

TITAN INDUSTRIES LTD.

POLICY AGAINST SEXUAL HARASSMENT

Introduction/ Purpose:

At Titan Industries, 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 are committed to protect the dignity and respect of every individual. 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 the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.

The policy is made under the overall ambit of the Tata Code of Conduct and in accordance with the Supreme Court Guidelines on Sexual Harassment at workplace, declared in *Vishaka & Others. vs. State of Rajasthan & Others.* (AIR 1997 SC 3011).

Who is covered under the Sexual Harassment Policy at Titan?

Titan's "Rules for prevention and redressal of sexual harassment at workplace" is applicable to:

- (i) Every employee across the Company – permanent, temporary, on training and on contract;
- (ii) An alleged act of sexual harassment, whether the incident has occurred during or beyond office hours;
- (iii) An alleged act of sexual harassment, whether sexual harassment has taken place within or outside the company premises.

Any act of sexual behavior is included if such an act is perceived to be detrimental to a healthy and congenial work environment. (Ref note)This policy is only applicable when both or either the alleged harasser & the victim are employees/agents of the company. It is not applicable when both the alleged harasser & the victim are third parties.

Definition of Sexual Harassment

“Sexual Harassment” is any unwelcome sexually determined behavior, such as: physical contact and advances; a demand or request for sexual favors; whether verbal, textual, graphic, electronic or by any other action, sexually colored remarks, showing pornography; and any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

This includes verbal, non-verbal or physical conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds or display of a nature with sexual overtures.. It also includes a demand or request for sexual favors in return for with a promise of work related favors such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition.

Acts of sexual behavior which may arise out of coercion ranging from pressure for personal favors to sexual favor as a 'quid-pro-quo', intrusion into the private lives, etc. or that which may lead to hostile working condition may also be considered as a form of sexual harassment.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

The following are some basic definitions for reference:

Complainant: The person reporting an incident of Sexual Harassment

Victim: The person subjected to Sexual Harassment.

Alleged Harasser: The person who is alleged/reported to have committed an act of Sexual Harassment.

Complaints Committee(s):

In accordance with Supreme Court Guidelines, the Company has formed a Core Complaints Committee and three Zonal Complaints Committees (please see Annexure A for constitution and roles and responsibilities) which will manage the process of enquiry and redressal of sexual harassment complaints.

The location of the Core Complaints Committee and the Zonal Complaints Committees is provided below:

Core Complaints Committee:

Is responsible for Corporate Office at Bangalore, Southern Region, and plant locations at Hosur and Bommasandra, Chickballapur and any issues arising out of

overseas operations, including locations abroad and at subsidiary and associate companies eg Titan Time Products Ltd., Goa.

Complaints Committee West Zone – Is responsible for the Western Region. (RO – West)

Complaints Committee East Zone – Is responsible for the Eastern region. (RO – East)

Complaints Committee North Zone – Is responsible for the Northern region, including manufacturing plants at Dehradun, Baddi, Roorkee and Pantnagar.

Names of the members of the Core Complaints Committee and Zonal Committee along with their contact details are provided in **Annexure B**. The **HR Manager** at a location will periodically update the list of names and contact details of the members.

Whom to contact in case of an incident of sexual harassment?

An employee may send a written complaint either to the Core Complaints Committee or to the Zonal Complaints Committee. The employee may also email the complaint to: ethics@titan.co.in.

The employee may also contact his/her Team Manager, HR Manager, Ethics Counselor or any other employee. Upon being intimated, the Team Manager or the HR Manager or the Ethics Counselor or any other employee shall send an email communication to the Complaints Committee, providing all the necessary details of the Complaint. The Victim must be copied on such emails.

The complaint should include with contact details of the complainant / victim such as name, address, contact number, department etc.

In both the cases above, the written complaint/email must provide the details of the incident together with the name/s of, the alleged harasser/s and the victim/s, as available.

What is the process?

Depending upon the nature of the Complaint, the Core Complaints Committee may direct that an enquiry be conducted by an Investigating Committee constituted by the Core Complaints Committee. The Complaints Committee may not order an enquiry, if examination of witnesses/documents is not necessary to arrive at a conclusion. In either case, the Complaints Committee shall provide an opportunity to the victim as well as the alleged harasser to represent their position and provide their explanations.

