

# WANBURY LIMITED

**CIN: L51900MH1988PLC048455**

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## POLICY ON PREVENTION OF SEXUAL HARASSMENT

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**Objective:** Wanbury Limited (hereinafter referred to as “Wanbury” or “the Company”) is an equal employment opportunity Company and is committed to creating a healthy and safe working environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all Employees of the Company have the right to be treated with dignity.

### Scope of this policy -

The scope of this policy includes:

- To ascertain that any discrimination, harassment or gender discrimination of any type are strictly prohibited
- To ensure any behavior that degrades, harasses or unlawfully discriminates against any employee, client, vendor, contractor or employee of a temporary agency will not be tolerated.
- To maintain compliance with laws rules and regulations governing workplace harassment.
- Defines all discriminatory or harassing behaviors, with definitions, guidelines, and examples to help you identify and avoid offensive comments and actions

Wanbury prohibits sexual or any other kind of harassment of employees by any person in the work place or while conducting the Company’s business. It will not tolerate, condone or allow sexual harassment, whether engaged in by fellow Employees, supervisors, associates, clients or other non-Employees who conduct business with Wanbury (the Company).

Hence, sexual harassment at the work place or other than work place involving employees of Wanbury is a grave offence and is, therefore, punishable including termination from services.

This policy is in line with directive issued by The Supreme Court of India to all corporates to provide safe working environment for all genders and to provide forum for redressal of grievances related to sexual harassment.

### Applicability:

This Policy extends to all Employees of the Company whether employed directly or indirectly and is deemed to be incorporated in the service conditions of all Employees and comes into effect immediately.

Employee” means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants irrespective of salary earned and nature of contract.

Workplace for the purpose of policy does not only mean the four walls of the office the employee works in but also, all places visited by employees during the course of employment or for reasons arising out of employment including transportation provided by the employer for the purpose of commuting to and from the place of employment.

#### **A. Sexual Harassment**

1. Sexual harassment would mean and include without limiting any of the following:
  - i. unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, displaying sexually suggestive jokes, letters, phone calls, e-mail, online chat, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of sexually suggestive pictures, signs, verbal or non-verbal communication which offends the individual’s sensibilities and affects her / his performance;
  - ii. eve-teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy; unwelcome gesture by an Employee having sexual overtones
  - iii. unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, increment, transfer, examination or evaluation of a person towards any company activity;
  - iv. act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex; can include act to compel employee to work in isolation either at workplace or outside using work as a pretext.
  - v. conduct of such an act at work place or outside in relation to an Employee of Wanbury, or vice versa during the course of employment;

Any such act as listed above or an act that may not be listed above but results in similar harassment must be avoided at all times.

2. The victim of sexual harassment is not just the Employee who is the target of the harassment; other Employees who observe or learn about the sexual harassment may also be the victims and can institute a complaint. Anyone who is affected by the conduct can complain of sexual harassment.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider incidental to or connected with company’s official work, Wanbury shall take all steps necessary and reasonable to assist the affected Wanbury employee in terms of support and preventive action.
4. Where sexual harassment occurs as a result of an act or omission by employee towards any member of the third party or outsider incidental to or connected with Company’s Official work, this shall be construed as grave misconduct by the employee and strict disciplinary action shall be initiated.

5. In the case of third party harassment / outsider harassment, the Company shall initiate action by making a complaint with the appropriate authority with the consent of the Complainant.
6. Should an act of harassment occur in violation of this policy, it will be considered solely as an act of the offending employee and not as an act by or on behalf of Wanbury.

