



ADANI TRANSMISSION LIMITED
PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT
WORKPLACE

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1. Background, Purpose & Objective

- a. Transmission business is committed to creating a healthy working environment that enable employees to work without fear of prejudice, gender bias and sexual harassment.
- b. Our business will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women employees are not subjected to any form of harassment.
- c. Sexual harassment at the workplace or other than workplace, if involving employees, is a grave and punishable offence.
- d. The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as "the Act") enjoins upon employers to lay down guidelines / policies to prevent and provide redressal mechanism in the event of sexual harassment.
- e. The following policy is accordingly laid down to prohibit, prevent or deter the commission of acts of sexual harassment of Women at workplace and to provide the procedure for redressal of complaints pertaining to sexual harassment.

2. Scope & Coverage

All employees of Adani Transmission business and its subsidiary in India, including probationers, apprentices, trainees, consultants, advisors, associates of outsourcing agencies, employees of contractors etc.

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

3. Definition of "Sexual Harassment" & "Workplace"

3.1 "Sexual Harassment" would mean and include any of the following:

- i) Unwelcome sexual advances, requests or demand for sexual favour, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- ii) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or

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molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects her/his performance;

- iii) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- iv) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- v) Any unwelcome gesture by an employee having sexual overtones.

3.2 "Workplace" would mean and include the following:

- i) All offices or other premises where the company's business is conducted.
- ii) Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer.

4. Internal Complaints Committee (ICC)

As per the act following is the Internal Complaints Committee (ICC) for the transmission business.

S. No.	Structure	Name	Designation
1	Presiding Officer	Manisha Rupani	Deputy Manager – HR
2	Member	Nisha Patel	Deputy Manager – CEO office
3	Member	Kautilya Desai	Asso. General Manager
4	External member	Rajiv Shah	Advocate

Respective ICC committees have been formulated for subsidiaries of Adani Transmission Ltd.

5. Redressal Process

- 5.1 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days and not more than (3) three months of occurrence of incident. The employee is required to disclose her name, department, division and location she is working in to enable the Chairperson to contact her and take the matter forward.
- 5.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 5.3 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 5.4 At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material etc., to substantiate / her complaint.
- 5.5 If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement. In any event the Chairperson of the 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, not later than 30 days from receipt of the complaint.
- 5.6 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 5.7 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

5.8 In case the complaint is found to be false, the Complainant shall be liable for appropriate disciplinary action by the Management.

6. Enquiry Process

- 6.1 The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 6.2 The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- 6.3 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 6.4 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- 6.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he / she shall supply original documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- 6.6 The Committee shall call upon all witnesses mentioned by both the parties.
- 6.7 The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- 6.8 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to Bu / Group HR as the case may be. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

- 6.9 The Head HR (BU / Group) as the case may be will direct appropriate action in accordance with the recommendation proposed by the Committee. The Head-HR will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- 6.10 The Committee shall be governed by provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and any rules / amendments thereof, including Supreme Court Guidelines on the subject.

7. General

- 7.1 Corrective action may include any or all of the following:
- i. Formal apology
 - ii. Counselling
 - iii. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - iv. Change of work assignment / transfer for either the perpetrator or the victim.
 - v. Suspension or termination of services of the employee found guilty of the offence withholding of increment / promotion / reward / incentive / bonus etc.
- 7.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 7.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the committee shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 7.4 The Committee shall analysis and put up report on all complaints of this nature at the end of the year for submission to the management.
- 7.5 In case the Committee fined the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.