The victim and the alleged harasser need to go through the **Guidelines for the Complaints/Investigation Committee** to better understand their rights and the procedure to be adopted by the Complaints/Investigation Committee.

In the event an enquiry is found to be necessary, the following procedure shall be adopted by the Committee:

- An enquiry is initiated through the members of the investigating committee
- Discussions are conducted with the complainant, victim and alleged harasser as required
- Written record of all discussions are to be maintained by the committee
- Inquiry findings are to be submitted to the Core Complaints Committee
- Core Complaints Committee will study findings and present the decision and the recommended action thereon to the CHRO (Chief Human Resources Officer)
- The CHRO will clarify with the complaints committee on the recommendation and will implement the same after informing Chief Ethics Officer and Managing Director
- The Chief Ethics Officer will periodically update the Board Ethics committee

The final decision shall be communicated to the victim and the alleged harasser in the both the instances above. Format of the report is provided (**Annexure C**)

Note:

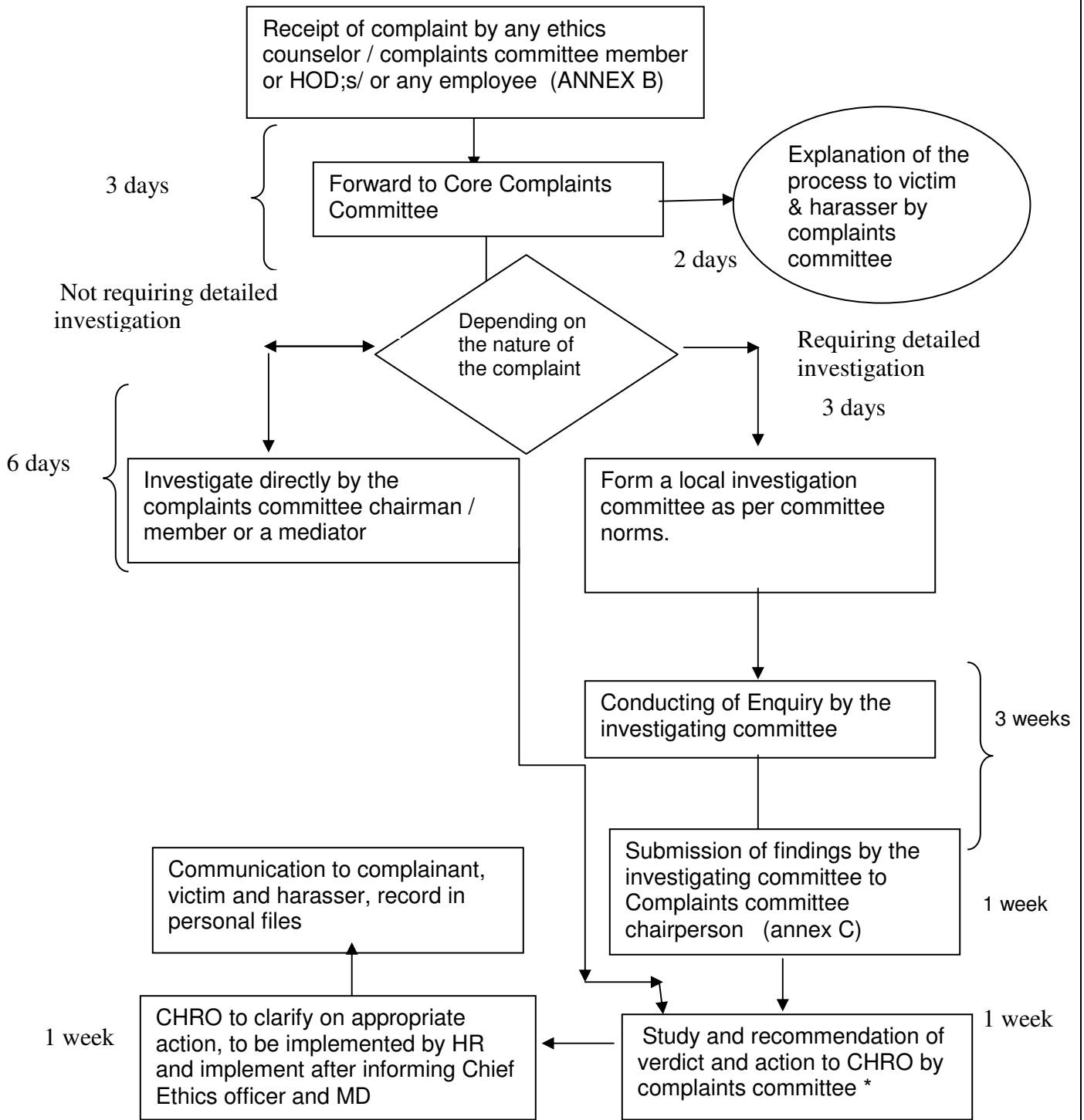
Titan will exercise utmost care in treating the entire process with the dignity, sensitivity and respect it merits including protection of the victim / harassed

