

## Preventing Sexual Harassment at the Workplace

### Introduction:

Metal Power Analytical Pvt. Ltd. & its Associate Companies (“**Metal Power/Company**”) are committed to fostering a work environment that is safe, respectful, and free from all forms of discrimination and harassment. This policy is a cornerstone of our dedication to maintaining a workplace where every individual is treated with dignity and fairness.

Sexual harassment is a serious concern that affects individuals, teams, and the entire organization. It not only compromises the well-being of employees but also undermines trust, collaboration, and productivity. Our Prevention of Sexual Harassment at Workplace Policy is designed to establish clear guidelines and expectations for behaviour, ensuring that every employee can work in an environment that upholds their rights and safeguards their comfort.

### Purpose of the Policy:

Our policy serves several essential purposes:

1. **Creating a Safe Space:** We believe that every employee deserves to work in an environment that is free from any form of sexual harassment. This policy is a testament to our commitment to providing a safe and respectful space for all.
2. **Preventing Harassment:** By defining and addressing sexual harassment, we actively work to prevent its occurrence. We aim to educate employees about what constitutes harassment and encourage a collective effort to eliminate it.
3. **Promoting Equality:** Our policy reinforces our dedication to equal treatment of all employees, regardless of gender, background, or position. We believe that diversity is a strength, and our policy helps create a culture that values and respects differences.
4. **Encouraging Reporting:** We recognize that reporting an incident of sexual harassment can be challenging. Our policy establishes multiple reporting channels, confidentiality measures, and protection against retaliation to encourage employees to come forward without fear.
5. **Supporting Victims:** For those who experience harassment, our policy provides guidance on how to report, what to expect during an investigation, and the support available. We are committed to offering a helping hand to those who need it.
6. **Fostering Accountability:** Every member of our organization, from leadership to employees at all levels, is accountable for upholding this policy. By adhering to its principles, we collectively create an environment where harassment has no place.
7. **Legal Compliance:** Our policy aligns with applicable local, national, and international laws related to preventing sexual harassment. This demonstrates our dedication to operating within the framework of the law and ensuring ethical conduct.

We encourage every employee to familiarize themselves with this policy, participate in our educational initiatives, and actively contribute to building a workplace that exemplifies respect, inclusivity, and professionalism. Together, we can create an environment that reflects our values and supports the growth and well-being of every individual within our Metal Power family.

### **Scope of the Policy:**

This policy applies to all categories of Employees (as defined below) at their workplace or at client sites. The Company will also not tolerate any form of sexual harassment by clients or by suppliers or any other business associates.

The workplace defined for this policy are:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
4. Any place visited by the Employee arising out of during the course of employment including transportation by the Company for undertaking such journey.

### **Definition of Sexual Harassment:**

1. "Act" means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
2. "Aggrieved Woman" means a woman of any age, in relation to the workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent.
3. "Complaint" is meant to be construed, defined, understood and interpreted as a formal allegation of harassment submitted in writing or otherwise by the aggrieved woman to the Internal Complaint Committee (ICC).
4. "Conciliation" is a process to resolve conflict/complaint by the Internal Complaint Committee (ICC) on the specific request of the aggrieved employee in the manner provided under the Act.
5. "Employee" means a person employed at a workplace for any work on a 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, a contract worker, probationer, trainee, apprentice or called by any other such name.
6. "Harassment" is any improper conduct by an individual, that is directed at and offensive to another person or persons in the workplace, and that the individual knew or ought reasonably to have known would cause offence or harm. It comprises any objectionable act, comments or display that demeans, belittles, or causes personal humiliation or embarrassment, and any act of intimidation or threat. It includes harassment within the meaning of the "Protection of Human Rights Act, 1993" and applicable international and United Nations conventions and treaties.

