

POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

ENPRO INDUSTRIES PRIVATE LIMITED [EIPL]

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This policy has been instituted based on the philosophy of Enpro Industries Private Limited towards equality of opportunity to all irrespective of gender bias and provisions of ‘The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013, read with Rules made thereunder. This policy will at all times be subject to the provisions of the aforesaid Act and Rules (as amended from time to time).

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Topic	Policy for Prevention of Sexual Harassment at Workplace
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Approved & Authorized By	Internal Complaints Committee & Board of Directors

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I. Commitment:

As a Company, we are committed to provide safe work environment that is free from any kind of sexual harassment or intimidation of either verbal, non-verbal or physical nature.

The Company also believes and ensures that all employees of the Company have the right to be treated with dignity, respect and afforded equitable treatment.

Company is thereby committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

II. Policy Statement:

It is our desire to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and therefore, we have zero-tolerance for sexual harassment and any act of sexual harassment will invite serious disciplinary action. This policy is meant to educate the employees about what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event, and in case of any such occurrence, to enable a fair mechanism for dealing with such conduct.

Sexual harassment at the work place or at any other place being in the course of official duties if involving employees of the Company shall be viewed as a grave offence and will be punishable. The commission of offence of Sexual Harassment as per Indian Penal Code 1860 is a penal offence under which the punishment can range from simple to rigorous imprisonment or fine or both.

III. Policy Objectives:

The salient features of the Policy are:

- To provide an appropriate policy document in compliance with and within the overall ambit of 'The Sexual Harassment of Women at Work Place (Prevention, Prohibition and Redressal) Act, 2013' as well as in line with global policies & practices, which can be implemented effectively, and monitored & communicated cogently to all employees.
- To promote gender equality and a safe, discrimination-free work environment for all employees.

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- To encourage employees to understand their responsibilities and take an active role in preventing harassment.
- To provide a safe atmosphere for employees, who can depend upon the organization's support in resolving their concerns on sexual harassment at work regardless of position or status.

IV. Applicability & Scope:

This Policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

The policy applies to all categories of employees of the Company at all locations/units engaged in full-time or part-time employment, including permanent management and workmen, temporary workmen, trainees, probationers and employees on contract at their workplace or at guest sites. This Policy will extend to guests, visitors, customers or suppliers or any other business associates, etc.

This policy will be applicable to all workplaces and is not restricted only to the Company's premises but also company vehicles, third party premises, off site meetings and office parties at external venues, etc.

The Policy covers harassment of women by men, or of men by women or between the same sexes.

V. Definitions:

Sexual Harassment:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes but not limited to:

unwelcome sexual advances (verbal, written or physical), such as sexually colored remarks, jokes, letters, phone calls, e-mails, gestures, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;

demand or request for sexual favors either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any Company activity;

showing pornography;

any other type of sexually-oriented conduct;

verbal abuse or 'joking' that is sex-oriented;

any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.

Employee:

"Employee" means and includes any person on the roll of the Company or carrying out any work for & on behalf of the Company and may have been hired or is Permanent, Temporary, Contracted or on deputation, Retainership basis or working as consultant, etc. either directly or indirectly through vendor organization.

Workplace:

The workplace includes:

1. All offices and other premises where the Company's business is conducted or carried out,
2. All Company related activities performed at any other site away from the Company's premises,

Complainant:

Any employee or an aggrieved individual who has registered the complaint against the respondent for alleged sexual harassment offence.

Respondent:

Employee or otherwise against whom the complaint has been filed.

VI. Responsibilities Regarding Prevention of Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

Further it is the impact/effect of the behavior on the victim and not the intent of the offender that is crucial in investigation of such cases. Additionally, ignorance of any aspect of this policy will not be a defence during an enquiry on the matter.

Employees' responsibilities:

The Company expects all its employees to comply with its policy and code of conduct towards creating a respectful and dignified work-environment for all. Employees must:

- Familiarize themselves completely with this policy as well as its contents.
- Co-operate with any measures introduced to promote equal opportunities.
- Make sure they understand and respect the sensitivities of co-workers and other people in the workplace.
- Refrain from discriminatory, offensive or disrespectful behavior, or any behavior which is in contradiction to the letter or the spirit of this policy.
- Make sure they extend support to any person who they suspect is being harassed in addition to reporting any such instance of sexual harassment to the appropriate person/s.
- Maintain confidentiality regarding any aspect of a complaint or an inquiry of which they may have information or may be included.

VII. Complaint Mechanism:

An appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaints made by the victims.