#### **B. Complaint Redressal**

1. The Management has constituted an Internal Complaints Committee ( referred hereinafter as "Committee" ) for redressal of any complaints related to sexual harassment consisting of a presiding officer and members across all establishments refer Annexure. Certified counselor is also included in the list so as to ensure that process is handled in fair and just manner.
2. Names and the Contact Details of the Committee Members are mentioned in the Annexure to this policy and shall also be notified through emails / notice boards / intranet.
3. Any Employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with her / his signature within ten (10) days of occurrence of incident. Alternatively complaint may be lodged through email, to any Committee Member. In case, complainant is not comfortable in giving complaint in writing, Committee member can also record her / his statement in presence of a witness and shall take signature of the witness and the complainant.
4. Committee shall maintain a register to endorse the complaint received by it and keep the contents confidential, except to use the same for discreet investigation or for any other purpose as may be required under Law.
5. Committee Member(s) shall meet with the Complainant within FIVE (05) working days of the receipt of the complaint, but not later than Seven (07) working days in any case.
6. The Complainant can also submit any corroborative material with a documentary proof, oral or written etc., to substantiate her / his complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady Employees involved and a male officer for male Employees, involved shall meet and record the statement.
7. The Committee shall in due course proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made
8. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to give an explanation ( written or oral) within seven (07) days of receipt of the same after which an "Enquiry" shall be conducted and concluded.
9. If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.

10. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call. All individuals who shall participate in this investigation under this policy would be protected from retaliation. The Committee shall call upon all witnesses mentioned by both the parties.
11. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
12. The Committee shall complete the "Enquiry" within reasonable period but not beyond three (03) months and communicate its findings and its recommendations for action to the Director -HR. The report of the committee shall be treated as an enquiry report on the basis of which an erring Employee can be awarded appropriate punishment straightaway.
13. During the pendency of enquiry the company may transfer the aggrieved party or the person against whom the complaint has been made to any other workplace or to a different role / team.
14. After doing the adequate consultation with the Committee and Management, Director HR shall decide the appropriate disciplinary action and ensures its implementation within reasonable period but not beyond 2 (02) months of the receipt of the recommendation. Notwithstanding this as final, the disciplinary action can include – written apology, withholding of pay/ increments, demotion, termination of employment, deduction of salary or way to be paid to the aggrieved person
15. In case if the complainant wants to file appeal against the recommendations of the committee, then the same shall be done within three (03) months from the date of recommendation.
16. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
17. In case the complaint is found to be false, the Complainant shall, be liable for appropriate disciplinary action.
18. The Employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.
19. Considering the sensitivity of the subject, the entire process shall be treated with utmost care and confidence which may include without limiting, the disclosure of the name of the victim, the type of harassment, witnesses, evidence and any other thing related thereto.
20. The Committee shall analyse and put up report on all complaints of this nature at the end of the every quarter for submission to Director - HR.
21. The Committee shall be governed by the guidelines laid down by the Supreme Court or any other legislation enacted / amended later on.

22. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management after taking legal advice and accordingly, file a Police Complaint.
23. Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

### **C. Complaints made with a malicious intent**

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, Wanbury Employees have a forum in the form of Committee to approach in the event of instances of sexual harassment.

However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his / her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

The Employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

### **D. Employee Feedback and Suggestions**

Employees are encouraged to share their feedback and suggestions to any of the Committee Members to help prevent harassment of any kind and take appropriate action.

Any Employee who feels that she / he has been victimized in the Company before the release of this policy can also share such incidence(s) with the Committee Member(s) to seek proper counseling and guidance.

### **E. Amendments to the Policy**

On the basis of their experience of the working of the policy, the Committee will have the power to make recommendations to the Management about changes in the policy.

Director HR of the company after adequate consultation with all members of the committee and Management shall make changes in the policy, as and when required in keeping with the objectives of the policy.

### **F. Policy Implementation Date – 1<sup>st</sup> January 2015**

The Policy becomes effective with effect from 1<sup>st</sup> January, 2015.

