



ANTI HARASSMENT POLICY

SILVER CONSUMER ELECTRICALS PRIVATE LIMITED

CIN: U29100GJ2021PTC122633

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Anti Harassment Policy

SILVER CONSUMER ELECTRICALS PRIVATE LIMITED

INTRODUCTION

Silver Consumer Electricals Private Limited is one of the leading manufactures of pump sets as well as consumer products in India delivering superior and sustainable value to all our customers, business partners, shareholders, employee, workers and host community.

PURPOSE

Dignity of the individual is one of the core beliefs of Silver Consumer Electricals Private Limited (SCEPL). SCEPL believes in maintaining the dignity of every individual. SCEPL respects the ladies and sexual harassment policy is prepared to protect women from any mishaps. Sexual harassment is a criminal offence and punishable under relevant laws of the country.

BACKGROUND

As an organization we are committed to ensuring that the work environment at all our locations is conducive to fair, safe and harmonious relations between employees.

- a. Discrimination and harassment of any type is strictly prohibited.
- b. As a company, we have a good record of ensuring this culture as part of our existing human resource management and officer relation practices.
- c. We have also ensured that no officer is disadvantaged by way of gender discrimination.
- d. We would, however like to ensure that there is absolute clarity on the important and sensitive issue of sexual harassment.
- e. This note therefore annunciates the company's approach to the issue of sexual harassment and its policy for dealing with any incidence of the same.

SCOPE

This policy is applicable to all individuals who are employed in permanent, contract or temporary capacity at any business location of SCEPL.

DEFINITIONS OF ISSUE

A broad definition of sexual harassment consists of any physical or verbal 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 limited to, any of the following;

- a. Unwelcome sexual advances, request for sexual favors, and display of sexual visual, sexual audios, pornographic or obscene material and any other verbal or physical conduct of sexual nature.
- b. Transmitting any message by mail, telephone, e-mail, mobiles etc. which is obscene, lewd, suggestive or blatantly sexual in nature.
- c. Any explicit or implicit communications wherein sexual favor or demand, whether by words or actions are made a condition for an individual's employment, career progress, promotion etc. thereby creating a hostile environment.
- d. Sexually charged jokes or remarks and behavior which have sexually oriented innuendo.
- e. Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings.
- f. Any pervasive pattern of behavior which makes employees uncomfortable, insecure or feels humiliated or disadvantaged on the basis of gender differentiation.
- g. Actual sexual assault

Please note: This is an indicative but not an exhaustive list of possible forms of sexual harassment.

COMPANY'S POLICY ON SEXUAL HARASSMENT

- a. The company's policy is to totally prohibit any form of sexual harassment in the way the employees behave with each other.
- b. This applies equally to relations between superior and subordinates as well as between peers.
- c. Any incident of sexual harassment will be viewed very seriously.

- d. A complaint or report of sexual harassment will be immediately investigated and appropriate action will be taken against the offending employee/s.
- e. Such action will depend on the nature and seriousness of the offence and will include strict disciplinary action including termination of services.

CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

In accordance with requirement of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) and the Companies Act, 2013, Company has constituted the Internal Complaints Committee (herein after referred as a "committee") in respect of Sexual Harassment having following members;

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|--------------------------|-------------|
| 1. Mrs. Krishna Koladiya | Chairperson |
| 2. Mr. Vinit Bediya | Member |
| 3. Mrs. Ekta Paghdar | Member |

COMPLAINT HANDLING PROCESS

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

- a. Any officer/employee who experiences sexual harassment can get in touch with any member of the POSH (Prevention of Sexual Harassment) committee. Alternatively, the affected employee may approach any senior officer and senior officer will be expected to inform a member of the Committee immediately. All such complaints shall be in writing with full details of the incident.
- b. On receipt of such a complaint, the committee will immediately arrange to fully investigate all relevant details of the matter. It will do so with the possible care, sensitivity and discretion in protecting the sensibilities of the effected employee. The employee/s, who has allegedly committed the offence, would be given all reasonable opportunity to be heard by the committee.
- c. The result of this investigation will be formally recorded and communicated to the Managing Director along with a recommendation for appropriate action.
- d. The committee will normally complete this process and make its formal recommendation within 21 days after receiving the complaint unless there are exceptional circumstances.

- e. During the investigation period, the alleged should not directly/indirectly contact the complainant to influence her to withdraw the complaint, or destroy/modify the evidences.
- f. During the investigation period, depending upon the sensitivity of the complaint, the alleged can be put under suspension. Suspension period will be considered as no pay periods.
- g. Necessary actions will then be taken with regard to the offending employee/s based on the circumstances and seriousness of the offence.
- h. Where the company is legally advised that any such incident constitutes a criminal offence, the company will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action against the offending employee, either civil or criminal, the committee, on becoming aware of such action by the aggrieved officer, shall be entitled to, suo moto, start the internal enquiry/investigation and recommend appropriate actions.
- i. 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.
- j. In order to ensure that this matter is not trivialized, any complaint which in the opinion of the committee is blatantly false or frivolous or has been motivated to reasons that are clearly unconnected with the gender issue/sexual harassment, would be viewed very seriously by the company and appropriate action taken against such complainants.
- k. If the Committee receives an anonymous reference related to sexual harassment, it will draw the attention of the senior officers concerned with the relevant business or locations. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee,
- l. Heads of Department and senior officers of the company 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 incidence, they will immediately inform the head of the Committee and take appropriate action as advised.

Any deviations from this procedure shall require the approval of the Managing Director.

REVIEW PERIODICITY AND AMENDMENT

This policy may be revised/modified/amended by Board of Directors at such intervals as it may deem fit.

CONTACT

For queries related to the this Anti Harassment Policy, please write to us at: cs@silverpumps.com
