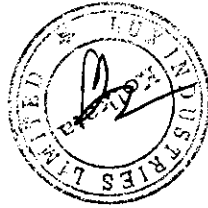


LUX INDUSTRIES LIMITED

**POLICY OF THE COMPANY UNDER THE SEXUAL HARASSMENT OF WOMEN
AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT,
2013**

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1. Preamble

- 1.1 Lux Industries Limited (hereinafter referred to as 'Company') is committed to creating a safe and healthy work environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all its employees have the human right to be treated with dignity. Sexual Harassment at the work place or in the course of official duties, if involving employees of the Company shall be considered a grave offence, and is therefore punishable under the applicable laws.
- 1.2 The Supreme Court of India in its landmark judgement of 1997 in 'Vishaka and others vs. State of Rajasthan', laid down guidelines making it obligatory for every employer and other responsible persons to provide a mechanism to redress grievances pertaining to workplace sexual harassment and evolve a specific policy to combat sexual harassment in the workplace and enforce the right to gender equality of working women. Sexual Harassment is a violation of right of woman to gender Equality under Articles 14 and 15, Right to Life and Dignity under Article 21 and Right to Work (Liberty) under Article 19(1)(g) of the Constitution of India.
- 1.3 The Government of India has made effective on April 23, 2013 a law called 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 on prevention of sexual harassment against female employees at the workplace. Any person making unwelcome physical contact and explicit sexual overtures, demanding or requesting sexual favours, making sexually coloured remarks or fine, or with both.
- 1.4 This Policy has also been formulated to create and maintain a safe working environment where all employees treat each other with courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. Employees in the Company are entitled to work in an environment free from any form of discrimination or conduct which can be considered harassing, coercive, or disruptive.
- 1.5 This Policy seeks to assist individuals who believe they have been subjected to such behaviour with appropriate support and remedial action.

2. Scope

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. These Rules and Procedures shall be applicable to all complaints of sexual harassment made by a woman employee of the Company against male employee of the Company provided the harassment has taken place at work place or in the course of official duties.



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3. Objective

Company is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

4. Definitions –

- 4.1 Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- 4.2 Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- 4.3 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- 4.4 Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- 4.5 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, as defined in 4.1 above, may amount to sexual harassment:—
 - (i) Implied or explicit promise of preferential treatment at work; or
 - (ii) Implied or explicit threat of detrimental treatment at work; or
 - (iii) Implied or explicit threat about present or future employment status; or
 - (iv) Interference with work or creation of an intimidating or offensive work environment; or
 - (v) Humiliating treatment likely to affect health, safety or self-esteem.

5. Internal Complaint Committee (ICC) / Complaint Redressal Committee

- 5.1 An Internal Complaints Committee/ Complaint Redressal Committee (hereinafter called 'Committee') have been constituted by the Management of the Company to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:
 - (i) Mrs. Smita Mishra Company Secretary & Compliance Officer- Chairperson
 - (ii) Mr. Rajendra Kumar Bhutoria HR Manager - Member
 - (iii) Mrs. Shampa Basu – Senior HR
- 5.2 No person who is a complainant, witness or defendant in the complaint of sexual harassment shall be a member of a Committee.
- 5.3 Any Committee member charged with sexual harassment in a written complaint must step down as a member during the enquiry into that complaint.
- 5.4 In the Committee, not less than half of the number of members shall be women.
- 5.5 Changes in the Members of the Committee, whenever necessary, shall be made as expeditiously as possible.

6. Procedure for dealing with complaints of sexual harassment

- 6.1 If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Committee through the respective HR Manager or the Department Head.



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- 6.2 Ideally, the complaint should be lodged immediately or within a reasonable period 3 months from the date of incident/last incident.
- 6.3 All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
- 6.4 The committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- 6.5 Any victimization of, or retaliation against, the complainant or any employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- 6.6 In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the Committee post investigations may recommend disciplinary action against the complainant.

7. Disciplinary Action

- 7.1 In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.
- 7.2 Sexual harassment will not be tolerated at Company. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behaviour has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

8. Applicability

The Policy shall become operational from the date as may be decided by the Board of Directors of the Company.

