

NARSINGH ISPAT LIMITED	HR Policy Procedures	Document	Policy
		Issue Date	07.10.2025
		Effective Date	07.10.2025
		Version	1
Title: Policy on Sexual Harassment of women at workplace			

1. Background, Purpose & Objective:

- 1.1. NARSINGH ISPAT LIMITED is committed to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.
- 1.2. NARSINGH ISPAT LIMITED will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.
- 1.3. Sexual harassment at the workplace or other than workplace, if involving employees, is a grave and punishable offence.
- 1.4. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as “the Act”) enjoins upon employers to lay down guidelines / policies to prevent and provide redressal mechanism in the event of sexual harassment.
- 1.5. The following policy is accordingly laid down to prohibit, prevent or deter the commission of acts of sexual harassment of women at workplace and to provide the procedure for redressal of complaints pertaining to sexual harassment.

2. Scope & Coverage:

All employees of NARSINGH ISPAT LIMITED, including probationers, apprentices, trainees, consultants, advisors, associates of outsourcing agencies, employees of contractors, etc.

This policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3. Definition of “Sexual Harassment” & “Workplace”:

- 3.1. “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 individual’s sensibilities and affects 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;

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v) Any unwelcome gesture by an employee having sexual overtones.

3.2. "Workplace" would mean and include the following:

- i) All offices or other premises where the company's business is conducted
- ii) Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer.

4. Internal Complaints Committee (ICC):

All office premises or establishment having more than 10 employees shall be having Internal Complaints Committee for considering and redressing complaints of Sexual Harassment. Accordingly, the same has been constituted by the Company, applicable for all its office premises:

Sr. No.	Name of Member	Designation
1	Kavita Shaw	Presiding Officer
2	Aditya Pareek	Secretary
3	Ajay Kumar Singh	Member
4	Anup Kumar Sahoo	Member
5	Taranjeet Kaur	Member
6	Nandani Kumari	Member
7	Ananya Ghosh Chakraborty	External Member

It may be noted that at least one half of the total members so nominated shall be women. The Committee can subsequently be changed by the Board as and when there is any need. (E.g. change of members, increase in number of members, etc.).

Members appointed shall hold office for not more than 3 years at a time, which can be renewed.

ICC shall conduct their Internal Meetings for every quarter and as and when required for complaint proceedings and minute the same for the records.

5. Duties of Employer:

- i. To provide a safe working environment
- ii. Set up an Internal Complaint Committee (ICC)

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- iii. Display conspicuously at the workplace, the penal consequences of indulging in acts that may constitute sexual harassment and the composition of the ICC
- iv. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation programmes for the ICC members
- v. Provide necessary facilities, assistance and information to ICC for dealing with complaint and conducting inquiries
- vi. Employer is required to implement the recommendations of the ICC report and send a report of such implementation to the ICC and monitor the timely submission of reports by the ICC
- vii. To include information about all sexual harassment complaints and the disposal thereof in the Annual Report of the organization.

6. Annual Compliance

- i. The Internal Complaint Committee shall in each calendar year prepare an annual report and submit the same to the employer and the District Officer
- ii. The report shall include the no. of cases filed, if any, and their disposal under the Act.

7. Redressal Process:

- i) Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to Internal Complaints Committee (ICC) in writing with /her signature within 10 days and not more than (3) three months of occurrence of incident. The employee is required to submit 6 copies of complaint and disclose her name, department, division and location she is working in, to enable the ICC to contact her and take the matter forward
- ii) ICC may extend the time limit for submission of complaint, for reasons to be recorded in writing, if the circumstances exist which prevented the woman from filing a complaint within prescribed time
- iii) ICC shall render all reasonable assistance to the women for making the complaint in writing if she is not able to do so
- iv) The ICC will hold a meeting with the Complainant within five working days of the receipt of the complaint, but no later than seven working days in any case
- v) At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material etc., to substantiate her complaint
- vi) If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady member of ICC shall meet and record the statement. In any event, ICC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment or not.
- vii) Thereafter, ICC shall forward one copy of the complaint to the person against

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whom complaint is made within seven working days and may be called for a deposition before the ICC and an opportunity will be given to him to give an explanation, where after, an “Enquiry” shall be conducted and concluded

- viii) ICC before initiating an enquiry and at request of complainant may take steps to settle the matter through conciliation
- ix) 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
- x) In case the complaint is found to be false, the Complainant shall be liable for appropriate disciplinary action by the Management.

8. Enquiry Process:

- i) The ICC shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made
- ii) The ICC shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her opportunity to submit a written explanation if she / he so desires within 10 days of receipt of the same
- iii) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made
- iv) 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 ICC the names of witness/es that they propose to call. The ICC shall call upon all witnesses mentioned by both the parties
- v) The ICC 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
- vi) The ICC shall complete the “Enquiry” within reasonable period but not beyond ninety days and communicate its findings and its recommendations for action to Management. 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
- vii) For conducting an enquiry, minimum three members including Presiding Officer of ICC shall be present
- viii) NARSINGH ISPAT LIMITED’s Management will direct appropriate action in accordance with the recommendation proposed by the Committee within 60 days. The Head-HR will ensure corrective action on the recommendations of the ICC and keep the complainant informed of the same.

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9. General:

- Corrective action may include any or all of the following:
 - Formal apology
 - Counseling
 - Written warning to the perpetrator and a copy of it maintained in the employee's file
 - Change of work assignment / transfer for either the perpetrator or the victim
 - Suspension or termination of services of the employee found guilty of the offence withholding of increment / promotion / reward / incentive / bonus etc.

- Where sexual harassment occurs as a result of an act or omission by any third party or outsider, ICC shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

- The ICC shall analyze and put up report on all complaints of this nature at the end of the year for submission to the Management.

- In case, ICC finds the degree of offence coverable under the Indian Penal Code (IPC), then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management for making a Police Complaint. The ICC will have access to Legal opinion to refer to if necessary whether the offence is of a degree which falls under the provisions of the IPC

- ICC and complaint proceedings shall be governed by provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and rules framed thereunder and any amendments thereof.