



ANTI SEXUAL HARASSMENT POLICY

BY: JSB&PARTNERS

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Hilton Metal Forging Limited has zero tolerance policy towards sexual harassment of any sort and in any form.

The provisions of this policy are governed by '*The Sexual Harassment of Women at Workplace (prevention, Prohibition and Redressal) Act, 2013*'

Sexual Harassment

It is a form of sexual discrimination that is prohibited by the law of the land. It includes, but is not limited to, unwelcome sexual advances, requests or demand for sexual favors and other verbal, physical, or visual conduct of a sexual nature which is offensive or objectionable to the recipient (e.g., abusive, derogatory, suggestive comments, slurs or gestures or other sexually-oriented personal remarks, physical contact, displaying sexually-oriented material, showing pornography, engaging in correspondence or other written communications of a sexual nature, or furnishing gifts or other sexually-oriented items) or any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Sexual Harassment takes place when –

- it subjects another to an unwelcome act of intimacy like, grabbing, brushing, touching, pinching etc;
- any unwelcome request/demand (directly or indirectly) for sexual favors is made to another with the condition of promotion, incentive, inducement etc;
- any unwelcome remarks of sexual connotation is made.

The following circumstances amongst other circumstances, if it occurs or is present in relation to or connected with any abovementioned acts also constitutes sexual harassment:

- implied or explicit promise of preferential treatment in female employee`s employment;
- implied or explicit threat about female employee`s present or future employment status;
- interference with female employee`s work or creating an intimidating or offensive or hostile work environment for her;
- Humiliating treatment likely to affect her health or safety.

Internal Complaints Committee (ICC)

The ICC shall consist of the following members:

Sl. No .	Post of Committee Members	Employee Name	Designation	Mobile Number	E-mail ID
1	Presiding Officer	Diksha Malhotra	Director	9819969638	yashika@hiltonmetal.com
2	Member	Yashika Malhotra	CFO	9619667638	yashika@hiltonmetal.com
3	Member	Yuvraj Malhotra	Managing Director	9820147638	yuvraj@hiltonmetal.com
4	External Member	Gaurangi Patil	Advocate	9969137418	gaurangi.patil@gpa ndassociates.in

Complaint Raising Process

All employees are expected to use this forum judiciously. Below are some guidelines for raising complaint with the ICC.

- The employee is encouraged to escalate the issue pertaining to Sexual harassment directly to the ICC.
- Complaints must be lodged, in writing, preferably within within 90 days from the occurrence of the event. Anonymous complaints will not be encouraged.

All members of ICC will meet the complainant latest within 15 days of receipt of the complaint. They will inform the complainant of this meeting date at the earliest.

- At this first meeting the complainant will be heard and her statements shall be noted. The complainant will be asked to produce any corroborative material that can substantiate the complaint, if available. In case of sexual harassment complaint, the ICC shall take steps to settle the matter between the complainant and the accused through conciliation. Provided NO MONETARY SETTLEMENT shall be made the basis of settlement.
- Thereafter, the person accused of the alleged harassment will be called for a meeting with the committee apprising him of the fact that a complaint has been lodged against him. During the meeting the accused will be given the opportunity to provide his view of the situation.
- After having heard both the parties, the committee will conduct an enquiry into the evidence provided by both the parties. The enquiry may include meetings with witnesses, consultation with experts and any other activities required to establish a balanced view of the case.
- Minutes would be maintained for all ICC Meetings.
- All complaints would be closed within 30 days of the report being raised. This timeframe would be followed unless a situation requires more time to conclude. In such an eventuality, the employee will be informed on record of the revised date for the disposal of the complaint.
- The ICC team shall direct the respective HR team to take action in accordance with the recommendations proposed by it.
- HR would maintain a report of all such complaints raised at different levels.

Key Timelines

Activity	Timeline
Complaints must be lodged, in writing, preferably	Preferably within 30 days from the occurrence of the event. Maximum time frame is 90 days.
Meeting with the Complainant by the Committee	Within 15 days of receipt of the complaint
Complaint Closure & ICC report published	Preferably within 30 days from the Complaint lodged date. Maximum timeframe is 90 days.
Any disciplinary action to be initiated by HR on the recommendations of the ICC	Preferably within 7 working days of the receipt of the EHRC report. Maximum timeframe is 60 days.

For the purpose of making an enquiry, in a sexual harassment matter, the ICC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908, namely-

- **summoning and enforcing the attendance of any person and examining him on oath;**
- **requiring the production of documents;**

Police Complaints

- In case the ICC finds the degree of offence coverable/ cognizable under the Indian Penal Code, 1908, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a police complaint.

Interim Reliefs

- During the pendency of the inquiry, the aggrieved employee can request in writing for transfer to the other workplace or grant leaves to the aggrieved woman up to a maximum period of 3 months. These leaves will be over & above the regular statutory/ contractual leave entitlement

