



POLICY ON

PREVENTION OF SEXUAL HARASSMENT

AND

SAFE ENVIRONMENT AT WORKPLACE

Dodla Dairy LIMITED

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POLICY ON PREVENTION OF SEXUAL HARASSMENT AND SAFE ENVIRONMENT AT WORKPLACE

1. OBJECTIVE:

Dodla Dairy is committed to provide good work environment that ensures every employee treated with dignity and respect. The Company also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment.

The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to Sexual Harassment. This policy takes complete cognizance of the latest legislation by the Government of India. The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its rules notification published on 9th December 2013.

2. SCOPE:

This policy applies to all categories of employees of the Company, including permanent, temporary, trainees, and employees on contract basis working at various locations.

It also extends to business take holders viz., Customers, vendors, partners and visitors who are dealing with our employees in the course of business activities. The Policy coverage is not only limited to geographical locations viz. Company's offices / branches but also includes all such places or locations where acts are conducted in context of working relationship.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations

3. DEFINITION OF SEXUAL HARASSMENT:

This policy has defined Sexual antithetical to include any one or more of the following incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.



- Physical contact and advances
- Demand or request for sexual favours
- Sexually coloured remarks, including but not limited to vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.
- Showing pornography or the likes
- Display of pictures, signs etc. With sexual nature / connotation /overtones in the work place and work related area.
- Teasing, Voyeurism and taunts, physical confinement.

Further the following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behavior of sexual harassment may amount to sexual harassment

- Implied or explicit promise of preferential treatment in the employment
- Implied or explicit threat or detrimental treatment in the employment
- Implied or explicit threat about present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety.

An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

4. APPLICABILITY:

This policy shall be applicable to all employees of Dodla Dairy Limited (Direct & Indirect Employees) working across various locations (units/offices) of the Company with immediate effect.

5. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

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

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

7. COMPLAINT REDRESSAL COMMITTEE/ INTERNAL COMPLAINTS COMMITTEE AT WOTK PLACE IN DODLA

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.



The Complaints Committee is 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
1. Dodla Dairy having situated in multiple locations, the Location Internal Complaints Committees (Location-ICC) have three members are constituted at all Units/Offices. The ICC consists of one female member, one male member and is headed by a female employee as the Presiding Officer. Complaints across all the locations other than Corporate office, shall be resolved by the ICC as per the procedure laid down in **Level –I**
 2. Corporate Internal Complaints Committees (Corporate -ICC) is constituted with seven members i.e., three female employees as members, two Male employees as members and the Presiding Officer of the Committee shall be a senior female employee. Also a Female from the NGO shall be appointed as a member in Corporate ICC. at Corporate Office of Dodla Dairy shall co-ordinate with all the locations ICCs. The Corporate Committee shall resolve the complaints as per the procedure laid down in **Level – II.**

Level – I

- Any woman employee who would like to submit a complaint against sexual antithetical situation shall report to her immediate Reporting Authority or Presiding Officer or member of the ICC in verbal or written. If the complaint is against her reporting Authority, she shall submit her complaint to the Presiding Officer of the Corporate ICC or member of the Corporate ICC directly.
- The Presiding Officer 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, preferably within 3 working days from receipt of the complaint.
- The Presiding Officer of the location ICC shall escalate the unresolved complaints to the Presiding Officer of the Corporate ICC at Corporate Office within 3 working days.
- The location ICC shall also encourage women employees for suggestions pertaining to their privacy, working environment and shall be rewarded who shall come up with useful and implementable suggestions.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Level –II

- The presiding Officer of Corporate ICC shall take cognizance of the complaint and initiate remedial measures. The Presiding Officer of Corporate ICC shall initiate conciliation process to settle the complaint if the complaint is not settled at the ICC Level



- If Corporate ICC is of the opinion that the nature of the complaint is to be examined with external agency the committee shall take it forward under the guidance of the respective Plant Manager /Regional HR within 3 working days.
- Corporate Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
- Corporate ICC has sole responsibility to extend facilities/ Protection to the aggrieved and members of the location ICC's
- The Corporate ICC is required to complete the enquiry within a period of six working days and submit a report to the Head – HR & Admin.
- The Complaint shall be thoroughly investigated by the Corporate ICC and recommend the disciplinary action as deemed fit.
- Corporate ICC shall review the location ICC's working on quarterly basis or as and when required.
- The Corporate ICC shall conduct annual summit with all location ICC presiding officers and members for their valuable suggestions for maintaining congenial environment at locations with respect to this policy.
- Location ICC-Presiding officer shall ensure timely submission of reports of location ICC's to Head – HR & Admin.
- In case of any serious situation or emergency at the location, Presiding officer of the location ICC shall immediately bring to the knowledge of the presiding officer of the Corporate ICC for immediate Action.
- The members and the presiding officers of the location ICC and Corporate ICC shall hold office for such period, not exceeding 3 years for the date of their nomination. The presiding officer of respective location shall nominate new member within 3 working days in case of their cessation of employment from the company. The Head – HR & Admin., shall nominate presiding officer within 3 working days in case of their cessation of employment from the company.
- The details of presiding officers and members of Corporate ICC is attached for ready reference as **Annexure-I.**

8. ACCESS TO REPORTS AND DOCUMENTS:

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.

9. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action. The compliant committee member is barred to sit over the proceedings in all the cases, where they are the complainants.



10. ACTION:

1. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
2. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
3. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
 - a. Take action for sexual harassment as a misconduct.
 - b. To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
 - c. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
 - d. Such action will be taken within 30 days of the receipt of report.

11. AWARENESS:

- All the Permanent Employees, employees on contract basis, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
- A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the organization during their initial Induction.
- Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

12. CONCLUSION:

The identity and address of the aggrieved person, respondent and witnesses shall not be published or disclosed to the public or media.

In conclusion, the Company reiterates its commitment to provide its employees, a workplace free from harassment/ discrimination and all employees are treated with dignity and respect.



ANNEXURE – I

Corporate Internal Complaints Committee headed by : Mr. Y V Madhav Reddy, Manager-HR.

Final action taken by : Mr. A. Madhusudhana Reddy, Head – HR.

Internal Complaints Committee

Chairperson	Members	Members
Ms. Ruchita Malpani	Mrs. M. Nataraja Kumari	Mrs. K Savithri (Advocate)
	Mrs. Chirasmitha Priyanka Sahu	Ms. P. Jhansi
	Ms. P. Sirisha	Mr. G. Naresh