Any act of sexual behavior, if noticed by any third party may be brought to the notice of the committee or the management. Such acts may be considered as harassment, if quid pro quo or hostile work environment conditions prevail. Otherwise, it could be treated as non-professional behavior at the workplace and may be dealt with by the company outside the purview of this policy.

The Company will provide counselor services to the victim / harassed on request, at no additional cost to the victim/harassed.

The intent of this policy is to create a harmonious & safe working environment. To ensure that this is upheld in both letter and spirit, we urge Titanians to desist from lodging wrongful allegations.

This would apply to third parties also.



PROCESS FLOW FOR REDRESSAL OF COMPLAINTS WRT SEXUAL HARASSMENT
 * IF THE FINDINGS ARE REJECTED BY COMPLAINTS COMMITTEE THE SAME WILL BE SENT BACK TO INVESTIGATING COMMITTEE TO AMEND AND SEND WITHIN ONE WEEK. DAYS ARE INDICATIVE AND MAY VARY IN SOME CASES DEPENDING ON THE NATURE OF THE CASE

Appeal

If either party desires to appeal the decision he/she may appeal in writing to the MD, who shall decide the appeal within one month

Third party harassment:

Any harassment brought to the notice of the company arising out of an act or omission by any third party or an outsider, Titan will take necessary and reasonable steps in assisting the affected person in terms of support and preventive action.

Victimization/Retaliatory Action:

Every manager or supervisor must contact the Complaints Committee members immediately upon receiving a complaint and must be alert to any possible retaliatory actions. The victim may directly communicate with the members of the Complaints Committee or any other superior officers, in case of any suspected retaliatory action. In case of any possibility of retaliatory action, the Complaints Committee must preferably transfer the alleged harasser or the victim to avoid victimization. The Complaints Committee should make best efforts to protect the interests of the victim from victimization.

Guidelines for the Complaints/ Investigation committee

1. To notify in writing the time and dates of the meetings to be held, to the complainant, victim and the alleged harasser.
2. A copy of the statement of complaint to be given to the alleged harasser with reasonable time to study the same prior to appearing before the committee appointed for this purpose
3. Enquiry to be conducted in a neutral location which provides an environment conducive for both the victim and alleged harasser.
4. Both the parties may be allowed to bring in a colleague for specific advice and support. However, the same shall not be allowed if it causes undue delay or disrupts the committee proceedings
5. Appropriate recordings of each enquiry sitting and observations shall be made by the committee members.
6. During the process of investigation, the Company will ensure no further harassment or victimization happens to either the victim or the alleged harasser and duties are carried out as normal. The Company will also ensure that there is no proximity at work place between the victim and the alleged harasser, during the pendency of the Complaint. Necessary work arrangements, including transfer, if necessary, will be made by the Company for this purpose.
7. The conclusion of the findings and report to be handed over to the chairperson of complaints committee, who will study and communicate the verdict to the CHRO.

8. Conclusion of the findings will also be informed to both the parties concerned.

The above action of receiving, identifying investigation committee, investigations and reporting should be completed within 50 days.

Possible Disciplinary Actions arising out of the Recommendations

1. A letter of warning that will be placed in the personal file of the harasser.
2. Immediate transfer or suspension without pay or both.
3. Fine equivalent to 2-4 months salary that can be credited to a fund created to be utilized for the welfare of the employees.
4. Stoppage of increment with or without cumulative effect.
5. Reduction in rank.
6. Termination/dismissal from the services of the Company.
7. Any other action that the Disciplinary Authority may deem fit.
8. Filing a Complaint before the relevant police station/Court.

Roles and Responsibilities

Employees

Are encouraged to familiarize themselves with the key elements of the policy and should:

- a. Abstain from committing any acts which amount to sexual harassment at the workplace.
- b. Report incidents of sexual harassment without fear or favor.
- c. Create an environment of conduciveness for co-workers to work together without fear of harassment.
- d. Get clarifications from HR / Ethics counselors whenever in doubt.

