

KINECO

WORLD OF COMPOSITES

Anti-Discrimination and Anti-Harassment Policy

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1. Introduction

Kineco Limited (KINECO) is committed to providing a work environment free of discrimination and/or harassment. KINECO prohibits discrimination/harassment in the workplace, whether committed by or against workers, staff, managers, senior management, vendors, contractors or visitors. KINECO believes in developing an environment that is respected and productive. Workplace discrimination or harassment based on the employee's race, color, religion, sex, national origin, citizenship, age status, sexual orientation, disability, marital status, or any other basis, prohibited by the Constitution of India and other law of the land in force, is not tolerated. KINECO prohibits inappropriate conduct based on any of the above characteristic at its facility.

2. Scope of the Policy

The policy is applicable to all employees (females and males) and also to third parties associated with KINECO. The third party with respect to KINECO would include the customers, vendors, visitors, trainees etc., who are associated to the organization. An Anti-Discrimination & Anti-Sexual Harassment Committee will be formed by the organization, which will undertake preventive action as well as it acts as a grievance redressal body where complaints of discrimination / sexual harassment at the work place will be contemplated.

3. Harassment/Discrimination

Harassment/Discrimination is behavior that is unwanted, unreasonable and offensive to the recipient, which creates an intimidating, hostile or humiliating work environment for the person. There are various types of harassment which can occur at work, these can be based on:

- Race, ethnic origin, nationality or skin color
- Gender and/or sexual orientation
- Religious or political convictions
- Disabilities, illness, sensory impairments or learning difficulties
- Age

This list is not exhaustive.

Harassment can occur between people of the same sex or opposite sex.

4. Sexual harassment

Sexual harassment is hereby defined as any conduct that is sexual in nature and unwelcome, imposed and unreciprocated by the recipient. This type of harassment is defined by its impact on the recipient and not the intent of the harasser. The impact may cause deep effect on the receiver of such harassment thus causing the work environment to become unfavorable.

The company prohibits inappropriate conduct that is sexual in nature at work at company premises which includes:

- Comments, jokes, or degrading language or behavior that is sexual in nature;
- Sexually suggestive objects, books, magazines, photographs, cartoons, pictures, electronic communications, or other material;
- Unwelcome sexual advances, requests for sexual favors, or any sexual touching;
- Offering favorable terms or conditions of employment or benefits in exchange for sexual favors or threatening or imposing less-favorable terms or condition of employment of sexual favors are refused;

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Sexual harassment is prohibited whether it's between members of the opposite sex or members of the same sex.

5. Information on appointment:

It will be made mandatory to include a feature in the existing KINECO HR Policy Manual on its Policy on Harassment/Discrimination and its scope at the workplace. Awareness training will be provided to the new appointee with regard to this policy. An annual Refresher Program on Anti-Discrimination & Anti-Sexual Harassment will also be conducted for all the members of the Company.

6. Management and staff responsibility

All managers have a key responsibility for establishing and maintaining a workplace free from personal discrimination/harassment. All managers are directly responsible for the conduct of their staff. All KINECO employees are expected to comply with this policy. It is the personal responsibility of each employee to ensure that inappropriate conduct does not occur.

7. Anti-Discrimination & Anti-Sexual Harassment Committee

KINECO will form an Anti-Discrimination & Anti-Sexual Harassment Committee (Committee) to deal with complaints of discrimination / sexual harassment at the workplace for employees and third parties. The committee will work in coordination with the management of KINECO and ensure regularity of meetings and follow-up of cases of discrimination and harassment that may arise. This body will also ensure preventive action to be taken to avoid discrimination and harassment at the work place.

The Committee shall comprise of 4 members and not less than half of its member should be women, and the Chairperson of the committee will be a woman. One member will be a representative of another organization, thus ensuring transparency in procedures, and delivery of justice. In case of differences of opinion in a case the decision of the majority of the committee members will prevail. Members will be selected based on their commitment and sensitivity to the issue. The Committee Members must be gender sensitive and compassionate individuals. They must be non-judgmental and tactful in their approach while handling such cases. Membership will be for a period of two years, after which a new set of members will be appointed. However, a few members, if willing, can continue their membership to help evolve and guide the new members. Membership will be terminated in the event of retirement or resignation of a member from his/her post in the organization, or if a member has been found guilty in a case of discrimination or sexual harassment. Meetings will be held once every quarter, whether or not a case of discrimination / sexual harassment has been registered. This is so as to discuss and plan for preventive actions and to make recommendations to the facilitating body. The venue and the time for the meetings will be as per the decision of the members of the committee.

The committee shall be responsible for preparing and submitting reports and returns to the competent authority from time to time.

The contact details of members of the Committee will be made available to all associates of KINECO. The role of members of the Committee will be to provide immediate support to victims of discrimination / sexual harassment to encourage them to place complaints with the Committee.

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8. Complaint Mechanism

A written application will be required to be given to the Committee, which will then be deliberated upon. The application must consist of all the details of the event/s of discrimination / sexual harassment that occurred, as well as the name of the alleged offender. Approximate date/time of the event/s could also help during investigation. Any complaints of discrimination or harassment will be treated with sensitivity and investigated promptly. Complete confidentiality will be maintained during the investigation. If any employee receives a complaint or observes or believes that they are victims of discrimination, sexual harassment or any other form of harassment at work, they should immediately report to the following:

- Members of the Committee
- Human Resources Department

Investigation must be carried out within a period of one month. The principal of natural justice will be adopted during investigation. Thus, both parties, the applicant as well as the alleged offender, will be given a platform to produce their respective views of the event/s and will be given a chance to explain their sides. Action to be taken will be recommended by the Committee, based on the findings from the investigative report. These will be reviewed by the management and appropriate disciplinary action will be taken to eliminate inappropriate behavior. Where such conduct amounts to misconduct in employment, appropriate disciplinary action will be initiated by the Management in accordance with Company's Rules. Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the Management shall initiate appropriate action in accordance with law by making a complaint with the appropriate authorities.

The Company prohibits any form of retaliation against the complainant for making a report of discriminations or harassment or participating in the investigation of a complaint of discrimination or harassment. If any complainant believes that they have been subjected to retaliation, they can approach the Committee for resolution of their grievances.

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