

Supertech Limited

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. 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. It is

II. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at ongoing construction sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes:

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.

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

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1. physical contract and advances; or
2. Demand or request for sexual favours, or
3. making sexually coloured remarks; or
4. showing pornography, or
5. any other unwelcome physical, verbal, or non verbal conduct of sexual nature.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Internal Complaints Committee**” has been constituted in the Company for time-bound redressal of the complaint made by the victim/complainant.

VI. COMPLAINTS COMMITTEE:

The Company has constituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following four members:

1. Joint Managing director Mrs Sangita Arora (**Presiding Officer**)
2. Head-Corporate HR Mr Arpan Anand (**Member**)
3. Employee at the level of General Manager or above Mrs. Mandeepa Ahluwalia Joshi (**Member**)
4. Member from an NGO or Lawyer Mr V.PS Arora (**Member**)

Initial enquiries shall be conducted by the members of the committee and they shall communicate their finding to the Presiding Officer who will award appropriate punishment or disciplinary action.

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The Complaints Committee is responsible for:

- ❖ Investigating every formal written complaint of sexual harassment
- ❖ Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- ❖ Discouraging and preventing employment-related sexual harassment.

A quorum of any 2 (two) members is required to be present for the proceedings to take place.

VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

Any employee who feels that he or she has been sexually harassed should immediately report the incident to Internal Complaints Committee ("Committee") in writing or in any case shall report the incidence within 10 days from the date of occurrence of the alleged incident for prompt and effective action. Any delay in lodging complaint may be condoned depending upon facts and circumstances of the matter.

As an alternative, the Company has set up an email which employees may use to make initial reports of harassment.

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The Committee will maintain the records to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

The members of the Committee will hold a meeting with the Complainant within 07 days of receipt of the Complaint.

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The complaint shall contain all the material, documentary proof, oral or written material and relevant details concerning the alleged sexual harassment including the names of the person against whom the complaint is made and the complaint to substantiate his/her complaint.

The Members of the Internal Committee shall immediately proceed with enquiry and communicate the same to the complainant and person against whom the complaint is made.

The Members of the Committee shall prepare and handover the statement of allegation to the person against whom complaint is made and an opportunity shall be given to him/her to submit a written statement (WS) if he/she desires within a period of 07 days. The Complainant shall be provided the copy of the WS.

The Members of the Committee shall call upon all the witnesses mentioned by both the parties.

Every reasonable opportunity shall be provided to both the parties for contesting and defending their respective case.

The enquiry shall be completed within 60 days and the members of the committee shall communicate its findings to the Presiding Officer who shall on the basis of recommendation of the committee will recommend to the management for appropriate punishment or disciplinary action.

In case the committee finds the degree of offence coverable under the relevant provisions of law, then this fact shall be mentioned in its report and appropriate Disciplinary Action shall be initiated by Management including lodging of a Police Complaint.

In the event the Complaint does not fall under the purview of sexual harassment it shall be dropped after recording the reasons thereof.

In case the Complaint is found to be false the Complainant shall be liable for appropriate disciplinary action by the management.

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Where Sexual Harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

The Committee shall be governed by such rules as may be framed by the Indian law or any legislations from time to time.

B. DISCIPLINARY ACTION

The Disciplinary action shall commensurate with nature of harassment or violation of law.

If any employee of the Company is found guilty, the following disciplinary action may be taken by the management.

- (1) Warning
- (2) Written apology
- (3) Reduction to lower grade
- (4) Reduction of Increment
- (5) Demotion
- (6) Stoppage of Promotion for two years or more depending upon the gravity of case
- (7) Reassignment of duties including debarring from supervisory duties
- (8) Accepting Bond of Good Behaviour.
- (9) Discharge
- (10) Dismissal.
- (11) Transfer
- (12) Any other appropriate disciplinary action or course of action as deemed fit by the Management.

In case an outsider is involved as accused, the Internal Complaint Committee shall initiate action by making complaint with the appropriate authority.

VIII. CONFIDENTIALITY:

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The Company understands that it is difficult for the Complainant/victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the Complainant/victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

IX. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

X. PROTECTION TO COMPLAINANT / VICTIM:

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 victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