HOD's and Managers

- a. Provide appropriate working conditions in respect of work, leisure, health and ensure there is no hostile environment in the work place.
- b. Provide appropriate lighting and safety in factory, corridors and other office spaces where employees move about in the course of their working.
- c. Report any complaint or grievance immediately to the concerned authorities.
- d. Ensure there is no retaliation or retribution happening at the workplace where the supposed action is to have taken place.
- e. Implement the disciplinary action along with HR.
- f. Ensure that issues pertaining to sexual harassment are discussed periodically during the meetings. During such meetings, relevant details such as the brief outline of this Policy, the details of the members of the Complaints Committee shall also be discussed.

CHRO / HR Department

- a. Conduct necessary communication and training across the company, with respect to sexual harassment at the workplace.
- b. Ensure this policy is communicated, explained and handed over at the time of induction of every employee.
- c. Any act of sexual harassment to be notified as misconduct under the Standing orders of the company.
- d. Provide sufficient security at the entry as well as the exit points and in cases where women employees are transported from and to the work place working in late shift hours.
- e. Provide appropriate medical and separate rest room facilities for female employees.
- f. Keep separate vehicles ready to meet emergency situations such as hospitalization whenever there is a case of injury or harassment etc.
- g. Clarify to employees on any queries related to this policy along with ethics counselors wherever required.
- h. Maintain records of all the Sexual Harassment cases and findings.

Chief Ethics Officer

- a. Ensure that this policy is communicated through appropriate channels (HR / ethics counselors etc).
- b. Recommend actions to be taken along with Complaints Committee.
- c. Ensure implementation of this policy in line with overall TCOC guidelines.
- d. Ensure appropriate training is provided to members of the Complaints Committee (s) including training on gender sensitivities.
- e. Form the Core Complaints Committee as well as the location committees and hold periodic meetings with them.
- f. Communicate quarterly / or more frequently if required to the Board Ethics committee

CHRO

The CHRO will clarify with the complaints committee on the recommendation and will implement the same after informing Chief Ethics Officer and Managing Director, and also communicating the action to the concerned stakeholders

Managing Director

Consider and dispose of appeals, within a period of thirty (30) days and communicate the decision to the parties concerned.

Power to make rules and Amendments –

The power to make rules pertaining to sexual harassment at workplace vests with the Board of Directors of Titan Industries Ltd. Any changes to these rules shall be suitably communicated to all the employees.

TITAN INDUSTRIES LIMITED

MANAGING DIRECTOR

Date:

Place:

*ANNEXURE A***Constitution and role of Complaints Committee :****(1) Constitution of Complaints Committee**

- (a) The Company shall have a Complaints Committee comprising 7 members.
- (b) The Complaints Committee shall be chaired by a woman of adequately high position. In the event that the perpetrator is senior to the Chairperson of the Complaints Committee, a senior woman officer, who is senior to the perpetrator in rank and post, shall be co-opted as Chairperson for that case. In case there is no senior woman officer available in the workplace, an eminent woman who may not be an employee of the Company, shall be co-opted as Chairperson for that case.
- (c) Not less than half of the members of the Complaints Committee shall be women.
- (d) The Complaints Committee shall appoint/co-opt a nominee from an NGO or any other person who is familiar with the subject of sexual harassment, as a third party member.
- (e) The Complaints Committee established in the Company's office for inquiring into complaints of sexual harassment shall be deemed to be the Inquiring Authority appointed by the Disciplinary Authority and the Complaints Committee shall hold the inquiry in accordance with the procedure laid down in these Rules.
- (f) For any complaints pertaining to other factory locations, Regional or Corporate office, separate Complaints Committee/s may be constituted by the Core Complaints Committee.
- (g) Changes in the constitution of the Complaints Committee, whenever necessary, shall be made as expeditiously as possible and in any case within 15 days of the date of vacancy of office by one of the members.

