



## Reference Document

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Issue 2

### Prevention and Redressal of Sexual Harassment Policy

Date 11-05-2021

#### 1.0 Objective

- 1.1 The Company is committed to equal employment opportunities, i.e., no discrimination based on age, race, color, religion, national origin, or gender. Specifically, Sexual Harassment violates this belief and policy of the Company. All employees are entitled to a work environment free from sexual intimidation.

#### 2.0 Purpose

- 2.1 The purpose of this policy is to detail out the company's approach on dealing with incidences of sexual harassment against fellow colleagues including third party personnel engaged with Domino Printech India LLP and to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively, and expeditiously.

#### 3.0 Scope

- 3.1 Generally, most victims are women, but any person could be a target; Women could harass men or Sexual harassment could occur between members of the same sex.
- 3.2 This Policy shall apply to all allegations of Sexual Harassment (as defined hereinafter) made by an Employee, against another Employee, occurring or having occurred within or outside the premises of Domino Printech India LLP, including allegations made by Employees on overseas programs and trainings and/or during the course of an Employee's employment with Domino Printech India LLP. This Policy shall apply in respect of any act of Sexual Harassment which may have been committed in any place visited by any Employee, travel to such place having been occasioned by or arising out of, during or in the course of employment with Domino Printech India LLP. The Policy shall also apply to all allegations of Sexual Harassment made by a third party against an Employee or vice versa, if such Sexual Harassment has occurred within Domino's premises or during the course of such Employee's employment with Domino Printech India LLP.

#### 4.0 Definition

- 4.1 For this purpose, sexual harassment includes unwelcome sexually determined behaviour (whether directly or by implication) towards a co-worker/subordinate/supervisors/third party personnel involving, but not limited to, any of the following:
  - 4.2 Physical contact or unwelcome advances; or
  - 4.3 Demand or request for sexual favours; or
  - 4.4 Sexually coloured remarks; or
  - 4.5 Showing pornography or other obscene material. This includes circulation/displaying of potentially offensive sexually oriented material in the workplace; or
  - 4.6 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature like jokes/comments/conversations causing or likely to cause awkwardness or embarrassment; or
  - 4.7 Innuendo and taunts of sexual nature; or
  - 4.8 Physical confinement against one's will and likely to intrude upon one's privacy; or sexual assault; or
  - 4.9 Sounds, gestures, staring, leering, gender-based insults or sexist remarks, sexual overtone in any manner such as over telephone/mobile, SMS, Email and includes any act or conduct by a person and belonging to one sex which denies or would deny equal opportunity in pursuit of employment / retention / career development or otherwise making the environment at the workplace hostile, humiliating, or intimidating to person belonging to the other sex; or
- 4.10 Un-welcome propositions/requests for social dates/sexual activity

**5.0 Action by Harassed Employees**

- 5.1 The harassed employee should make direct approach to the harasser and stress that his/her behaviour is unwelcome and firmly request it be stopped. Further, he/she should also bring concerns to the immediate supervisor and/or Human Resources.
- 5.2 The Company takes allegations of sexual harassment seriously and will get the complaint thoroughly investigated; the outcome could range from verbal reprimand to dismissal.

**6.0 Constitution of ICC**

- 6.1 A Complaints Committee is constituted at Corporate level to deal with and redress the grievances of sexual harassment across the Company.
- 6.2 Currently this Complaints Committee comprised of the following members:

External Lady Representative	Ms. Saraswati Phogat
Chief Human Resources Officer/ Presiding Officer/Chairperson	Ms. Shalini Raina
Chief Legal Officer	Mr. Ashok Kumar Shrimali
Lady Employee representative	Ms. Rashmi Sethi
- 6.3 The members shall hold office for a period of three years from the date of nomination. No member shall draw any remuneration, but she/he shall be entitled to reimbursement of any bona-fide expenses incurred for discharging functions of the committee. The nomination may be withdrawn at any point of point at the discretion of the management.
- 6.4 A list of members, as on the date of publication of this Policy, along with their contact details is annexed herewith at Annexure 'A'. Any updates to the said index would be appropriately circulated and made known to all Domino employees through notice from time to time.

**7.0 Redressal Mechanism**

- 7.1 Complaint of Sexual Harassment
  - 7.1.1 The onus of lodging the complaint rests with the person aggrieved and such complaint shall be in writing to the Complaints Committee at the earliest point of time or within 3 months from the date of incident took place. The complaint shall be addressed to the Presiding Officer of the Internal Complaint Committee, at Domino Printech India LLP at 167, Udyog Vihar, Phase-I, Gurgaon-122016 (Haryana), India or sent on the official e-mail id.
  - 7.1.2 The complaint shall contain all the material and relevant details concerning the alleged sexual harassment including the name(s), designation, location of the contravener, date(s) of act(s), time, witnesses if any, etc.
- 7.2 Conducting enquiry by the Complaints Committee
  - 7.2.1 The Complaints Committee shall take immediate necessary action to hold an enquiry maintaining confidentiality. The Committee shall hear the Complainant and her/his statements/version shall be recorded.
  - 7.2.2 The person complained against shall be provided a statement of allegation(s) and an opportunity will be given to her/him to give a written explanation within 4 working days and the Complainant shall be provided with a copy of the same whereupon she/he may submit further information/documents within 4 working days of receipt thereof. The Complaints Committee may also take inputs from the FIFs/any other person as deemed appropriate.
  - 7.2.3 The Complaints Committee shall after examination of the complaint and within 1 month submit its report with recommendations to the Managing Director recommending the punishment/penalty, if any, to be imposed which may include verbal reprimand or disciplinary action including termination of services. The Committee shall keep complete documentation of the complaint, investigation and its report. IC shall ensure that all documents shall also be



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kept securely in the personal files of the Complainant as well as the person complained against.

