



**Policy on Prevention of Sexual
Harassment at Workplace
CMR Group**

This policy is meant exclusively for the perusal of, and strictly for circulation within, the CMR Group. Please note that sharing of policy information, other than with employees of the CMR Group, without written consent from MD would be construed as a breach of the Group's Code of Conduct.

Version Control DetailsTitle: Policy on Prevention of Sexual Harassment at Workplace

Version	Circular Number	Release Date	Summary of Changes
V0	CMR/SOP/Grp/HR - 1025/Rev-00/2019	01-09-2019	Policy inception
V1	CMR/Pol/Grp/HR/POSH /Rev-01/2023	01-10-2023	Policy revision

*Valid till next revision.

POLICY TITLE	Policy on Prevention of Sexual Harassment at Workplace
EMPLOYEE VALUE PROPOSITION	Clearly defined guidelines for prevention of sexual harassment at workplace
APPLICABILITY	This policy is applicable to all CMR staff, workers, contractors and visitors to ensure to provide safe working conditions at the workplace.
EFFECTIVE DATE	1 st October 2023



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POLICY ON PREVENTION OF SEXUAL HARRASMENT AT WORKPLACE

1. Introduction

As an organization, CMR Green Technologies Limited (CMR) is committed to ensuring that the work environment at all its locations is conducive to fair, safe and harmonious relations between employees. Discrimination and harassment of any type/form is strictly prohibited. We place high importance in creating a discrimination free workplace and any violation is not tolerated as part of our employee practices.

We ensure that no employee is at a disadvantage due to gender discrimination. This note therefore enunciates the Company's approach and policy to deal with any issue of sexual harassment at work place.

2. Scope of this Policy

This policy applies to all employees who are employed in a permanent or temporary capacity at any business location or deployed/visiting at customer site by the Company or any visitors to any of the premises of the company. The premises include any transportation provided by the company. This policy document will be made available to all locations associated with the Company with a clear objective to establish a similar approach in dealing with this issue.

3. Definitions

A broad definition of sexual harassment consists of any physical or verbal behavior and any form of communication that has unnecessary, improper or unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances. It may consist of, but not be limited to, any of the following:

- 3.1 Unwelcome sexual advances, requests for sexual favors, display of sexual visuals, sexual audios, pornographic or obscene material and any other verbal or physical conduct of a sexual nature
- 3.2 Transmitting any message, by mail, telephone, e-mail etc. which is obscene, lewd, suggestive or blatantly sexual in nature
- 3.3 Any explicit or implicit communication wherein a sexual favor or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. thereby creating a hostile environment
- 3.4 Making sexually coloured remark; or
- 3.5 Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes
- 3.6 Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings
- 3.7 Any pervasive pattern of behavior which makes any individual uncomfortable, insecure or feel humiliated or disadvantaged on the basis of gender differentiation.
- 3.8 Physical & sexual assault



- 3.9 Any other unwelcome physical, verbal or non – verbal conduct of sexual nature (as per section 2 clause (n) of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the POSH ACT, 2013).

4. CMR's policy on Prevention of Sexual Harassment

The Company policy is to totally prohibit any form of sexual harassment in the way employees behave with each other. This would also include complaints relating to instances outside of the workplace. This applies equally to all employees of CMR. Any incident of sexual harassment will be taken extremely seriously and compliant of this nature will be immediately investigated and appropriate action will be taken against the offending employee/s, if found guilty. Such penal action will depend on the nature and seriousness of the offence and may include strict disciplinary action including and up to termination of services.

5. Internal Complaints Committee (ICC)

The Company has established an Internal Complaints Committee for Sexual Harassment consisting of three (3) internal members and one (1) external member. The names of the members of this Committee and their contact details will be mentioned in Annexure-I at Group level and Unit level.

Unit Level Committee: This committee will receive and investigate into complaints related to sexual harassment and submit its' recommendations to the Management Team.

Group level Committee - This will be the higher-level committee to the Unit committees. This committee will meet on need basis to review reported cases of POSH violation, decide on any appeals raised against decision of unit level committee, and monitor adherence to POSH Policy.

Note:

- a) Half of the total members of ICC shall be women.
- b) The Presiding Officer and Every Member of the Internal Committee shall hold office for a period of three years only from the date of nomination as may be specified by the employer

6. Complaints Handling Process

The company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

Process for dealing with incidents of sexual harassment:

- 6.1 Any victim who experiences sexual harassment can get in touch with any member of the ICC whose contact details are provided in this document for convenience and confidential access. Alternatively, the Victim may write to posh@cmr.co.in and also the email id of Presiding Officer of ICC for convenient and confidential redressal by the Internal Complaints Committee.
- 6.2 On receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter and ensure confidentiality of the legal proceedings.