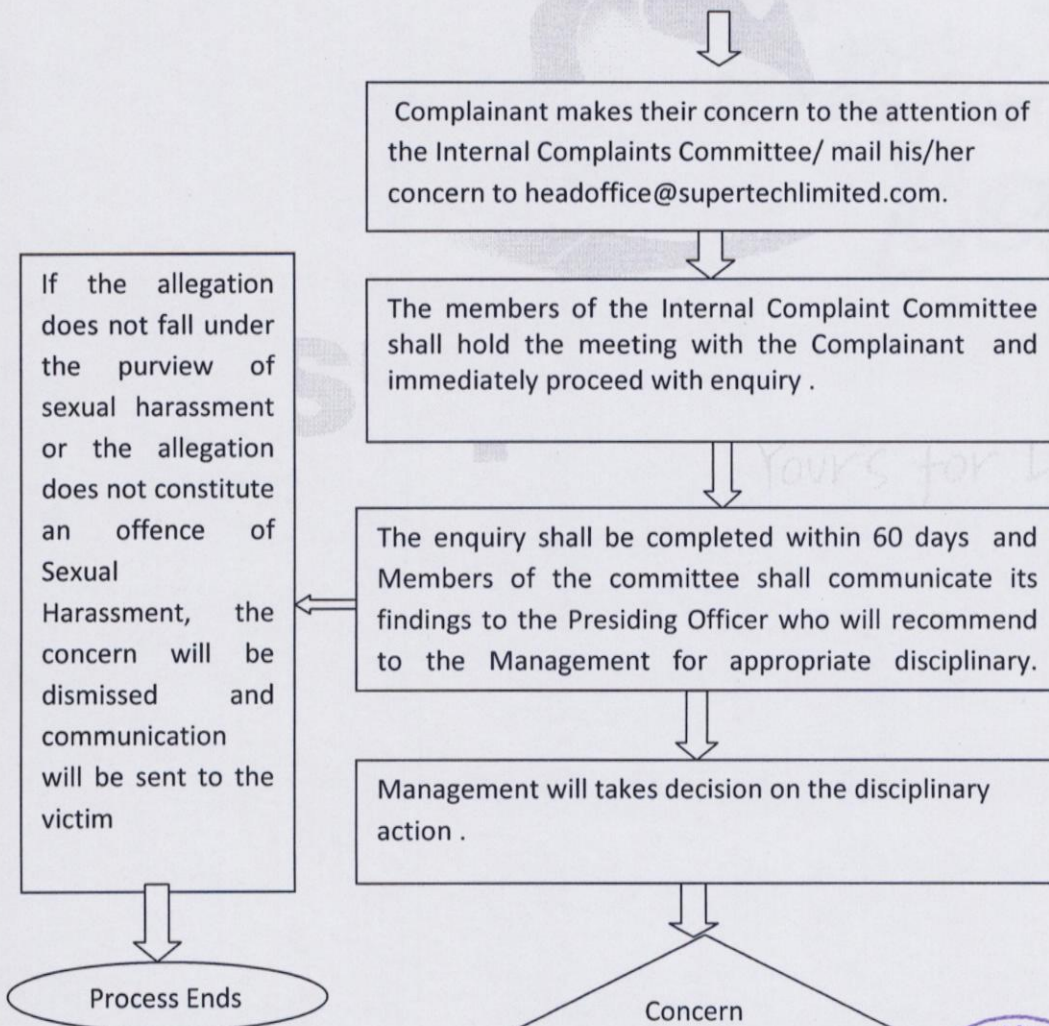
XI. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

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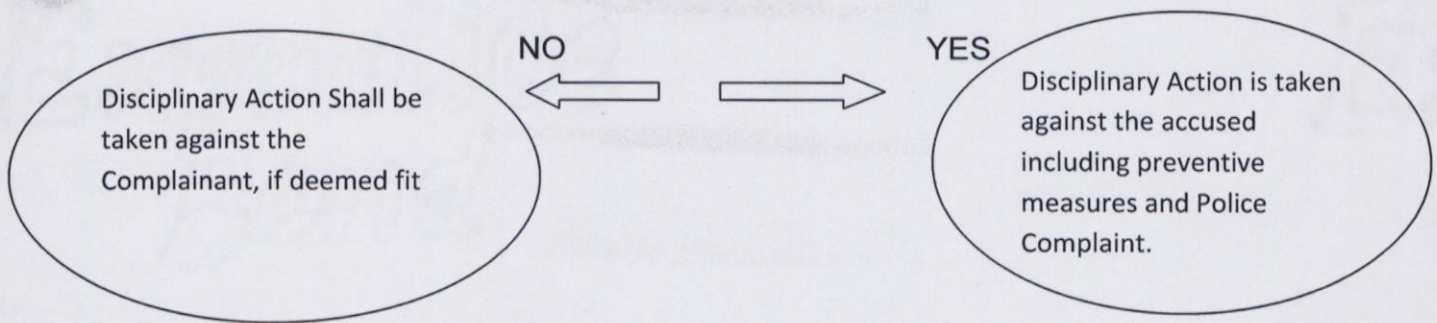


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