

TODAYS WRITING INSTRUMENTS LIMITED

Regd. Office: Survey No.251/2/2,Valsad Falia,

Nr Jain Temple, Dadra Nagar Haveli, 396230

(CIN: L74999DN1992PLC 000041)

E-Mail ID – secretarial@todays-pens.com Website: todays.co.in

Phone No: 91-22-66954900 Fax No.:91-22-66954910

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES

1.0 POLICY OBJECTIVE

1.1 TODAYS WRITING INSTRUMENTS LIMITED (TWIL) 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 work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

1.2 The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

2.0 SCOPE AND EFFECTIVE DATE

2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

2.2 Sexual harassment would mean and include any of the following:

- i) unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- ii) unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- iii) eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

- 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;
- v) conduct of such an act at work place or outside in relation to an Employee of TWIL, or vice versa during the course of employment; and
- vi) any unwelcome gesture by an employee having sexual overtones

2.3 Words or expressions not defined in this policy shall bear the same meaning as given under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or any amendments thereto.

3.0 COMPLAINT REDRESSAL COMMITTEE

3.1 Ms. Winnie Santwani and Ms. Jayshree Tulaskar were members of Complaint Redressal Committee and due to their resignation it has been decided to modify the composition of the Internal Complaints Committee (ICC) constituted to deal with complaints of Sexual Harassment of Working Women at Workplace. The Presiding Officer (Chairperson) and Members of the Committee are as follows:

Committee

- | | |
|--------------------------------|-------------|
| 1. Ms. Sarika Singh (Advocate) | Chairperson |
| 2. Mr. Navinazad Choudhary | Member |
| 3. Ms. Mamta Jalan | Member |
| 4. Ms. Reena Pandey | Member |
| 5. Mr. Sanjiv Roy | Member |

3.2 A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

4.0 REDRESSAL PROCESS

4.1 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 his/her signature within 10 days of occurrence of incident.

4.2 The Committee will maintain a register 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.

4.3 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but not later than a week in any case.

- 4.4 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her 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.
- 4.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/ her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 4.6 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.
- 4.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management. In the case of associates of the company the due process of law would be followed.

5.0 ENQUIRY PROCESS

- 5.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 5.2 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 submit a written explanation if she/he so desires within 7 days of receipt of the same.
- 5.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 5.4 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.
- 5.5 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.

- 5.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 5.7 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.
- 5.8 The Committee shall complete the “Enquiry” within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Executive Director (ED). 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 straight away.
- 5.9 The Executive Director (ED) will direct appropriate action in accordance with the recommendation proposed by the Committee.
- 5.10 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

6.0 OTHER POINTS TO BE CONSIDERED

- 6.1 The Committee may recommend to the Executive Director (ED) action which may include transfer or any of the other appropriate disciplinary action.
- 6.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, TWIL shall take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.
- 6.4 The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to Executive Director (ED).
- 6.5 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, by following the due process of law.

7.0 CONFIDENTIALITY

- 7.1 The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim’s interest in keeping the matter confidential.

7.2 To protect the interests of the 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.

8.0 ACCESS TO REPORTS AND DOCUMENTS

8.1 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.

9.0 RESPONSIBILITIES TO PREVENT SEXUAL HARASSMENT

9.1 All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

9.2 All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

10.0 MISCELLANEOUS

10.1 Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.

10.2 Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

10.3 The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:

- a. Number of complaints of sexual harassment received during the year;
- b. Number of complaints disposed off during the year;
- c. Number of cases pending for more than 90 days;
- d. Number of workshops or awareness program against sexual harassment carried out;
- e. Nature of action taken by the employer.

11. CONCLUSION

- 11.1 Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.
- 11.2 The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.
- 11.3 The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such other legal actions as may be available.