

Date: 09.07.2019

KIMPLAS PIPING SYSTEMS PRIVATE LIMITED (A NORMA Group Company)
POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

Introduction

This policy is framed in accordance with the provisions of "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013" and rules made thereunder (herein after referred to as 'the Act'). This Policy shall supersede earlier policy dated 30.01.2018 on Sexual Harassment of Women at Workplace. The meaning of the terms used in this Policy shall be as defined in the Act or any other law applicable, if that term not defined in the Act.

Responsibility

M/s. Kimplas Piping Systems Pvt Ltd (the company or Kimplas or KPSL) being a Norma Group Company is an equal opportunity employer and is committed to creating a healthy work environment that enables them to work without fear of prejudice, gender based and sexual harassment at work. It is the responsibility of the company and responsible persons at workplaces to prevent or deter the commission of acts of sexual harassments and to provide the procedures for the resolution, settlement or prosecution of acts, of sexual harassment by taking all steps as required. The company strongly believes that all its employees are to be treated with dignity. Sexual harassment at workplace or any other workplace that requires presence of its employees is zero tolerance, an offence and therefore Punishable.

Effective Date, Applicability & Scope of the Policy

This policy shall come into force with immediate effect and shall be applicable at workplaces across all locations of the company.




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The policy is applicable to all the employees, workmen and trainees (herein after referred as employees) whether in the office premises or outside while on official assignments anywhere and for all branch offices of the Company.

Definition of Sexual Harassment

Sexual harassment includes the following un welcome acts or behaviour (whether directly or by implications) outlined as under

- a) Physical contacts and advances
- b) A demand or request for sexual favours
- c) Sexually coloured remarks
- d) Showing pornography
- e) Any other un welcome physical, verbal or non verbal conduct of sexual nature

Complaints Committee & Redressal Mechansim.

Formation of Committee

The Internal Committee also termed as Internal Complaints Committee constituted under the policy as provided under Section 4 of the Act, shall consists of following members:

Sr.No	Name of the employee	Designation	Mail ID
1.	Ms. Sunita Sharma	Presiding Officer	Sunita.sharma@normagroup.com , Mob No. 9011018714
2.	Ms. Vineetha Nair	Employee Member	vineetha.nair@normagroup.com , Mob No. 7768067111
3.	Mr. Prashant Umbare	Member	prashant.umbare@normagroup.com , Mob No. 9970061932
4.	Advocate Kshama L. Sangmuly (Social Activist)	Member	sangmuly123@gmail.com , Mob No.9890156867



Redressal Mechanism

- a) In compliance with the act if the complainants warrants formal intervention, the complainant needs to lodge a written complaint which shall be followed by the redressal mechanism as described in the policy. It is the obligation of employees to report sexual harassment matters personally. A concerned co-worker may also put the complaint of any instance or behaviour of sexual harassment.
- b) All the complaints in writing shall be addressed to Chairperson of the committee giving details of the incident, name of witnesses, if any, and I or provide the material facts I proofs in support of the complaints within a week of its occurrence.
- c) Once a complaint is received it shall be kept and dealt with strictly confidential.
- d) The person accused shall be informed about the complaint that has been filed against him and no unfair acts of retaliation or un ethical action shall be tolerated.
- e) The committee shall ensure that a fair and just investigation is undertaken immediately upon receipt of such complaints.
- f) Both, the complainant and alleged accused initially will be questioned separately with a view to ascertain the facts and the veracity of their contentions. If required the person(s) who has been named as a witness will need to provide necessary information in resolutions of the matter.
- g) If the alleged accused is absent for three consecutive hearings without proper reasons, the committee may terminate the inquiry and give ex parte decision. However fifteen days written notice to be given to either of the party before termination or ex parte order.
- h) All the proceedings of the inquiry shall be documented. The complaints and the alleged accused shall be given full opportunity to respond and provide evidences, witnesses, material facts etc. including opportunity for cross examinations of the other party. The inquiry documents of each hearing shall be signed by all the committee members present during the inquiry proceedings.
- i) It is expected that the complainant and the accused shall be informed of the outcome of the investigation within three months from the receipt of the complaint.



- j) In the investigation, if it reveals that the complainant has been sexually harassed as claimed in the complaint, the accused will be disciplined within fifteen days from the receipt of the inquiry report. Disciplinary actions may include:-
- i. Transfer
 - ii. Apology to be tendered by accused.
 - iii. Warning letter
 - iv. Withholding of increments or promotions.
 - v. Suspensions
 - vi. Dismissal or
 - vii. Any other action as company deem fit or as provided under the Act.
- k) This action may be in addition to any legal recourse sought by the complainant or the company in accordance with law of the land.

Interim Relief

During the pendency of the inquiry on a written request made by complainant, the committee may recommend to the company to –

- i. Transfer of the complainant or the alleged accused to any other workplace
- ii. Grant special leave to the complainant for maximum fifteen days in addition to the leaves she would be entitled.
- iii. Prevent the alleged accused from assessing complainant's work performance, if superior.
- iv. Any other relief as deemed appropriate or as provided under the Act.

The company shall inform the committee regarding steps taken on the request made by the committee.

Confidentiality

All information received shall be kept strictly confidential. Any person, complainant or accused or witnesses or committee members who breaches confidentiality shall be subject to disciplinary action.

Protection Against Retaliation

Regardless of the outcome of the complaint made in good faith the complainant and any person providing information / material facts or any witness shall be protected from any form of



retaliation. While dealing with the complaints of sexual harassments, the Committee shall ensure that the complainant or witness are not victimised or discriminated.

However if on investigation if 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 / or to settle personal / professional scores, appropriate action may be taken against complainant.

Additional Measures for Complainant

The Complainant can, if required, may file her complaint directly to the Norma Group Compliance Organization through BKMS Whistleblowing System.

It can be assessed through NORMA Group's web site-

<https://www.normagroup.com/corp/en/cr-whistleblower-system/>

Then the Norma Group Compliance team shall deal with the matter in such manner as they deem fit for the best interest of the victim as well as the organization.

Awareness

This policy shall be notified to all the employees and also to be displayed at prominent locations at all work places of the company.

For Kimplas Piping Systems Limited



Atul Gambhir
Managing Director
DIN 05269345



Prashant Umbare
DGM (HR & ADMIN)



Place: - B-20, MIDC, Ambad, Nashik – 422010, Maharashtra, India