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PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL  
HARASSMENT AT WORKPLACE POLICY

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PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT  
AT WORKPLACE POLICY

Usha Martin Limited (“Company”) is committed to providing a safe and secure working environment for all employees. The Board of Directors (“Board”) has adopted this Policy for Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (“Policy”) which sets out the guidelines and rules to prevent, deter and redress sexual harassment. This Policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and Rules framed thereunder (hereinafter “the Act”).

For the purpose of this Policy, the term “Workplace”, “Employee”, “Employer” and other words and phrases shall have the same meaning as defined in the Act.

The Human Resources (HR) team of the Company will monitor its effectiveness and review the implementation of the Policy.

1. Applicability

1.1 This Policy applies to all employees, directors, consultants, advisors, interns, trainees, contract workers, vendors, clients, service providers, and any other individuals associated with the company, irrespective of their role or tenure. The policy covers behaviour at all workplace locations, including office premises, virtual workspaces, work-related travel, off-site work locations, and social or professional gatherings organized by the company.

2. Sexual Harassment - Meaning and Examples

2.1 Sexual harassment is any unwelcome act or behavior of a sexual nature that violates a person’s dignity, creates an intimidating, hostile, or offensive environment, or interferes with their work or well-being. Sexual harassment may include physical contact or advances, demand or request for sexual favours, sexually coloured remarks, showing pornography, any other unwelcome verbal, non-verbal, or physical conduct of a sexual nature.

2.2 Sexual harassment may take many forms, including, but not limited to, the following:

2.2.1 Verbal conduct such as epithets, derogatory jokes or comments, bullying or intimidating speech, slurs or unwanted sexual advances, demand or request for sexual favours, invitations or comments, questions about a person’s sexual practices, gossiping about sexual relations, sexually coloured remarks, remarks about an individual’s body, colour, physical characteristics, or appearance, or any other unwelcome physical verbal or non-verbal conduct of sexual nature; or

2.2.2 visual conduct such as derogatory and/or sexually-oriented posters, pornography, offensive or obscene photography, cartoons, drawings or gestures, display of sexually suggestive or lewd objects, unwelcome notes or letters, and any other written or graphic material that denigrates or shows hostility or aversion toward an individual because of a protected characteristic, that is posted or sent via any form of electronic communication or placed on walls, bulletin boards, or elsewhere on the Company’s premises or otherwise circulated in the workplace; or

2.2.3 physical conduct such as physical interference with normal work, assault, unwanted touching, blocking normal movement or unwelcome physical contact and advances, leering at a person’s body, or threatening, intimidating or hostile acts; or

2.2.4 pressure for sexual activity, including offering employment benefits in exchange

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- for sexual favors or denying employment benefits in response to a refusal to provide sexual favours, demand or request for sexual favours; or
- 2.2.5 any other conduct that shows hostility toward, disrespect for or degradation of an individual based on the individual's status.
- 2.3 A conduct may also be considered harassment if the following circumstances, inter alia, occur in relation to or connected with any act or behavior of sexual harassment:
- 2.3.1 implied or explicit promise of preferential treatment in employment; or
- 2.3.2 implicit or explicit threat of detrimental treatment in employment; or
- 2.3.3 implied or explicit threat about present or future employment status; or
- 2.3.4 interference with work or creating an intimidating or offensive or hostile work environment; or
- 2.3.5 Humiliating treatment likely to affect any employee's health or safety.
3. Prohibition of Sexual Harassment at the Workplace
- 3.1 No employee shall be subjected to sexual harassment at the Company's workplace. Sexual harassment, whether overt or subtle, quid pro quo or environmentally hostile, is strictly prohibited by both the law and Company policy.
- 3.2 Harassing conduct is prohibited regardless of whether it is welcome or unwelcome, and regardless of whether the individuals involved are of the same or different sex, sexual orientation, or other status.
- 3.3 Individuals engaged in behavior that is found to be sexual harassment can be held personally liable for such conduct.
4. Internal Committee
- 4.1 The Company has formed an Internal Committee ("IC") to investigate any allegations of sexual harassment at the workplace. The Composition of IC is in accordance with the Act.
- 4.2 The composition of IC is given in Annexure-II to this policy. Any subsequent change in Annexure-II to this Policy, shall be approved jointly by one director and company secretary, and such modified Annexure-II shall be deemed to be part & parcel of this Policy.
- 4.3 The members of the IC shall be subjected to change from time to time as on when required. The vacancy if created or any Casual Vacancy shall be filled by fresh nomination in accordance with the provisions of law.
5. Reporting Obligation
- 5.1 It is the obligation of each employee to report an incident of sexual harassment at the workplace.
- 5.2 The report should be provided in writing to the IC's Presiding Officer or any other member of the IC.
- 5.3 All employees and directors of the Company are encouraged to raise concerns and make reports without fear of reprisal or victimisation.
- 5.4 Any employee or director who becomes aware of incidents of sexual harassment should promptly advise the IC's Presiding Officer or any other member of the IC.
- 5.5 100% of Internal Committee (IC) members shall undergo training annually.
6. IC's Duties and Obligations
- 6.1 The IC shall, inter alia,
- 6.1.1 hear, receive and record complaints pertaining to sexual harassment;
- 6.1.2 settle the matter through conciliation, at the request of the complainant, or inquire and investigate into the matter following the due process of law;

