



**COMPANY MANAGEMENT SYSTEM**

SEAMEC/HRE/007  
Revision: 2  
Date: 13/12/18

**SEAMEC Document No :**

SEAMEC/HRE/007

**Document Title :**

**SEXUAL HARASSMENT**

**COMPANY MANAGEMENT SYSTEM**

**Sexual Harassment**

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2	12/18	For Implementation	DGM (HR & Admin)	President (Corp. Affairs, Legal & CS)	MANCOM
1	01/16	For Implementation	President (Corp. Affairs, Ops & CS)	MD	MANCOM
0	03/15	For Implementation	CLO & CS	MD	MANCOM
<b>REV #</b>	<b>DATE</b>	<b>REASON FOR ISSUE</b>	<b>INITIATOR</b>	<b>APPROVER</b>	<b>APPROVED</b>

Owner : President ( Corp. Affairs, Legal & CS)

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**RECORD OF AMENDMENT**

It is certified that the amendments listed below have been incorporated in this copy of the publication.

**DOCUMENT TITLE: SEXUAL HARASSMENT**

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AMDT	AMENDED	PARA	DESCRIPTION OF
1	01/16	-	Change in designation from CLO & CS to president (Corp. Affairs, Ops & CS)
2	12/18	-	Change in designation from President (Corp. Affairs, Ops & CS) to president (Corp. Affairs, Legal & CS)

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### **3.0 CORE PRINCIPLES**

Company Policy on Prevention of women against sexual harassment at the work place.

### **3.1 TITLE AND COMMENCEMENT:**

This Policy will be called Seamec Limited policy on Protection of Women against sexual harassment at the work place and is in force with effect from 13th February 2015. This policy complies of the provisions of the Sexual Harassment of Women at Work Place (Prevention, prohibition and Redressal) Act, 2013 and Rules made thereunder.

### **3.2 SCOPE:**

This Policy shall apply to all persons employed at the workplace for any work of regular, temporary, ad hoc or daily wage basis, directly or through an agent / contractor, including persons working on a voluntary basis and also apprentices, trainees, probationers, agent, including consultants, Auditors and representatives of Group of the Company and includes any aggrieved woman of any age whether employed or not, who alleges sexual harassment at work place.

### **3.3 OBJECTIVE:**

The Company firmly believes that every employee has a right to work in an environment free from harassment, intimidation or offensive behaviour and issues of harassment will be resolved without fear of reprisal. The policy is designed to take effective measure to prevent, prohibit, sexual harassment and have the mechanism to redress cases of sexual harassment and impose punishment for those responsible for sexual harassment.

### **3.4 POLICY:**

Sexual Harassment in any form will not be permitted or tolerated or condoned by the Company including suspected sexual orientation. The use of Company property including email, Bulletin Boards or any document as a vehicle for harassment is prohibited.

### **3.5 PROHIBITION OF SEXUAL HARASSMENT:**

Sexual Harassment in any form is strictly prohibited.

### **3.6 MEANING OF SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR:**

Sexual Harassment includes any unwelcome sexually determined behaviour, direct or by implication, and includes physical contact and advances, a demand or request for sexual favours, sexually coloured remarks, showing pornography, any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Sexual Harassment in any form will not be permitted or tolerated or condoned by the Company.

"Sexual Harassment" should not be confused with simple friendly behaviour, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is an unwelcome act.



### 3.7 PREVENTION OF SEXUAL HARASSMENT:

No woman shall be subjected to sexual harassment at any work place,

The following circumstances among other circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment;

- (I) implied or explicit promise of **preferential** treatment in the persons employment/promotion or;
- (II) implied or explicit threat of **detrimental** treatment in the persons employment/ promotion; or
- (III) implied or explicit threat about the persons present or future employment/promotion status; or
- (IV) interferes with work or creating an intimidating or offensive or hostile work environment for the persons; or
- (V) Humiliating treatment likely to affect the person's health or safety.

### 3.8 RIGHTS AND RESPONSIBILITIES OF EMPLOYEES:

3.8.1 Every Employee shall be entitled to a safe work environment with dignity and free from sexual harassment.

3.8.2 Every Employee shall be entitled to complain against "Sexual Harassment" to which she was subject to or which was targeted at her, to the Internal Complaints Committee or to the Chairperson or any other Member of the Internal Complaints Committee established under this policy, as the case may be.

3.8.3 Any Employee shall promptly report any incident of Sexual Harassment that comes to his/her knowledge to the Internal Complaints Committee or to the Chairperson of the Internal Complaints Committee as the case may be.

### 3.9 THE INTERNAL COMPLAINTS COMMITTEE:

The names and contact details of the members of the Internal Complaints Committee (ICC) is given in Annexure One. The term of office of the Internal Complaints Committee is for a period of 3 years from **13th February 2015**. On the expiry of the three-year period, the existing members of the Internal Complaints Committee (ICC) will continue to hold office, till the new Internal Complaints Committee.

### 3.10 POWERS AND DUTIES OF THE INTERNAL COMPLAINTS COMMITTEE:

The Internal Complaints Committee will receive the complaints on sexual harassment from the aggrieved woman, enquire into the complaints, conduct the enquiry and submit the findings on the complaint to the management along with its recommendation.

