

SAMPAT ALUMINIUM LIMITED
(Formerly known as SAMPAT ALUMINIUM PRIVATE LIMITED)
CIN: U27203GJ1999PLC036129
REG. OFF.: 265, RAKANPUR, OPP. MANPASAND WAYBRIDGE, RAKANPUR,
KALOL, GANDHINAGAR, GUJARAT-382721, INDIA
EMAIL ID: deorawires@gmail.com | MOBILE NO: +91 9825081914

PREVENTION OF SEXUAL HARASSMENT POLICY

SAMPAT ALUMINIUM LIMITED
(Formerly known as SAMPAT ALUMINIUM PRIVATE LIMITED)
CIN: U27203GJ1999PLC036129
REG. OFF.: 265, RAKANPUR, OPP. MANPASAND WAYBRIDGE, RAKANPUR,
KALOL, GANDHINAGAR, GUJARAT-382721, INDIA
EMAIL ID: deorawires@gmail.com | MOBILE NO: +91 9825081914

❖ INTRODUCTION

- 1.1 **Sampat Aluminium Limited (Formerly known as Sampat Aluminium Private Limited)** (the “Company”) is committed to creating a safe work environment that is free from any form of sexual harassment and where all employees are treated with dignity and respect. The company is dedicated to maintaining an environment that is free from coercion and intimidation.
- 1.2 The Company shall adopt certain procedures and guidelines to govern cases against sexual harassment. The procedure has been provided below in this policy.
- 1.3 All allegations of sexual harassment shall be taken seriously by **Sampat Aluminium Limited (Formerly known as Sampat Aluminium Private Limited)** and shall be governed by this Policy.

❖ SCOPE

This Policy is applicable to all Employees of **Sampat Aluminium Limited (Formerly known as Sampat Aluminium Private Limited)**, whether permanent, temporary, probationary, part-time, consultants, volunteers, or engaged through contractors or agents.

Where Sexual Harassment occurs against any female Employee due to an act by a third party or outsider while on official duty, **Sampat Aluminium Limited (Formerly known as Sampat Aluminium Private Limited)** will take necessary steps as per the applicable rules and regulations to initiate action at the workplace of the third party or outsider.

❖ DEFINITIONS

- a) **"Act"** means "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and any amendments thereto, including relevant provisions under the **Bharatiya Nagarik Suraksha Sanhita, 2023, Bharatiya Nyaya Sanhita, 2023, and Bharatiya Sakshya Adhiniyam, 2023.**
- b) **“Aggrieved Woman”** means any female Employee of our Company or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.
- c) **“Internal Complaints Committee”** means a committee constituted by the Board of our Limited as per the provisions of applicable laws.
- d) **“Sexual harassment”** means and includes: -

SAMPAT ALUMINIUM LIMITED
(Formerly known as SAMPAT ALUMINIUM PRIVATE LIMITED)
CIN: U27203GJ1999PLC036129
REG. OFF.: 265, RAKANPUR, OPP. MANPASAND WAYBRIDGE, RAKANPUR,
KALOL, GANDHINAGAR, GUJARAT-382721, INDIA
EMAIL ID: deorawires@gmail.com | MOBILE NO: +91 9825081914

- Unwelcome 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 sexual nature."

❖ INTERNAL COMPLAINTS COMMITTEE

The Internal Complaints Committee shall comprise of:

- A Presiding Officer (a senior female Employee)
- At least two members with experience in social work or legal knowledge
- One external member from an NGO or relevant organization.

The Committee shall meet at least once a year and report cases as required under applicable laws.

❖ COMPLAINT PROCEDURE

LODGING A COMPLAINT:

An Aggrieved Woman can file a complaint with the Presiding Officer of the Internal Complaints Committee within one year of the incident, as per the **Bharatiya Nagarik Suraksha Sanhita, 2023**, which extends the limitation period from three months to one year.

If an Aggrieved Woman is unable to make a complaint due to physical or mental incapacity, a relative, friend, co-worker, or any person with knowledge of the incident may do so with written consent.

The Committee may extend the time limit if unavoidable circumstances prevented the filing of a complaint within the prescribed period.

❖ RESOLUTION THROUGH CONCILIATION

Before initiating an inquiry, the Committee may attempt conciliation if requested by the Aggrieved Woman. However, no monetary settlement shall be made the basis of conciliation.

❖ RESOLUTION THROUGH FORMAL INQUIRY

The Committee will initiate an inquiry if:

- No conciliation is requested
- Conciliation fails
- The complainant alleges non-compliance with settlement terms.

SAMPAT ALUMINIUM LIMITED
(Formerly known as SAMPAT ALUMINIUM PRIVATE LIMITED)
CIN: U27203GJ1999PLC036129
REG. OFF.: 265, RAKANPUR, OPP. MANPASAND WAYBRIDGE, RAKANPUR,
KALOL, GANDHINAGAR, GUJARAT-382721, INDIA
EMAIL ID: deorawires@gmail.com | MOBILE NO: +91 9825081914

The inquiry shall be conducted as per principles of natural justice, and findings shall be reported to the Company's Managing Director within 10 days from completion. The employer must act upon recommendations within 60 days of receipt.

❖ PENAL CONSEQUENCES OF SEXUAL HARASSMENT

If the Committee finds the offense falls under criminal law, it shall recommend filing a police complaint under **Bharatiya Nyaya Sanhita, 2023**, which replaces the Indian Penal Code (IPC) and includes offenses related to sexual harassment.

❖ CONFIDENTIALITY

The identity of the complainant, respondent, and witnesses, along with case details, shall be kept confidential in accordance with the **Bharatiya Sakshya Adhiniyam, 2023** and Right to Information Act, 2005 provisions.

❖ AWARENESS

The Company shall conduct periodic workshops and awareness programs to educate employees about this Policy and the legal framework governing sexual harassment.

FOR, SAMPAT ALUMINIUM LIMITED
(Formerly known as SAMPAT ALUMINIUM PRIVATE LIMITED)



SANKET SANJAY DEORA
MANAGING DIRECTOR
DIN: 01417446