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- 6.1.3 record the settlement, if any, and document the inquiry proceedings and findings and prepare the inquiry report;
- 6.1.4 submit the inquiry report to the Company within 10 days from the date of completion of the inquiry;
- 6.1.5 identify and acknowledge situations where complaints have been made falsely or maliciously and communicate the same to the Company;
- 6.1.6 to take action against the false, forged misleading evidence submitted by the witness;
- 6.1.7 prepare and submit, in each calendar year, an annual report, in the manner prescribed under the Act, and submit the same to the Company and the District Officer appointed under the statute, maintain confidentiality with respect to the identity of the complainant and the nature of the complaint. The Annual Report shall be as prescribed in Section 21 of the Act; and
- 6.1.8 ensure compliance with the provisions of the Act.

## 7. Interim Reliefs

- 7.1 During the period of inquiry or investigation, the complainant or Aggrieved Persons, may request the IC in writing for:
  - 7.1.1 Transfer of Aggrieved person or the respondent to any other workplace,
  - 7.1.2 Grant of leave up to a period of 3 months in addition to the leave otherwise entitled to, or
  - 7.1.3 Restraint the respondent from reporting on the work performance of the aggrieved woman on writing her confidential report, and assign the same to another officer.
  - 7.1.4 Grant such other relief as required.
- 7.2 The Company shall implement the recommendations of the IC in this respect and send the report of the implementation to the IC.

## 8. Conciliation

- 8.1 The employee, who believes that he or she is victim of sexual harassment, may request the IC, before the IC initiates an inquiry, to settle the matter between such employee and the respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- 8.2 The IC shall record the settlement so arrived and forward the same to the Company with the Copies of settlement to both the parties.
- 8.3 In the event a settlement has been reached, further inquiry shall not be conducted by the IC. Employees are expected to report to the IC in case any terms of the settlement have not been complied with by the defendant, in which case the IC shall proceed with the inquiry.

## 9. Inquiry / Investigation of Claims of Sexual Harassment at the Workplace

- 9.1 All claims of harassment will be promptly and thoroughly investigated.
- 9.2 Any employee who believes that he or she is a victim of sexual harassment at the workplace should report or complain in writing to the IC as soon as possible, not later than three months from the date of occurrence of the incident amounting to sexual harassment (in case of a series of incidents, within a period of 3 (three) months from the date of the last incident). The complainant is required to submit 6 (six) copies of the complaint along with supporting document and the names and addresses of the witnesses. The Company reserves the right to extend the period for making the complaint, if the Company is satisfied that the circumstances were such which prevented the employee from filing a complaint within 3 (three) months.
- 9.3 All reasonable assistance shall be provided by the Company to the employee for making the complaint in writing. The complaint can also be made by the legal heir (in case of death of the employee) or any other person authorized in case the employee is under any physical or mental incapacity. The complaint should be clear and should

- include details of the incident or incidents, names of the individuals involved and names of any witnesses.
- 9.4 On receipt of the complaint, the IC shall send one of the copies received from the complainant to the respondent within 7 (seven) working days. The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within 10 (ten) working days from the date of receipt of the documents from the IC.
- 9.5 The IC shall make inquiry into the complaint in accordance with the principles of natural justice. During the course of the inquiry, the IC shall give both parties an opportunity of being heard and a copy of the finding shall be made available to both parties, enabling them to make representations against the findings before the IC. The IC shall investigate the complaint, for which purpose it will meet as soon as is practicable upon receiving the complaint. The IC will have the powers to call any person and record their statements and make such investigation as may be necessary to evaluate the complaint. For the purposes of the inquiry, the IC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 of India when trying a suit in respect of the following matters:
- 9.5.1 summoning and enforcing the attendance of any person and examining him on oath, and
- 9.5.2 requiring the discovery and production of documents.
- 9.6 In the event there is a complaint by the respondent against the complainant, the IC may investigate these allegations as well.
- 9.7 The inquiry shall be completed by the IC within a period of 90 days. The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for 3 (three) consecutive hearings conveyed by the Presiding Officer. Provided however that such termination or ex parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.
- 9.8 The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
- 9.9 In conducting the inquiry, a minimum of 3 (three) members of the IC including the Presiding Officer shall be present.