- 6.3 On completion of inquiry under this act, the ICC shall provide a report of its findings to the Employer/Management within a period of 10 days from the date of completion of the inquiry and such report be made available to the concerned parties (As per POSH ACT).
- 6.4 The employee/s who has allegedly committed the offence, would be given all reasonable opportunities to be heard by the Committee following the principles of natural justice.
- 6.5 The result of this investigation will be formally recorded and communicated to the Management, along with a recommendation from ICC for appropriate action.
- 6.6 In the case of a multi-locational context, one of the committee members will travel to the location in question as is required to ascertain the facts based on which the committee would discuss and assess the complaint in question.
- 6.7 Necessary action will then be initiated by management based on the recommendation of the investigating committee/ICC based on the circumstances and seriousness of the offence.
- 6.8 If it is found that the respondent/accused person is guilty the action shall be taken against the accused person as per Section 13 of the POSH Act, 2013.
- 6.9 The Employer/Management shall act upon the recommendation of ICC within 60 (Sixty) days of its receipt.
- 6.10 The Company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.
- 6.11 In order to ensure that this important matter is not trivialized, any complaint, which, in the opinion of the Committee, is found false or frivolous after due inquiry would be viewed very seriously by the Company and appropriate action shall be taken against such complainant/s as per Section 14 of POSH ACT, 2013.
- 6.12 If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the Plant Head or Cluster Head concerned with the relevant Plant or Location. The matter will be fully examined by the concerned Plant Head/ Cluster Head and its conclusions and plans for necessary action will be communicated to the Committee.
- 6.13 Plant Head and/or Cluster Head at all Company locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the Company policy on this matter. In case they become aware of any such incident, they will immediately inform the head of the Committee and take appropriate action as advised.
- 6.14 We believe in No Retaliation against those employees who have raised concerns of this nature in good faith and the issues raised will be investigated fully.
- 6.15 If the victim of sexual harassment feels unsatisfied with the outcome of her/his complaint to the Unit Complaints Committee as the case may be, she/he may appeal to the Group Complaints Committee. This committee, after hearing the appeal, shall review the case take appropriate action. The decision of the Group Complaints Committee will be final.

7 Amendment

This policy is subject to modification, amendment and alterations, in part or whole, by the Management without assigning any reasons or without giving any prior intimation. This Policy is subject to any law, currently in force, relating to Sexual Harassment at workplace.



Summary of Changes

Revision	Effective Date	Changes	Reason
Revision 01	01-10-2023	In Clause 5, Introduced Unit Level and Group Level Complaints Committees	As per our previous policy CMR/SOP/Grp/HR - 1025/Rev-00/2019 effective date 01-09-19. There was only one Complaints Committee.
Revision 01	01-10-2023	Point 6.1 Under Clause 6 Central Mail id to write POSH Complain i.e posh@cmr.co.in along with ICC member mail id	As per our previous policy CMR/SOP/Grp/HR - 1025/Rev-00/2019 effective date 01-09-19. Mail id was posh@century.in
Revision 01	01-10-2023	Added Point 6.15 Under Clause 6 i.e If the victim of sexual harassment feels unsatisfied with the outcome of her/his complaint to the Unit Complaints Committee as the case may be, she/he may appeal to the Group Complaints Committee. This committee, after hearing the appeal, shall review the case and take appropriate action. The decision of the Group Complaints Committee will be final	The Point was not available in Previous policy. CMR/SOP/Grp/HR - 1025/Rev-00/2019 effective date 01-09-19
Revision 01	01-10-2023	CMR/SOP/Grp/HR - 1025/Rev-00/2019 effective date 01-09-19 – Point 5.7 under clause 5 eliminated .	-


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Approved by,
Mohan Agarwal
Managing Director

MY COMMITMENT

I, Mr./Ms. _____, as a member of the CMR Group, have read and understood the Group's Policy to Address Sexual Harassment. I hereby commit to abide by this document in letter and spirit, a copy of which has been made available to me.

(Name & Signature)

Date :

Place :

Note : Each employee is requested to complete this and hand it over duly signed to the HR Division of your Unit (to be retained in the employee file