**ANNEXURE TO THE POLICY ON PREVENTION OF SEXUAL HARASSMENT MADE APPLICABLE AS ON 1<sup>ST</sup> JANUARY 2015:**

**A. Internal Complaints Committee for Head Office & Field Based Employees -**

Sr. No.	Name	Role	Location	Email	Direct Number
1	Ms. Bharti Gawade	Presiding Officer	Vashi	bhartig@wanbury.com	022-67942207
2	Mrs. Vaishali Lotlikar	Member	Vashi	vaishali.lotlikar@wanbury.com	022-67942119
3	Mrs. Dimple Jain	Member	Vashi	dimple.jain@wanbury.com	022-67942238
4	Mr. Harish Kumar Suvarna	Member	Vashi	harish.suvarna@wanbury.com	022-67942121
5	Ms. Nehal Sequeira	Counselor	-	nehalmystery@rediffmail.com	9820607918

**B. Internal Complaints Committee for R&D Center, Govandi -**

Sr. No.	Name	Role	Location	Email	Direct Number
1	Ms. Priscilla Fernandes	Presiding Officer	Vashi	priscilla@wanbury.com	022-67942152
2	Mr. Naresh Harisinghani	Member	Govandi	naresh@wanbury.com	022-61532031
3	Ms. Nisha Thorat	Member	Govandi	nisha.thorat@wanbury.com	022-61532019
4	Ms. Nehal Sequeira	Counselor	-	nehalmystery@rediffmail.com	9820607918

**C. Internal Complaints Committee for R&D, Mahape -**

Sr. No.	Name	Role	Location	Email	Direct Number
1	Ms. Priscilla Fernandes	Presiding Officer	Vashi	priscilla@wanbury.com	022-67942152
2	Dr. Nitin Pradhan	Member	Mahape	nitin.pradhan@wanbury.com	022-64570540
3	Dr. Pravin Shejul	Member	Mahape	pravin.shejul@wanbury.com	022-64570542
4	Ms. Nehal Sequeira	Counselor	-	nehalmystery@rediffmail.com	9820607918

**D. Internal Complaint Committee for Patalganga Plant -**

<b>Sr. No.</b>	<b>Name</b>	<b>Role</b>	<b>Location</b>	<b>Email</b>	<b>Direct Number</b>
1	Ms. Priscilla Fernandes	Presiding Officer	Vashi	priscilla@wanbury.com	022-67942152
2	Mr. J Raghunandan	Member	Patalganga	j.raghunandhan@wanbury.com	02192-660237
3	Mr. Sanjay Telange	Member	Patalganga	sanjay.telange@wanbury.com	02192-660223
4	Ms. Nehal Sequeira	Counselor	-	nehalmystery@rediffmail.com	9820607918

**E. Internal Complaint Committee for Tarapur Plant -**

<b>Sr. No.</b>	<b>Name</b>	<b>Role</b>	<b>Location</b>	<b>Email</b>	<b>Direct Number</b>
1	Ms. Priscilla Fernandes	Presiding Officer	Vashi	priscilla@wanbury.com	022-67942152
2	Mr. J Raghunandhan	Member	Tarapur	j.raghunandhan@wanbury.com	02525-605035
3	Mr. Sanjay Telange	Member	Patalganga	sanjay.telange@wanbury.com	02192-660223
4	Ms. Nehal Sequeira	Counselor	-	nehalmystery@rediffmail.com	9820607918

**F. Internal Complaint Committee for Tanuku Plant -**

<b>Sr. No.</b>	<b>Name</b>	<b>Role</b>	<b>Location</b>	<b>Email</b>	<b>Direct Number</b>
1	Ms. Priscilla Fernandes	Presiding Officer	Vashi	priscilla@wanbury.com	022-67942152
2	Mr. Thamrai Selvan	Member	Tanuku	thamrai.selvan@wanbury.com	08819284249
3	Mr. Venkateswararao Toleti	Member	Tanuku	venkateswararao.toleti@wanbury.com	08819284249
4	Ms. G Madhavi	Member	Tanuku	g.madhavi@wanbury.com	08819284249
5	Ms. Nehal Sequeira	Counselor	-	nehalmystery@rediffmail.com	9820607918

Sd/-

**Jitendra J Gandhi**  
**Company Secretary**