7. "Internal Complaints Committee" (ICC) means a committee constituted by the Company as per this Policy.
8. "Respondent" means a person against whom the aggrieved woman has made a complaint in respect of sexual harassment at the workplace.
9. "Rules" shall mean the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013
10. "Sexual Harassment" shall mean and include any one or more of the following unwelcome acts or behaviour (whether directly or implicitly) namely:
  - a) Physical contact and advances or
  - b) A demand or request for sexual favours or
  - c) Making sexually coloured remarks or
  - d) Showing pornography or
  - e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

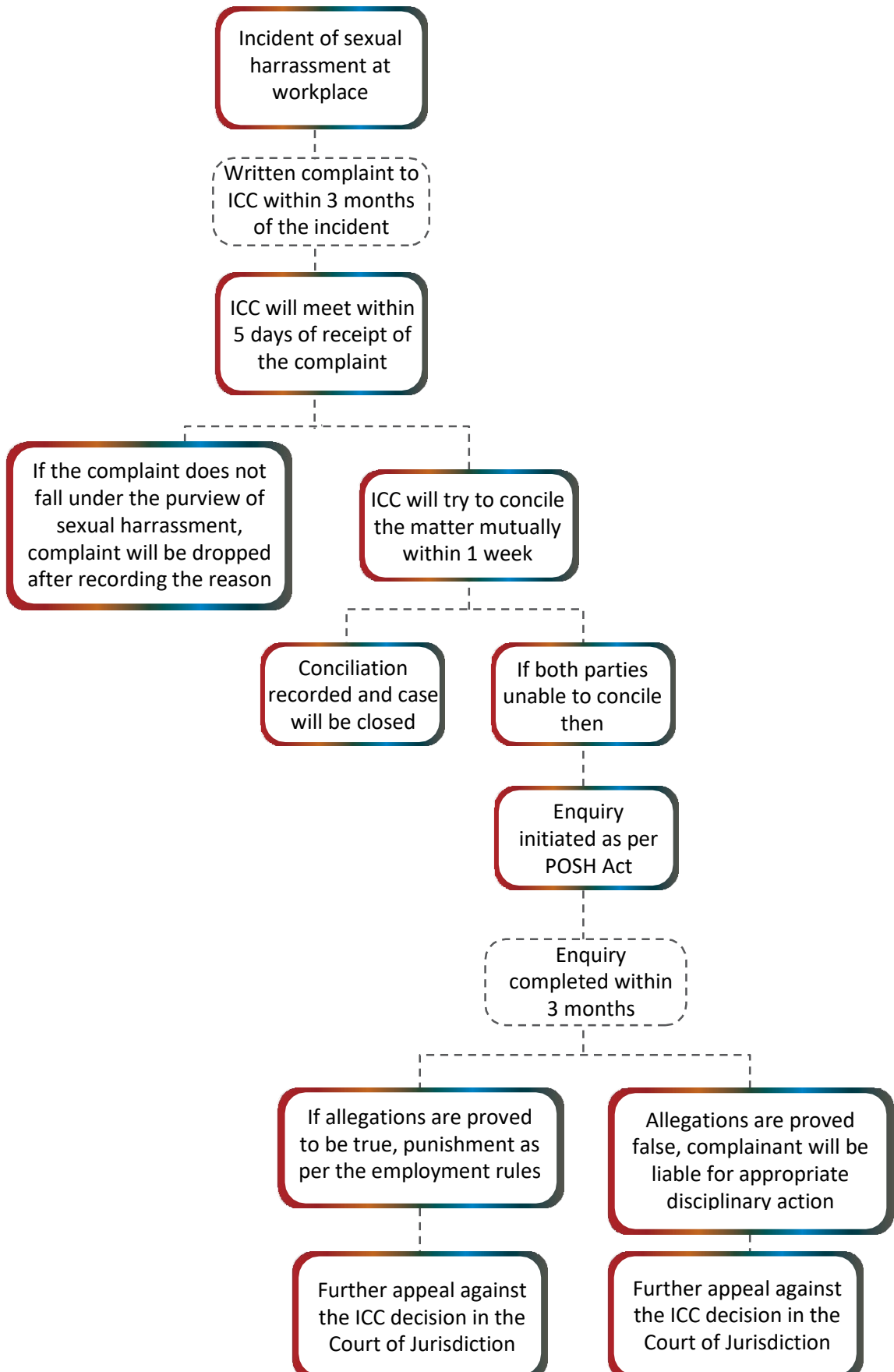
Sexual harassment also includes any of the following:

- a) Unwelcomed sexual advances, requests or demands for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- b) Unwelcomed sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance.
- c) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy.
- d) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other gender
- e) Conduct of such an act at workplace or outside in relation to an employee of the Company, or vice versa during the course of employment and
- f) Any unwelcomed gesture by an employee having sexual overtones.