## 10. Inquiry Report and Disciplinary Action Post Inquiry / Investigation

- 10.1 In the event the IC reasonably concludes based on the information presented that the complaint was not valid, or there is a specific complaint by the respondent against the complainant, it may investigate the allegations and charges through the mechanism of a departmental enquiry. In the event it is determined, upon investigation that the complaint is false or malicious, the employee making the false complaint may be subject to disciplinary action, up to and including termination of employment. It is hereby clarified that mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant.
- 10.2 Upon completion of the inquiry, the IC shall provide its report to the Company within 10 (ten) days and such report shall be made available to the concerned parties. If the IC determines that the complaint is true, it shall advise the management in writing on initiating disciplinary action. For all complaints referred to the IC, the report of the IC will be final and conclusive. The report of the IC shall be deemed to be the enquiry report for purposes of any disciplinary rules applicable to the employee against whom a complaint of sexual harassment was made.

## 11. Punishment

- 11.1 In case the IC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company to take any of the following action:
- 11.1.1 Written apology; and/or
- 11.1.2 Warning; and/or
- 11.1.3 Reprimand or censure; and/or

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- 11.1.4 Withholding of promotion; and/or
- 11.1.5 Withholding of pay rise or increments; and/or
- 11.1.6 Terminating the respondent from service; and/or
- 11.1.7 Undergoing a counselling session; and/or
- 11.1.8 Suspension from service for such period as the Company may deem appropriate;
- 11.1.9 To take action for sexual harassment as a misconduct in accordance with the provisions of the service rules or Company's policies applicable;
- 11.1.10 To deduct from the salary/ wages payable to the perpetrator, such sum as it may deem appropriate to be paid to the aggrieved employee or to his/her legal heirs.

The Company shall act upon the IC's recommendations within 60 (sixty) days of receipt of the report.

- 11.2 In order to determine the amount to be paid to the aggrieved employee, the IC shall take the following into consideration:
  - 11.2.1 the mental trauma, pain, suffering and emotional distress caused to the aggrieved employee;
  - 11.2.2 the loss in the career opportunity due to the incident of sexual harassment;
  - 11.2.3 medical expenses incurred by the victim for physical/ psychiatric treatment;
  - 11.2.4 the income and status of the respondent; and
  - 11.2.5 feasibility of such payment in lump sum or in instalments.
- 11.3 If requested by the aggrieved employee, the Company shall assist him/her in making a criminal complaint.
- 11.4 Where the IC arrives at the conclusion that the allegation against the respondent is malicious or the complainant has made the complaint knowing it to be false or the complainant or any other person has produced any forged or misleading document, it may recommend to the Company to take any of the above actions.

## 12. Right to appeal

Any person aggrieved from the recommendations of the IC has a right to appeal to the court or tribunal, within 90 (ninety) days from the date on which the IC issued its recommendations.

## 13. Confidentiality

- 13.1 Reports of alleged harassment and discrimination will be treated with confidentiality and respect. Those involved in investigating the matter may not disclose any information to any person not directly involved in resolving the allegations. The Company will advise or consult only with those who have a need to know about the allegations, including witnesses who may have knowledge of the circumstances surrounding the allegations and who may be interviewed as a part of the investigation. The details of specific disciplinary action taken will remain confidential between the Company and the employee receiving the discipline. Any other employees involved with the specific allegations will be notified when the report is resolved, and the investigation is concluded but will not be entitled to receive confidential details resulting from the investigation.
- 13.2 Notwithstanding the provisions contained in the Right to Information Act, 2005 of India, the contents of the complaint made to the IC by the complainant, the identity and addresses of the aggrieved employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC, action taken by the Company, etc. shall not, be published, communicated or made known to the public, press and media in any manner. However, information may be disseminated regarding the justice secured to any victim of sexual harassment under law without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved employee and witnesses.

- 13.3 Any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or actions under law, contravenes his/her confidentiality obligation, he/she shall be liable for penalty in accordance with the provisions of the service rules / Company policies, as applicable.
- 13.4 Any person that contravenes with such confidentiality obligation may be subjected by the Company to payment of a fine of up to Rs.25,000.

#### 14. Retaliation

- 14.1 The Company prohibits employees from taking negative action against any employee, former employee, job applicant, customer, member, supplier or person working on behalf of the Company for reporting conduct that may constitute sexual harassment as per this Policy; assisting another individual in reporting conduct that may violate this Policy or filing a complaint of sexual harassment with a government agency or court.

