Ganesh Steel & Alloys Ltd.

14, Netaji Subhas Road
"SAATHI CHAMBER" Room No. 315
3rd Floor, Kolkata-700 001
Ph.: 033-2231 3965, 2231 3966
Tele Fax : 033-2231 3965
E-mail : gsteelalloys@rediffmail.com
CIN No. : U51909WB1995PLC072281
GSTIN : 19AABCG1420G1Z2

COMPANY POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

OBJECTIVE:

Ganesh Steel & Alloys Limited ("GSAL" / "the Company") is committed to propagate women's rights and equality in the workplace and to provide a work environment that ensures every woman employee is treated with dignity and equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity. It will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that employees are not subjected to any form of harassment.

SCOPE:

This policy applies to all categories of employees of GSAL, including permanent employees, trainees and contractual at its workplace.

1.0. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving:

1.1. Unwelcome and unsolicited sexual behaviors (verbal, written or physical)

1.2. Demand or request for sexual favours

1.3. Any other type of sexually-oriented conduct

1.4. Sexually coloured remarks and intones

1.5. Any conduct which creates a hostile and humiliating work environment and acceptance non-acceptance of the conduct by the employee can affect the employment decisions.

1.6. Implied or explicit promise of preferential/detrimental treatment in matters of employment.

1.7. Humiliating treatment likely to have an effect on the health/safety of the concerned employee.

2.0. COMPLAINTS COMMITTEE:

An Internal Committee has been constituted by the management under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 to consider and redress complaints of Sexual Harassment. The Members of the Committee are as follows:

1. Ms. Preeti Dudhoria-Presiding Officer (Chairperson)
2. Ms. Snehlata Baid-Member
3. Mr. Kartik Muni-Member
4. Mr. Biswajit Mukherjee-Member

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Above mentioned members of the committee can be changed at the discretion of the management from time to time.

3.0. ROLE OF THE COMMITTEE:

3.1 The Committee shall decide whether the facts contained in the complaint make out a case of "sexual harassment" in light of the definition contained in the Policy.

3.2 The Committee shall look into the truth of the allegations contained in the complain and has powers to investigate the issue.

3.3 The Committee shall look into the truth of any allegation of retaliation against victimization of the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.

3.4 The Committee shall recommend the penalties / action to be taken against any person found guilty of having sexually harassed the complainant, up to and including termination, to the HR Department.

3.5 The Committee shall recommend the penalties / action to be taken against any person found guilty of having retaliated against / victimized the complainant or any other person assisting her as a result of such complaint having been made or such assistance having been offered.

3.6 The Committee shall recommend appropriate psychological, emotional and physical support (counseling, security and other assistance) for the victim.

3.7 The Committee shall recommend the penalties / action to be taken against any person found guilty of having made false claims of having been sexually harassed, up to and including termination, to the HR Department.

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1.0. POWERS OF THE COMMITTEE:

4.1 The Committee shall have the power to summon witnesses and call for documents or any information from any employee.

4.2 If the Committee has reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such documents or information by serving a notice in writing on that person, summoning the person, or calling for such documents or information at such place and within such time as may be specified in the written notice.

4.3 Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the Committee shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.

4.4 Upon production of documents / information called for by it, the Committee shall have the power to (i) make copies of such documents / information or extracts there from; or (ii) retain such documents / information for such period as may be deemed necessary for purposes of the proceedings before it.

4.5 The Committee shall have the power to issue interim directions to / with regard to any person participating in the proceedings before it.

4.6 The Committee shall have the power to recommend the action to be taken against any person found guilty of (a) sexually harassing the complainant; (b) retaliating against / victimizing the complainant or any other person before it; and (c) making false charges of sexual harassment against the accused person.

5.0. PROCEDURE TO BE FOLLOWED BEFORE THE COMMITTEE:

5.1 The management shall forward the written complaint to the Committee upon its formation.

5.2 The Committee may direct the complainant to prepare and submit a detailed statement of incidents if the written complaint lacks exactness and required particulars, within a period of two (2) days from such direction or such other time period that the Committee may decide.

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5.3 The Committee shall direct the accused employee(s) to prepare and submit a written response to the complaint / allegations within a period of four (4) days from such direction or such other time period as the Committee may decide.

5.4 Each party shall be provided with a copy of the written statement(s) submitted by the other.

5.5 The Committee shall conduct the proceedings in accordance with the principles of natural justice and in keeping with the Guidelines and the Policy. It shall allow both parties reasonable opportunity of presenting their case. However, should the accused choose not to participate in the proceedings, the Committee shall continue ex parte.

5.6 The Committee shall allow both parties to produce relevant documents and witnesses to support their case. Documents produced by either party shall be affixed with that party's signature to certify the document as original / true copy.

5.7 The party against whom the document / witness is produced shall be entitled to challenge / cross-examine the same.

5.8 The Committee shall sit on a day-to-day basis to record and consider the evidence produced by both parties.

5.9 Minutes of all proceedings of the Committee shall be prepared and duly signed by the members of the Committee.

5.10 The Committee shall make all endeavour to complete its proceedings within a period of fifteen (15) days from its formation.

5.11 The Committee shall record its findings in writing supported with reasons and shall forward the same with its recommendations, to the HR Department, within a period of five (5) days from completion of the proceedings before it. In case the Committee finds that the facts disclose the commission of a criminal offence by the accused person, this shall be specifically mentioned in the Committee's report.