### **Responsibilities:**

1. Employees are responsible for fostering a harassment-free work environment.
2. The Internal Complaint Committee and Head of Human Resources are the final authority for this policy.

### Reporting, Investigation & Disciplinary Action Procedure



1. The complaint process, including the investigation, if necessary, shall be completed without undue delay.
2. Corrective action shall be taken timely and the same shall be communicated to all the parties involved.
3. Action for misconduct may be corrective or disciplinary measures being taken, up to and including termination.
4. Disciplinary or corrective measures may also be taken against the following:
  - a) Any manager who was aware of the harassment situation and failed to take corrective action
  - b) Anyone who interferes with the resolution of a complaint by threats, intimidation or retaliation; or
  - c) Anyone who files a complaint that is frivolous or malicious in nature.

### Support and Resources:

Complaints can be sent to [iccpsh@metalpower.net](mailto:iccpsh@metalpower.net) or to any of the ICC members' email addresses available internally.

### Training and Awareness:

At Metal Power, we firmly believe that education and awareness are pivotal in preventing and eradicating sexual harassment from our workplace. Our commitment to fostering a respectful and inclusive environment extends beyond policies; it involves continuous learning and proactive initiatives. As part of this commitment, we offer regular training and awareness programs focused on the prevention of sexual harassment.

### Our Approach:

1. **Comprehensive Workshops:** We conduct comprehensive workshops that are designed to educate employees at all levels about the different forms of sexual harassment, their impact, and the behaviors that constitute harassment. These workshops emphasize the importance of creating a culture of respect and accountability.
2. **Recognizing Red Flags:** Our training sessions focus on helping employees recognize potential red flags of harassment, ensuring that individuals are equipped to identify and address problematic behavior promptly.
3. **Understanding Rights and Responsibilities:** We provide clear insights into the rights and responsibilities of both victims and others. Understanding these roles is crucial in promoting a supportive atmosphere and facilitating prompt reporting.
4. **Addressing Unconscious Bias:** Our training also addresses unconscious biases that can contribute to harassment. By fostering awareness of these biases, we work towards creating a more equitable and harmonious work environment.

5. **Promoting Inclusivity:** We integrate discussions on diversity and inclusion into our training programs, emphasizing the importance of embracing differences and respecting individual boundaries.
6. **Interactive Learning:** Our training sessions are interactive and encourage open dialogue. Participants are encouraged to ask questions, share experiences (if comfortable), and engage in discussions that promote understanding.

#### **Frequency of Programs:**

- **New Employee Onboarding:** All new employees undergo mandatory training during their onboarding process to ensure they are familiar with our harassment prevention policies and principles from day one.
- **Annual Refresher Training:** We offer annual refresher training for all employees to reinforce awareness and update them on any policy changes.
- **Supervisor and Leadership Training:** Supervisors and leaders receive specialized training to equip them with the skills to address and prevent harassment effectively.

#### **Beyond Training:**

Our commitment to preventing sexual harassment goes beyond training sessions. We encourage open communication and maintain accessible channels for employees to voice concerns, seek guidance, and report incidents. Through continuous education, awareness, and open dialogue, we aim to create a culture where every individual feels safe, respected, and empowered.

**Non-Retaliation:** Metal Power prohibits retaliation against those who report or participate in investigations. All complaints and enquires conducted will be confidential.

**Updates to the Policy:** The policy will be updated as needed to align with legal changes and best practices.

**Contact Information:** For more information, you can write to [iccpsh@metalpower.net](mailto:iccpsh@metalpower.net)