#### 15. Consequences under Criminal Laws

- 15.1 Any male who commits the following offences shall be punished with rigorous imprisonment for a term of up to three years, or with fine, or with both:
  - 15.1.1 physical contact and advances involving unwelcome and explicit sexual overtures;
  - 15.1.2 a demand or request for sexual favours; or
  - 15.1.3 showing pornography against the will of a woman
- 15.2 Any male who is guilty of making sexually coloured remarks against a female employee shall be punished with imprisonment of either description for a term of up to 1 (one) year, or with fine, or with both.

#### 16. Information and Reporting

- 16.1 Employees with questions or needing further guidance should contact the HR Manager.
- 16.2 The HR team will provide necessary facilities to the Internal Committee.
- 16.3 The HR team shall make available the Policy to all persons upon each updation, modification or amendment.
- 16.4 The Company shall make applicable disclosures in the Annual Report as prescribed under the Companies Act, 2013 and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

#### 17. Employers Duties:

- a) The Company shall organize workshops, orientation and awareness programs from time to time for sensitizing the employees with the provisions of the Act and orientation program seminars, conduct capacity building and skill building programmes for the members of the Internal Committee and assist in securing the attendance of respondent and witness or such information before the Internal Committee. Usha Martin aims to ensure that 100% of its employees are trained on POSH within six months of joining. The awareness sessions shall be continuously conducted through online, offline, and e-learning methods. Additionally, the Company will ensure that all stakeholders are aware of the POSH policy.
- b) carry out employee's awareness programmes and create forum for dialogues.
- c) declare the names and contact details of all the Members of the Internal Committee.
- d) display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee.
- e) provide necessary facilities to the Internal Committee, for dealing with the complaint and conducting an inquiry.



- f) assist in securing the attendance of respondent and witnesses before the Internal Committee.
- g) make available such information to the Internal Committee, as the case be, as it may require having regard to the complaint.
- h) provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
- i) treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.
- j) monitor the timely submission of reports by the Internal Committee.

#### 18. Amendment

Any amendment or waiver of any provision of this Policy must be approved by the Board of Directors of the Company. The Board shall review this policy at least once in every three years, Annexure II to this policy may be amended jointly by any one Director and Company Secretary of the Company.

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Annexure-I

The definitions of employee and employer under the Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 are provided below:

"Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

"Employer" means--

- (i) in relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify in this behalf;
- (ii) in any workplace not covered under sub-clause(i), any person responsible for the management, supervision and control of the workplace. Explanation - For the purpose of this sub-clause "management" includes the person or board or committee responsible for formulation and administration of policies for such organisation;
- (iii) in relation to workplace covered under sub-clauses (i) and (ii), the person discharging contractual obligations with respect to his or her employees;
- (iv) in relation to a dwelling place or house, a person or a household who employs or benefits from the employment of domestic worker, irrespective of the number, time period or type of such worker employed, or the nature of the employment or activities performed by the domestic worker.

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## USHA MARTIN LIMITED

PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE  
POLICYAnnexure II

The current composition of the IC in the Company's office at Kolkata is:

Presiding Officer:

Mrs. Sonali Sarkar

Other Members:

Mr. Partha Dutta

Ms. Monalisa Sasmal

Ms. Sanchaita Sengupta

Ms. Rituparna Saha Advocate, High Court, Kolkata (External Member)

The current composition of the IC in the Company's Plant at Ranchi is:

Presiding Officer:

Mrs. Sonali Sarkar

Other Members:

Mr. Partha Dutta

Ms. Maya Thakur

Ms. Rituparna Saha Advocate, High Court, Kolkata (External Member)

The current composition of the IC in the Company's office at Mumbai is:

Presiding Officer:

Mrs. Sonali Sarkar

Other Members:

Mr. Manish Prasad

Ms. Sneha Shaw

Ms. Rituparna Saha Advocate, High Court, Kolkata (External Member)

The current composition of the IC in the Company's office at Delhi is:

Presiding Officer:

Mrs. Sonali Sarkar

Other Members:

Mr. Debasis Dutta

Ms. Sneha Shaw

Ms. Rituparna Saha Advocate, High Court, Kolkata (External Member)



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The current composition of the IC in the Company's office at Chennai is:

Presiding Officer:

Mrs. Sonali Sarkar

Other Members:

Mr. P Partheeban

Ms. Lakshmi Kannan

Ms. Rituparna Saha Advocate, High Court, Kolkata (External Member)

The current composition of the IC in the Company's office at Hoshiarpur is:

Presiding Officer:

Mrs. Sonali Sarkar

Other Members:

Mr. Tarsem Lal

Ms. Maya Thakur

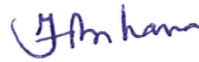
Ms. Rituparna Saha Advocate, High Court, Kolkata (External Member)

Approved by

Whole Time Director

Company Secretary

Signature:

A handwritten signature in blue ink, appearing to read "G. Anand".

Designation : Whole-time Director

Date : 31<sup>st</sup> March 2025

