

OMFURN INDIA LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. INTRODUCTION:

Omfurn India Limited (the “Company”) is committed to provide work environment that ensures every employee is treated with dignity and respect and equitable treatment. The issue of sexual or any type of harassment at the work place has become an extremely important factor which needs to be addressed strictly in accordance with law. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. APPLICABILITY:

This policy applies to all categories of employees of the Company, including permanent/temporary workers, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

3. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

- a. unwelcome sexual advances (verbal, written or physical);
- b. demand or request for sexual favours;
- c. any other type of sexually-oriented conduct;
- d. verbal abuse or ‘joking’ that is sex-oriented;
- e. Showing Pornography;

4. DEFINITIONS:

- a. Complaint – means a complaint of Sexual Harassment lodged with the Complaint Committee.
- b. Complainant- means an aggrieved employee who lodges a Complaint with the Complaint Committee.
- c. The workplace includes:
 - i) All offices or other premises where the Company’s business is conducted.
 - ii) All company-related activities performed at any other site away from the Company’s premises.

- iii) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d. Aggrieved- In relation to workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
- e. Respondent- means a person against whom a Complaint is made by an Aggrieved Employee.

5. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the aggrieved employee.

6. COMPLAINTS COMMITTEE:

The Company has formed a Complaints Committee for redressal of sexual harassment complaint made by the aggrieved employee and for ensuring time bound treatment of such complaints.

The Complaints committee will comprise of the following members:

- a. Presiding Officer: Mrs. Sonali Gandre shall be a woman employed at a senior level at workplace amongst the employees.
- b. Member - Meena Kadam Shall be amongst employees preferably committed to the cause of woman or who have an experience in social work or have legal knowledge.
- c. One Member- Bhavana Mishra amongst Non-Governmental Organisations or associations committed to cause of woman or a person familiar with the issues relating to sexual harassment.

Additional members will be added as may be required from time to time.

6. RESPONSIBILITY OF THE COMPLAINTS COMMITTEE (CC):

The Complaints Committee is responsible for investigating every formal written complaint of sexual harassment, discouraging and preventing employment-related sexual harassment, taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.

7. REDRESSAL MECHANISM:

The Policy provides for an informal and a formal process for redressal:

a. **Informal Grievance Redressal:**

When an incident of sexual harassment occurs, the aggrieved may directly communicate their disapproval and objections immediately to the harasser and request harasser to behave decently. If the harasser does not stop or if the complainant is not comfortable with addressing the harasser directly, the complainant can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

b. **Formal Grievance Redressal:**

- i. The aggrieved may make in writing a complaint of sexual harassment at workplace to CC within a period of fifteen days from the last incident. Provided that if the aggrieved is unable to write than they make take all assistance from the member of the Committee.
- ii. If the aggrieved is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by aggrieved person's-
 - (a) Relative or friend; or
 - (b) Co-worker; or
 - (c) Any person who has knowledge of the incident, with the written consent of the aggrieved.
- iii. Where the aggrieved 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 the aggrieved's written consent;
- iv. Once the Complaint is received the CC at the request of the aggrieved, take steps to settle the matter between the aggrieved and the respondent. Once the settlement is arrived at, CC shall record the settlement arrived at and forward the same to the employer to take action as specified in the recommendation. The committee shall provide the copies of the settlement to the aggrieved and the respondent. Where a settlement is arrived, no further inquiry shall be conducted by CC. However if the aggrieved informs ICC that any term or condition of the settlement arrived at has not been complied with by the respondent, CC shall proceed to make an inquiry into the complaint or forward the complaint to the police. Where both the 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.
- v. During the pendency of inquiry, ICC may recommend to the employer such relief to the aggrieved as it may consider appropriate and in line with all the applicable statutory laws.

The employer shall implement such recommendations, and send report of such implementation to CC.

- vi. On completion of the inquiry, CC shall provide a report of its findings to the employer, within a period of 10 days from the date of the completion of the inquiry and such reports can be made available to the concerned parties.
- vii. Where the allegation of the respondent is proved by CC, it shall recommend the employer to grant such relief to the aggrieved which shall be in line with the applicable statutory laws.
- viii. Where CC comes to a conclusion that the allegation against the respondent is not proved, it shall recommend to the employer that no action shall be taken in the matter.

8. MANNER OF INQUIRY:

- a. At the time of filing complaint, the complainant shall submit 4 copies of the complaint along with the supporting and also the details of witness to the CC;
- b. On receipt of the complaint, CC shall send one copy of the same to the respondent within 7 days;
- c. The respondent has to file its reply to the CC within a period of 10 days from the date of receipt;
- d. In case the respondent fails to present themselves within the prescribed time and fails to present themselves for three consecutive hearings the committee shall have the right to decide the case ex-parte on the complaint. The Committee however cannot terminate or pass an ex parte decision unless a notice is giving in 15 days advance to the parties concerned.
- e. The parties shall not be allowed to bring any legal practitioner to represent them.

9. FALSE COMPLAINTS:

If an Employee is found to have raised a false complaint against another person in order to prejudice that person, the complainant may also be subject to appropriate disciplinary action, which may include termination of employment, engagement or relationship with the Company, as the case may be.

10. ACTIONS TO BE TAKEN:

If the Committee arrives at a conclusion that the allegation against the respondent has been proved, it shall recommend the employer to take following actions:

- a. Warning;
- b. Terminate from the service;

- c. Withhold promotion;
- d. Withholding of pay rise
- e. Written apology

11. **CONFIDENTIALITY:**

All parties involved in any Sexual Harassment matter must keep all aspects of the matter confidential. For some offences if the Complainant desires, the CC will be under an obligation to report matters to the police/or file an FIR.

12. **PROTECTION:**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the aggrieved or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.