5.12 If, in the course of the proceedings before it, the Committee is satisfied that *a prima facie* case of sexual harassment is made out against the accused employee(s) and that there is any chance of the recurrence of any such action, or that it is required to do so in the interests of justice, it may, on the request of the complainant or otherwise, recommend the transfer of such employee(s) from their present position, or even their suspension, pending the inquiry.

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5.13 If, in the course of the proceedings before it, the Committee is satisfied that any person has retaliated against / victimized the complainant or any person assisting her as a result of the complaint having been made or such assistance having been offered, the Committee shall report the same in writing, to the HR Department, with reasons and with recommendations of the action to be taken against such person.

5.14 If, at the culmination of the proceedings before it, the Committee is satisfied that the complainant has knowingly brought false charges of sexual harassment against any person, it shall report the same in writing to the HR Department, with reasons and with recommendations of the action to be taken against such person.

OTHER POINTS TO BE CONSIDERED:

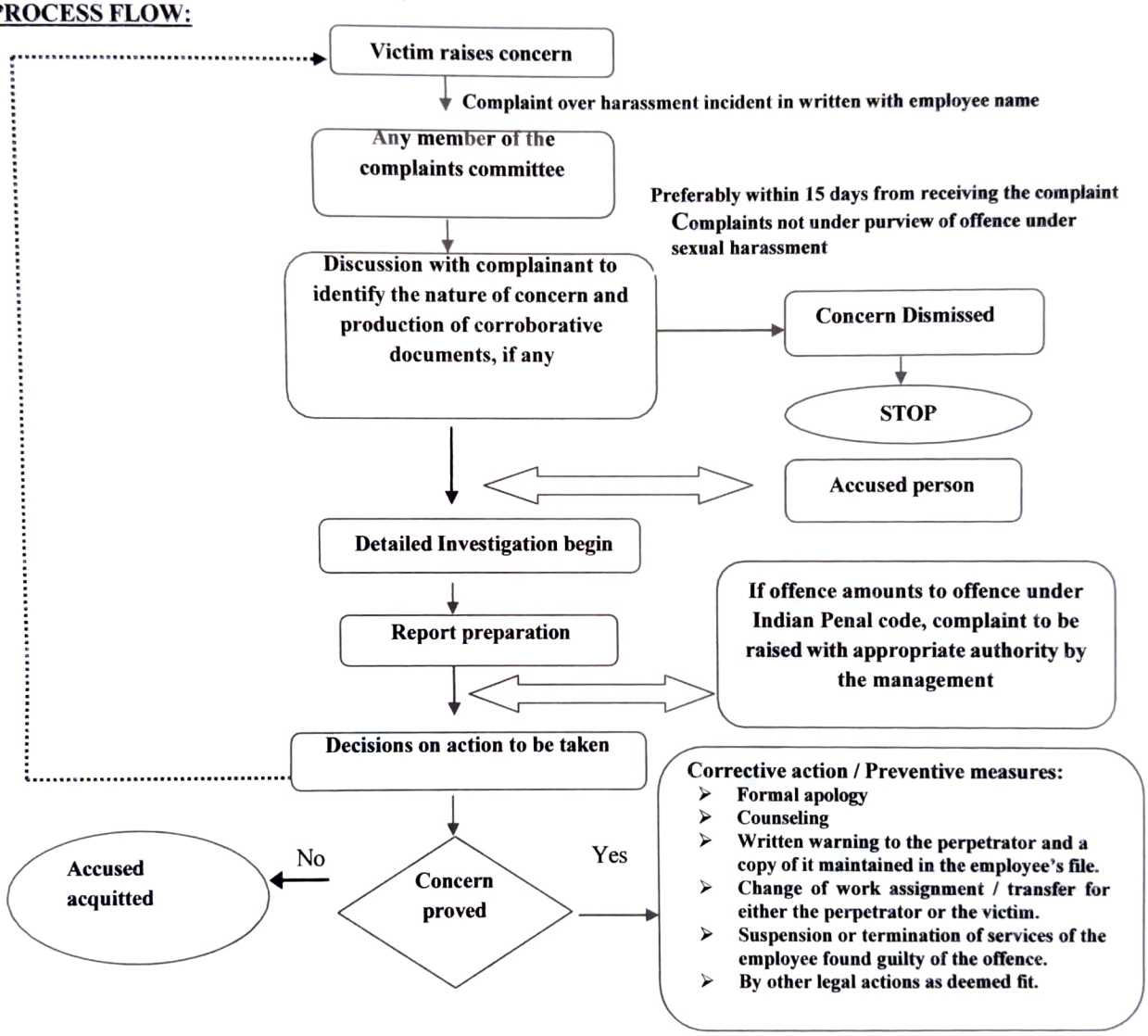
- GSAL will ensure to protect the victim's interest and confidentiality of the concerned to the extent practicable and appropriate under the circumstances for correct investigation.
- GSAL is committed to ensure that employee is not subject to any form of reprisal and any reprisal will be subject to disciplinary action.
- In case the complaint is found to be false, the complainant shall, if deem fit, be liable for appropriate disciplinary action by the management.
- In dealing with incidents under the ambit of this policy, GSAL shall comply, to the extent practicable, with the Vishaka Guidelines against sexual harassment at workplace, as laid down by the Hon'ble Supreme Court.

The above policy is subject to change at any point of time on the sole discretion of the management or as guided by the law.

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PROCESS FLOW:



For **Ganesh Steel & Alloys Limited**

Preeti

(Preeti Dudhoria)
Chairperson
Internal Complaint Committee