VIII. Internal Complaints Committee:

The Company has constituted a centralized Internal Complaints Committee with the representatives across all the Enpro locations for redressal of sexual harassment complaints and for ensuring time bound treatment of such complaints.

Initially and till further notice, the Internal Complaints Committee will comprise of the following members:

1. Mrs. Alka S. Karkare, the Joint Managing Director (Presiding Officer)
2. Mrs. Pranita S. Alurkar - Member from an NGO (Independent Member)
3. Mrs. Vidya A. Bhosale (Member)
4. Mr. Ranjeet G. Singh (Member)
5. Mr. Devendra V. Deshpande (Member)
6. Mrs. Ashwini T. Thopate (Member)
7. Mrs. Swati V. Shukla (Member)
8. Mrs. Kavita S. Jondhale (Member)

A quorum of 4 members is required to be present for the proceedings to take place which should include presence of the Presiding Officer.

The Internal Complaints Committee will be responsible for:

- Investigating every formal written complaint of sexual harassment,
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment,
- Discouraging and preventing employment related sexual harassment.

IX. Procedures For Resolution, Settlement Or Prosecution Of Acts Of Sexual Harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

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Complaint Procedure:

1. An employee with a harassment concern may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in the form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employees are required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
2. The Presiding Officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.
3. In case the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
4. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Internal Complaints Committee.
5. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
6. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Managing Director & Head HR as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Managing Director & Head HR will ensure corrective action on the recommendations of the Internal Complaints Committee and keep the complainant informed of the same.

7. In case the complaint is found to be false and malafide, the Complainant shall, if deemed fit, be liable to appropriate disciplinary action by the Management.

RETALIATION:

This policy recognizes retribution or retaliation in the context of reporting acts of sexual harassment as a serious violation. The report and investigation of allegations of retaliation will follow the procedures set forth in this Policy and will be treated as an additional complaint and investigated similarly. Any person found to have retaliated against an individual for reporting harassment, or for participating in an investigation of allegations of such conduct, may expect the Company to impose severe disciplinary action.

X. Manner of Taking Action Against The Respondent:

Where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take disciplinary action which may include the following:

- a) Written apology;
- b) Warning;
- c) Reprimand or Censure;
- d) Withholding of Promotion;
- e) Withholding of pay rise or increments; or
- f) Dismissal/Terminating the respondent from service; or
- g) Suspension; or
- h) Undergoing a counseling session or carrying out community service.

XI. Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment confidentiality will be maintained throughout the investigation process to the extent practicable and appropriate under the circumstances.

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Accordingly, any information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken shall not be published, communicated or made known to the public, press or media in any manner. Where the duty to maintain confidentiality is contravened by any person so entrusted will be liable for action as per Company's disciplinary policy.

XII. Appeals & Alternate Legal Remedies:

An employee who feels that a sexual harassment complaint or a retaliation complaint did not receive prompt and fair response/resolution may contact the Managing Director.

Additionally, nothing in this policy shall prevent the aggrieved individual or the respondent from pursuing legal remedies or resolution through government agencies or the Courts of Law of the Country.

XIII. Punishment:

Any person accused of and proven to be guilty of committing the offence of sexual harassment against the will of a woman as per Section 354 of the Indian Penal Code 1860 shall be punishable with the punishment ranging from the simple to rigorous imprisonment for the term of one year to three years, or with fine, or with both.

XIV. Reports & Documents:

Annual Report summarizing complaints and Redressal of Sexual harassment shall be prepared by the designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XV. Policy Implementation & Review:

The Policy will be implemented and reviewed by the HR department in consultation with the ICC. Company reserves the right to amend, abrogate, modify, rescind/replace/re-instate the entire policy or any part of it at any time.

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

Annexure I: Template for Reporting Sexual Harassment

To,
The Internal Complaints Committee
Enpro Industries Private Limited.

Subject: Complaint regarding Sexual Harassment.

Who is/are the person/s involved in this sexual harassment case? Please provide following details:

Name - _____

Designation - _____

Location - _____

and relationship with you - _____
(e.g. supervisor, colleague, etc.)

Please provide Critical Incidents and Factual Data:

- a. Please describe the incident/s:

- b. List supporting information/data that the Committee can seek from you while investigating
e.g. exact date/s, place/s of the incident/s, witnesses, if any, text messages, emails, etc:

Date & Location: _____

Name of the Complainant _____

Contact Information:
(Official e-mail id /cell no.) _____

Signature _____