct of a sexual nature made implicitly or explicitly;
- Unwelcome sexual advances involving verbal, non-verbal and/or physical conduct such as lewd comments, sexually colored remarks or jokes, letters, phone calls or e-mails, SMSs, gestures, exhibition of pornography, lurid stares, physical contact or molestation, stalking, sounds or display of pictures, signs, verbal, non-verbal, textual, graphic, electronic or any other kind of communication which is of a derogatory nature which has the purpose and/or effect of interfering with an one's performance or of creating an intimidating, hostile, or offensive environment;
- When person/s using, with a sexual purpose, the body or any part of it or any object as an extension of the body in relation to another person without the latter's consent or against that person's;
- Threat made of adverse consequences to a person's physical well-being or employment in case of non-submission to the sexual demands made.
- Deliberately creating a hostile or humiliating working environment in a manner that is sexually discriminatory or the person has reasonable grounds

to believe that one's objection would disadvantage one in connection with one's employment or work including recruiting, promotion or future employment status

The incidents / acts set forth herein above are only indicative in nature & do not present an exhaustive list on the subject.

Prohibition on Sexual Harassment:

- No Person at SIGMA shall sexually harass any other person working at or for SIGMA;
- Any Person, found engaging in sexual harassment practices shall be subjected to appropriate disciplinary action including dismissal from his / her / their services or terminating the contract or service agreement.
- Every Person at SIGMA shall take reasonable steps to prevent Sexual Harassment from being conducted at SIGMA and shall also assist SIGMA in its efforts against Sexual Harassment.

Sexual Harassment Complaints Committee and its Constitution:

- Based on the guidelines given in the present policy, a 'Sexual Harassment Complaints Committee' (**SHCC**) will be set up in SIGMA to which any complaint on Sexual Harassment shall be made for its redressal.
- SHCC shall consist of at least 3 (three) members with not less than half of its members being women and shall have a woman chairperson.
- SHCC shall have a third party such as a woman's rights activist(s), social worker(s), activist(s) from a NGO, counselor(s), lawyer(s), doctor(s), trade unionist(s) as one of its members.

Dealing With Sexual Harassment Complaints:

- All Persons of SIGMA are to be provided equal protection through SHCC.
- Procedure for registering a complaint & the mechanism to deal with it will be outlined by SHCC.
- Where Sexual Harassment occurs as a result of an act or omission by any third party or outsider, SIGMA shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In case the SHCC finds the degree of offence coverable under the Indian Penal Code or under any other law, then this fact shall be brought to the attention of the Management of SIGMA and appropriate action shall be initiated by SIGMA, for making a Police Complaint.

- An annual report will be furnished to the concerned government authorities whenever it is asked for & in the manner prescribed by it.

SAFEGUARDS:

SIGMA shall ensure that the following persons are not victimized or discriminated against while dealing with complaints of Sexual Harassment and every effort will be made by SIGMA to keep their identity confidential:

- Person(s) who has brought investigation under the present policy against any person.
- Person(s) who has alleged that any person has contravened a provision of this Policy
- Person(s) who has otherwise done anything in accordance with this Policy in relation to any person.

AWARENESS:

With the aim of ensuring that all Persons at SIGMA are aware of this policy, SIGMA shall issue notifications, publications, circulations and conduct awareness programs for SIGMA's Persons in English, Hindi and / or Marathi language(s).

AMENDMENTS:

SIGMA reserves the right to modify or amend this policy in part or as a whole at any time as it may deem necessary.

Should you have any questions in relation to this Policy, please contact company Compliance Officer or Head, Human Resources at your location.

SHP v.3
July 2013