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PREVENTION OF SEXUAL HARASSMENT POLICY

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Amendments:

Sr. No.	Meeting of Board Meeting
1 st Amendment	Tuesday, May 27, 2014
2 nd Amendment	Saturday, February 10, 2024

1. Introduction

Metroglobal Limited is an equal employment opportunity company and is committed to creating a healthy working environment that enables 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. Sexual harassment at the workplace or other than work if involving employees is a grave offense and is, therefore, punishable

Metroglobal's quest for competitive excellence consists of our commitment to lawful and ethical conduct and adhering to Metroglobal's values. Integrity, honesty and respect for people remain some of our core values.

The company is committed to provide a safe and conducive work environment to its employees and expects them to combine "Expertise with responsibility". Towards this it is essential that each employee deals with their colleagues and third parties with full fairness and respect and realize that his / her behavior will be attributed to the company and can affect its inward and outward reputation.

Under the corporate compliance, harassment of any kind including sexual harassment is forbidden. Every employee has the right to be protected against harassment, regardless of whether the accused considers his or her own behavior to be normal or acceptable and of whether the harassed person has the opportunity to avoid the harassment.

Metroglobal is committed to provide a work environment free of sexual harassment. Sexual harassment is a form of workplace harassment of a sexual nature that affects the dignity of men and women at work.

The Metroglobal Sexual Harassment Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment and to comply the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder being The Sexual Harassment of Women at Workplace (hereinafter referred to as "Act").

2. Applicability

This policy applies to all the employees, workers and trainees (whether in the office premises or outside while on assignment) of the Metroglobal.

Where sexual harassment occurs to Metroglobal employee as a result of an act by a third party or outsider while on official duty, Metroglobal will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

3. What is Sexual Harassment?

The term Sexual Harassment is defined in Section 2(n) of the 'Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' as any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

- a) Physical contact or advances; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or nonverbal conduct of sexual nature;

Section 3 (2) states that the following circumstances among other circumstances if it occurs or is present about any act or behavior of sexual harassment may amount to sexual harassment:

- a) Implied or explicit promise of preferential treatment in her employment; or
- b) Implied or explicit threat of detrimental treatment in her employment; or
- c) Implied or explicit threat about present or future employment; or
- d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- e) Humiliating treatment likely to affect her health or safety.

A simpler understanding of the term 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:

- a) 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;
- b) Transmitting any message, by mail, telephone, e-mail, etc. which is obscene, lewd, suggestive or blatantly sexual;
- c) 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;
- d) Sexually charged jokes or remarks and behavior which have sexually-oriented innuendoes;
- e) A 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 feel humiliated or disadvantaged based on gender differentiation;
- g) Actual sexual assault;
- h) As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

This policy is to prohibit and deter any employee / staff employed with the Company any form advancing any form of sexual harassment in the way employees behave with each other. This

applies equally to relations between superiors and subordinates as well as between peers. Any incident of sexual harassment will be viewed with extreme seriousness. A complaint or report of sexual harassment will be immediately investigated and appropriate action will be taken against the offending employee or employees. For every incident of Sexual Harassment, the accused / respondent shall be prosecuted under the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as 'the Act') and such other laws enforced in India at the time of the commission of the offense.

4. If you are being harassed

- (a) Tell the accused that his / her behavior is unwelcome and ask him / her to stop.
- (b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- (c) File a complaint as soon as possible. If, after asking the accused to stop his/her behavior, the harassment continues, report the abuse to the Internal Complaints Committee ('ICC') formed for this purpose.

5. Internal Complaints Committee (ICC)

The Company hereby constitutes an Internal Complaints Committee (from now on referred to as 'Committee') as required under section 4 of the Act. The Committee has been established to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously;

1) Internal Complaints Committee for Sexual Harassment comprises of :

- a) Presiding Officer: A woman employed at a senior level in the organization or workplace
- b) At least 2 members from amongst employees, committed to the cause of women and or having the legal knowledge.
- c) One external member, familiar with the issues relating to sexual harassment;

2) At least one-half of the total members are women.

3) The committee shall be responsible for:

- a) Receiving complaints of sexual harassment at the workplace
- b) Initiating and conducting an inquiry as per the established procedure
- c) Submitting findings and recommendations of inquiries
- d) Coordinating with the employer in implementing appropriate action
- e) Maintaining strict confidentiality throughout the process as per established guidelines
- f) Submitting annual reports in the prescribed format

Internal Complaints Committee (ICC) Members:

Sr. No	Name of Member	Position in Committee
1	Mrs. Krati R. Jain	Presiding Officer
2	Mrs. Bijal Panchal	Member
3	Mrs. Ami Chokshi	Member
4	Mr. Rajkamal S. Jain	External Member

6. Dealing with the Complaint

- a) It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the ICC of any instance or behavior or sexual harassment by a co-worker towards another employee.
- b) The concerned employee shall give his complaint in writing to the Presiding Officer of the Committee giving details of the incident within a week of its occurrence.
- c) Once the complaint is received, it will be kept strictly confidential.
- d) The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.
- e) The Committee shall ensure that a fair and just investigation is undertaken immediately.
- f) Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- g) The ICC after receipt of the Complaints, conduct enquires, handle, deal with the complaints, call for written explanation, call upon and examine any / all witnesses mentioned by the complainant and accused, initiate corrective actions, resolve the disputes, lodge complaints with appropriate authorities and to initiate all action and to do all acts and things under the provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed there under read with Indian Penal Code, 1860, Code of Criminal Procedure 1973 and all other Acts / Rules / Regulations as may be applicable from time to time.
- h) The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of harassed as claimed the accused will be disciplined accordingly.
- i) The victim of sexual harassment has the option to seek transfer of the accused or his / her own transfer.

7. Disciplinary Action

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the Complainant.

8. Confidentiality

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

9. Protection Against Retaliation

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

10. Documentation

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's files with the full report of the Complaints Committee.

11. Dissemination of the Policy

A copy of this policy shall be circulated amongst all the employees of the Company. Further, a copy of the Policy would be uploaded in the website www.metrogloballimited.com.

12. 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, our employees have as forum 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.

13. Conclusion

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

Process Flow for Prevention of Sexual Harassment