### 3.11 COMPLAINTS PROCEDURE:

3.11.1 Any employee who is subject to sexual harassment as explained herein above or the person who has knowledge of sexual harassment will have a right to lodge a complaint to the committee or its chairperson concerning sexual harassment against an employee and such a complaint needs to be in writing.



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3.11.2 Complaint to be made within 3 months form the date of Incident, in case of series of incidents within 3 months form the date of last incident.

3.11.3 Immediately upon receipt of the Complaint, the member of the Internal Complaints Committee to whom the Complaint is made shall communicate the same to the Chairperson of the Internal Complaints Committee.

3.11.4 Before enquiry, conciliation effort can be made subject to consent of the aggrieved work women.

3.11.5 Within a period of 5 working days from the date of such communication, the Chairperson shall convene a meeting of the Internal Complaints Committee.

3.11.6 The Internal Complaints Committee shall examine the complaint and shall undertake investigation of the complaint after giving opportunities to the complainant to present her case and the respondent to give his / her version. The Internal Complaints Committee may examine witness from both the sides and also give opportunity of cross-examining of the witness. Documents if any produced by the parties may be taken on record. Neither the complainant nor the respondent is allowed to bring in any legal practitioner to represent them in their case at any stage before the Internal Complaints Committee. The Internal Complaints Committee on completion of the inquiry will submit its report to the complainant, respondent and the company management. The Internal Complaints Committee shall enquire into the complaints as prescribed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, and the Rules made thereunder as in force from 13<sup>th</sup> February 2015 and changes made thereunder from time to time.

### **3.12 ACTION DURING PENDENCY OF PROCEEDINGS:**

During the Pendency of enquiry, Internal Committee may recommend to Employer to grant leave to aggrieved woman up to 3 months and may restrain respondent from reporting on work performance of aggrieved woman.

### **3.13 CONSEQUENCE OF COMPLAINT BEING PROVED:**

In the event allegations made in the complaint are proved against the respondent, it will be taken as proved misconduct and the Internal Committee may recommend to management for actions against the respondent including compensation, written apology, warning, reprimand and censure withholding promotion, increment, termination from the services.

### **3.14 CONSEQUENCE OF FALSE COMPLAINT:**

In the event allegations made in the complaint are proved to be false or malicious then the Internal Committee may recommend to the management compensation, written apology, warning, reprimand and censure withholding promotion, increment, termination from the services and the management will take appropriate action in accordance with the provisions of Company's Rules.



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### 3.15 OBLIGATIONS OF THE MANAGEMENT:

The Management of the Company shall promptly constitute Internal Complaints Committee and provide all necessary assistance for the purpose of ensuring full effective and speedy implementation of this Internal Complaints Committee constituted as above and shall implement the decisions in an expeditious manner.

In addition to above, the duties of the Employer are as under:

- Provide safe working environment.
- Communicate and notify to all employees the concept and policy of Company's on Protection of women against sexual harassment and the penal consequences in case of occurrence of harassment.
- Organise workshop and awareness programme at regular interval.
- Ensure all rules and regulations are complied with.
- Making available all relevant information and facilities to Internal Committee.
- Provide assistance to the aggrieved woman if she choose to file complaint in relation to offence under Indian Penal Code.
- Ensure Annual Report from the Internal Committee and also include information on number of cases of harassment in the Annual Report of the Company.

### 3.16 THIRD PARTY HARASSMENT:

In case of third party Sexual Harassment the Internal Complaints Committee will actively assist and provide all its resources to the complainant in pursuing the complaint.

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the respondent under any other provision of civil or criminal law.

**Dated: 13<sup>th</sup> December 2018**

**Place: Mumbai**

**Signature:**

**Name: S N Mohanty**

**President**

**Corporate Affairs, Legal & Company Secretary**



**COMPANY MANAGEMENT SYSTEM**SEAMEC/HRE/007  
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Sr. No	Name	Designation	Company Employee /External person	Contact Address &Email	Tel Number& Mobile Number
1.	Ms. Medha Khale	Presiding Officer	Company Employee	A/401, Utpal Park, Off Sitladevi Temple Road, Rang Udyan Compound, Mahim. MUmbai - 400 016. mkhale@seamec.in	9819361509
2	Ms. Dipti Sanghvi	Member	Company Employee	3, Hari Krupa, Kamala Nehru Cross Rd No- 3, Kandivali (W), Mumbai- 67 dsanghvi@seamec.in	9820200812
3	Mr. K.T.Thomas	Member	Company Employee	84 3/14, Brindaban, Majiwade, Thane (W) ktthomas@seamec.in	9820038424
4	Ms. Dolly Sheth	Member	External Person	CA. Dolly Sheth 1602, B wing, purav heights, T.G.Path, Girgaum, Mumbai -400004 shethdolly@vahoo.Com	9930376051

**Dated: 13<sup>th</sup> December 2018****Place: Mumbai****Signature:****Name: S N Mohanty****President****Corporate Affairs, Legal & Company Secretary****N.B. The policy is in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder as in force.**

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