

POLICY FOR PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

E TO E TRANSPORTATION INFRASTRUCTURE LIMITED

(Formerly E TO E TRANSPORTATION INFRASTRUCTURE PRIVATE LIMITED)

CIN: U45201KA2010PLC052810

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1. Scope

This policy is made in accordance with "The Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act 2013 in order to achieve the objectives of the said Act.

2. Purpose

To provide mechanism for the prevention, prohibition and redressal of sexual harassment against women employees, women domestic workers and women visitors.

3. Definitions

"Aggrieved Person" means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent

"Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

"Employer" for the purpose of this policy, refers to any person or board or committee responsible for management, supervision and control of the Workplace, including formulation and administration of policies of the Company.

"Internal Complaints Committee (ICC)" refers to the internal redressal committee established within the Company to receive and inquire complaints pertaining to sexual harassment at Workplace incidents and provide its final recommendations to the Employer, i.e. management of the Company for implementation. The details of the current ICC members across all locations of the Company is mentioned in Annexure I of this Policy.

"Respondent" means a person against whom the aggrieved person has made a complaint.

"Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:-

- (i) implied or explicit promise of preferential treatment in her employment; or
 - (ii) implied or explicit threat of detrimental treatment in her employment; or
 - (iii) implied or explicit threat about her present or future employment status; or
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- (iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- (v) Humiliating treatment likely to affect her health or safety.

“**Workplace**” includes all Company premises and shall include any place visited by the employee in the course of employment including transportation provided by the employer for undertaking such journey.

4. Internal Complaints Committee

The Company has constituted Internal Complaints Committee (ICC) at all its offices or work locations having 10 or more employees. As per the POSH Act, the ICC shall comprise of:

- Every ICC will be headed by a senior women employee. If no woman in senior cadre is available in a branch, then presiding officer shall be nominated from another branch.
- ICC shall have two more employees as members and one external member who are committed to the cause of women. At least half of the members of ICC shall be women.
- The Committee shall be reconstituted once in three years.

5. Filing of Complaint

- Any women employee alleging any act of sexual harassment against her shall complain in writing to the Internal Complaints Committee within 3 months from the date of such incident.
- Within 07 days from the date of receipt of any complaint, ICC shall commence conciliation proceedings to redress such complaints. No monetary settlement shall be made as a basis of conciliation. If conciliation fails, enquiry proceedings in a manner similar to that of a Civil Court shall be initiated. The enquiry shall be completed within a period of 90 days.
- Within next 10 days, report shall be submitted to the employer. The employer shall act upon the recommendation within sixty days of its receipt.

6. Rules

Where the Presiding Officer or any Member of the ICC:

- (a) Contravenes the confidentiality of the complaint contents and proceedings; or
 - (b) Has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him/her; or
 - (c) He/She has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
 - (d) Has so abused his/her position as to render his/her continuance in office prejudicial to the public interest, such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination.
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False Complaint: Action can be initiated against false complaint as per the employment rules. Mere inability to substantiate a complaint or provide adequate proof shall not be construed as false complaint.

Annexure I

INTERNAL COMPLAINTS COMMITTEE

For Corporate Office - Bangalore

Presiding Officer - Ms. Sreedevi Kumar

Member - Ms. Vijayalakshmi

Member/Secretary - Ms. Srilakshmi Surendran