

M/s LDS RUBBER TECH as the organisation is committed to integrity and ethical principles and it cannot tolerate any member of the organisation sexually harassing another. This policy connotes sexual harassment, consequences of sexual harassment and mechanisms for redressal.

**1. Objective:**

To provide a professional, trusting and dignified working environment.

**2. Short Title, Extent and Commencement:**

This Policy will be known as The Policy on Sexual Harassment in LDS RUBBER TECH. The Policy is effective 01.12.2022 and extends to all employees in Company and is deemed to be incorporated in the service conditions and Standing orders of all employees.

**3. Definitions:**

“Sexual harassment includes any or all of the following:

- a. Unacceptable sexually determined behaviour (whether directly or by implication) as making or attempting to make through innuendos or otherwise
  - Physical contact and advances
  - A demand or request for sexual favours
  - Sexually coloured remarks (iv) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature Or
  - Verbal abuse and usage of language that has sexual implications
  - Taking photographs of a person for non-official purposes without the consent of the person.
- b. Conducting of one-to-one meetings in non-official locations without the consent of the parties involved.
- c. Exchanging or circulating e-mail/mail/SMS/MMS with sexual overtones,
- d. Any other unacceptable physical, verbal or non-verbal conduct of a sexual nature, which offends the privacy, decency and dignity of an individual.

**4. Policy Statement:**

This Policy, “Sexual harassment shall include, but will not be confined to the following:

- (i) Sexual advances, requests for sexual favours, and/or verbal or physical conduct of a sexual nature made, either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person’s engagement in any company activity.
- (ii) Sexual advances and/or verbal, non-verbal or physical conduct such as
  - Remarks or jokes or Gestures,
  - letters, phone calls or e mail,
  - showing of pornography,
  - physical contact or molestation,

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- o Intimidation or offensive environment.
- (iii) Eve teasing, innuendos and taunts, physical confinement against one's will and any other act likely to impinge upon one's privacy and decency.

**5. Scope of the Policy**

This Policy and Guidelines will be applicable to all full-time and part time employees of the Company. This policy and guidelines applicable to all incidents and complaints of sexual harassment made by a third party if the acts of sexual harassment complained of are alleged to be committed in his/her status / capacity as an employee of the Company.

**6. The Complaints Committee**

A Complaints Committee constituted to deal with any complaints of sexual Harassment.

- (a) To serve as grievance redressal forum and deal with complaints of sexual harassment.
- (b) To advise on the provision of counseling / appropriate support to victims.

**7. Composition of Committee:**

The Committee shall consist of 5 members – 3 women & 1 men from within the company and 1 external member, who shall be a lawyer or a social activist, and who is sensitive to the issue of sexual harassment.

**8. Procedure for Redressal of Grievances**

- a) A complaint of sexual harassment by any employee or worker of LDS RUBBER TECH shall be made in writing by any person to any member of the Committee.
- b) The Committee shall within 4 days formulate its plan of action and, depending on the facts and circumstances of the case, take appropriate steps to investigate the matter
- c) The Committee shall give complainant and accused an opportunity of being heard and their statement shall be recorded.
- d) In the event, the complaint does not fall under the purview of Sexual harassment. The Complaints Committee may drop the complaint after recording the reason(s) thereof.
- e) The complaints committee shall record in detail all the proceedings of the enquiry.
- f) The complaints committee shall hand over a copy of the Complaint and the statement of the complainant to the accused and give an opportunity to the accused to submit a written explanation if she/he so desires within 2 days of receipt of the same.
- g) The complainant shall be provided with a copy of the written explanation submitted by the accused.
- h) The committee will call upon all witnesses mentioned by both the parties and record their evidence.
- i) The must make its best endeavour to give its findings or report on the case within 10 days of the complaint being lodged.
- j) The Report shall be forwarded to the Managing Director of the Company.
- k) The committee may terminate the inquiry or give ex-parte decision, if complainant or respondent is absent for 3 consecutive hearings, without sufficient reason. 15 Days written notice is to be given to the party, before termination or enquiry or Ex-parte order.



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### 9. Disciplinary Action

The Committee will, in its report, recommend the disciplinary action(s) to be taken against the Accused.

Depending on the severity of the case, consequences can include

- o Apology
- o Counseling
- o Transfer
- o Dismissal
- o Demotion or
- o Other forms of disciplinary action.

### 10. False complaint action

Immediate disciplinary action will also be taken against anyone who victimizes or revenge against a person who has complained of sexual harassment.

### 11. Obligation of the Management



The Management of the Company shall provide all necessary assistance/resources for the purpose of ensuring full, effective and speedy implementation of this Policy.

### 12. Modification

In the interest of eliminating sexual harassment, the company reserves their right to modify the policy for stricter enforcement if deemed necessary.

### INTERNAL COMMITTEE MEMBERS

S.N	NAME	DEPARTMENT	POSITION
1	Shalni	Legal / Advocate	President
2	Suhirtha	HR	Vice President
3.	Venishiya	Accounts	Member
4.	Archana	Sales	Member
5.	Sriba	Production / Supervisor	Member

Prepared by	Approved by
	
ESG Coordinator	Director / MD