(2) Functions and Powers of the Complaints Committee. -

- (a) The Complaints Committee shall organize programmes for the gender sensitisation of executives and employees through workshops, seminars, *etc.* It may take the assistance of specialized NGO/Ethics Counsellors, *etc.*, if necessary, for this purpose.
- (b) The Complaints Committee shall meet once a quarter, even if there is no live case, and review preparedness to fulfill all requirements of the Vishaka judgment in the Company.
- (c) The quorum for the purpose of meeting/hearing shall be 2/3rd of the members of the Complaints Committee. However, this shall not be a pre-requisite for the quorum of an adjourned meeting.
- (d) The Chairperson of the Complaints Committee shall have veto power.
- (e) The minutes of every meeting shall be recorded in the Minutes Register maintained for the purpose.
- (f) The Complaints Committee shall have power and jurisdiction as specified in the Tata Code of Conduct 2008 and the Standing Orders of the Company for conducting an inquiry and also have the powers –
 - (i) to summon witnesses and documents;
 - (ii) to recommend transfer and/or suspension;
 - (iii) to recommend penalties as per Service Rules of the company.
 - (iv) the Complaints Committee shall submit its Report to the Disciplinary Authority for further necessary action.

(3) At every Zonal Complaints Committee investigation, a member from the Core Complaints will be present.

(4) The Complaints Committee may form a Complaints Sub-Committee for the purposes of enquiry and investigation.

ANNEXURE B**Complaints Committee and Zonal Complaints Committee – Contact details**

Sl No.	Name	Designation	Location	Contact details (email/mobile no)
Core Complaints committee				
1	Dr. Geetha Ramkumar, Chairperson	Head – Health care	Hosur - Watches	geetharamkumar@titan.co.in 94433 25048
2	Ms. Geetha Devi M P	Advocate	Bangalore	geeth@bgl.vsnl.net.in / mpgdevi@dataone.in 92434 62495
3	C. Srinivasan	Vice President	Bangalore	srinic@titan.co.in 97400 16575
4	H G Raghunath	Senior Vice President	Hosur	raghunathhg@titan.co.in 98452 77131
5	N E Sridhar	Divisional Manager	Bangalore	sridharne@titan.co.in 92434 50116
6	Suparna Mitra	General Manager	Bangalore	suparnam@titan.co.in 99801 34330
7	Latha Padmanabhan	Manager	Chennai	lathap@titan.co.in 92822 16719
Location complaints committee East				
1	Prabha Das Sharma	Manager – Corporate Sales	Kolkata	prabhad@titan.co.in 98304 94155
2	Shibaditya Ghosh	Sr. Manager – Accounts	Kolkata	shibaditya@titan.co.in 98300 09306
Location complaints committee North				
1	Meenu Gupta	Manager Corporate Sales	Delhi	meenu@titan.co.in 98106 97790
2	Rajesh Hariharan	Sr. Manager Accounts	Delhi	hrajesh@titan.co.in 98112 33309
3	T B Singh	Factory Manager	Baddi (HP)	dicky@titan.co.in 92186 52900
4	Seema Tomar	Accounts Manager	Dehradun	seemat@titan.co.in 92195 01241
Location complaints committee West				
1	Clara Lobo	Boutique Incharge	Mumbai	claral@titan.co.in 92243 05681
2	Hemant Deshpande	Sr. Manager Accounts	Mumbai	hemantv@titan.co.in 93228 38097

ANNEXURE C

CHECK LIST / FORMAT FOR REPORTING FINDINGS

Sl No	Item	Notings
1	DATE OF RECEIPT OF COMPLAINT	
2	NAME / CONTACT DETAILS OF COMPLAINANT/VICTIM (S)	
3	DATE / LOCATION OF INCIDENT	
4	BRIEF DESCRIPTION OF COMPLAINT (CAN ENCLOSE THE COMPLAINT DOCUMENT)	
5	NAME / CONTACT DETAILS OF ALLEGED HARASSER (S)	
6	INVESTIGATION COMMITTEE MEMBERS (S)	
7	DATE (S) OF INVESTIGATION – ENTER BEGINNING AND CLOSE DATES	
8	DOCUMENTS REFERRED / VERIFIED / COLLECTED / ENCLOSED	<ol style="list-style-type: none"> 1. STATEMENT FROM VICTIM 2. STATEMENT FROM WITNESSES IF ANY 3. STATEMENT FROM HARASSER (S) 4. ANY OTHER CIRCUMSTANTIAL EVIDENCE
9	ANALYSIS / OBSERVATIONS OF COMMITTEE	
10	CONCLUSION	
11	RECOMMENDATION OF COMMITTEE	

Place and Date :

Name / Designation and Signature of
Committee Members