7.2.4 The Managing Director, upon receipt of the report from the Complaints Committee shall, make the final decision and give necessary instructions in the matter, invariably within 2 weeks.

#### 7.3 Conciliation:

7.3.1 The Internal Committee may, before initiating an inquiry, at the request of the Aggrieved Woman take steps to settle the matter between her and the Respondent. The conciliation shall not be on monetary settlement basis. The settlement terms shall be recorded in writing and forwarded to Presiding Officer. Copies of the same shall be provided to the Aggrieved Woman and the Respondent. Where a settlement has been arrived at, no further inquiry shall be conducted by the Internal Committee.

#### 7.4 Confidentiality:

7.4.1 All parties involved in any Sexual Harassment matter must keep all aspects of the matter confidential. For some offences if the Complainant desires, the IC will be under an obligation to report matters to the police/or file an FIR.

#### 7.5 Time period:

7.5.1 The Internal Committee shall complete the inquiry within a period of 90 days from the date on which the Complaint is lodged.

#### 7.6 Appeal:

7.6.1 It is important to understand that an act of Sexual Harassment may also be a criminal offence. Any person aggrieved from the recommendations made by the committee or non-implementation of such recommendations may prefer an appeal to the appellate authority as per the provisions of the Act within 90 days from the date of decision.

### 8.0 Disciplinary Action

8.1 Where the conduct of an employee amounts to misconduct in employment as per the terms of appointment or as per relevant service rules or policies of the Company, the Company shall initiate appropriate disciplinary action including warning, suspension, termination, etc. depending on the gravity of offence even if no complaint has been made by the victim.

### 9.0 Third Party harassment

9.1 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company and the persons in charge shall take all steps, necessary and reasonable to assist the affected person in terms of support and preventive action.

### 10.0 Annual Report

10.1 The Complaints Committee shall prepare an Annual Report giving a full account of its activities during the previous year and forward a copy thereof to the Chief Executive Officer who shall forward the same to the HR and Remuneration Committee of Directors and to concerned government department, if so specified by law.

### 11.0 Savings

11.1 Nothing contained in this Policy shall prejudice any right available to the employee or prevent any person from seeking any legal remedy under the National Commission for Women Act 1990, Protection of Human Rights Commission Act 1993 or under any other law for the time being in force.



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### 12.0 Criminal Proceedings/ Other Remedies

- 12.1 Where any conduct of the person complained against amounts to a specific offence under the Indian Penal Code or under any other law, the employer may also initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
- 12.2 The employees who are victims of sexual harassment may, in addition to lodging complaint with the Complaints Committee, also seek legal remedies as may be available under the various laws for the time being in force.

### 13.0 Awareness

- 13.1 Awareness about this policy shall be created by emails as well as displaying or notifying the salient features of the policy in a suitable manner and employees will be free to raise issues relating to sexual harassment and the same will be discussed in meetings with the management.

### 14.0 Victims or witnesses

- 14.1 The victims or witnesses shall not be victimized or discriminated against, while dealing with complaints of sexual harassment or thereafter.


### 15.0 False or Frivolous or Malicious Complaints

- 15.1 If it is revealed that the complaint made was false or frivolous or was made with a malicious intent or with the motive of maligning the concerned individual or to settle personal/professional scores, strict action will be taken against such complainant, including termination of service.

### 16.0 Miscellaneous

- 16.1 As and when there is any amendment or modification in the above policy/procedure, the same will be incorporated and duly circulated/displayed at the Notice Board / Company Intranet.
- 16.2 Domino shall in consultation with the IC periodically review the provisions of this Policy and its implementation (taking into account practical problems, if any, faced by the IC and/or Domino in the implementation of this Policy). Domino reserves the right to amend the provisions of this Policy, from time to time, as it deems fit, subject to applicable law.
- 16.3 This Policy will not prejudice any rights available under the Protection of Human Rights Act, 1993, The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or any other legislation.

Bipin Jiwaji Pandit  
Managing Director

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### ANNEXURE A

#### MEMBERS OF INTERNAL COMPLAINT COMMITTEE

1.0	Ms Shalini Raina Presiding Officer, Senior Manager HR, Domino Printech India LLP Email: <a href="mailto:Shalini.raina@dominoindia.com">Shalini.raina@dominoindia.com</a> Mobile Phone: 981 8122 711
2.0	Mr Ashok Kumar Shrimali Member, Assistant Vice President Finance, Domino Printech India LLP Email: <a href="mailto:ashok.shrimali@dominoindia.com">ashok.shrimali@dominoindia.com</a> Mobile Phone: 997 1183 978
3.0	Ms Rashmi Sethi Member, Senior Executive Regulatory & Compliance, Domino Printech India LLP Email: <a href="mailto:rashmi.sethi@dominoindia.com">rashmi.sethi@dominoindia.com</a> Mobile Phone: 971 7149 037
4.0	Ms Saraswati Phogat Member, Advocate Email: <a href="mailto:saraswatiphogat@hotmail.com">saraswatiphogat@hotmail.com</a> Mobile Phone: 981 0302 380



Bipin Jiwaji Pandit  
Managing Director