

ATTERO RECYCLING PVT LTD ANTI - SEXUAL HARASSMENT

POLICY

1.0 SCOPE & EFFECT:

1.1 The Policy is applicable to all employees of Attero Recycling Pvt Ltd (Herein by referred as Attero) and its affiliates operating in India and supersedes the previous Sexual Harassment Policy effective from 01-January-2024.

1.2 The Policy is meant to serve as guidelines for the employees of Attero. Subject to the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Attero reserves right to amend, abrogate, modify, & / or rescind the policy or any part of it at any time.

1.3 This policy is in addition to the Attero Business Conduct Policy on Harassment.

2.0 OBJECTIVES:

2.1 To set out effective measures to avoid & to eliminate & if necessary to impose punishment for any sexual harassment in the workplace.

2.2 To establish Internal Complaints Committees across *Attero's* locations to provide an effective redressal mechanism to aggrieved persons facing sexual harassment at the Attero workplace

3.0. Definitions

'**Sexual Harassment**', includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

- a) physical contact & advances, or
- b) a demand or request for sexual favours, or
- c) sexually coloured remarks, or
- d) showing pornography, or
- e) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

3.2 The term "**Sexual Harassment**" shall also include any of the following circumstances, among other circumstances, if connected with any act or behaviour of sexual harassment:

- a) An implied or explicit promise of preferential treatment in employment, or
- b) An implied or explicit threat of detrimental treatment in employment, or
- c) An implied or explicit threat about present or future employment status, or
- d) interference with work, creating an intimidating or offensive or hostile work environment or

e) humiliating treatment likely to affect health or safety.

3.3 “Workplace” shall include any premises from which *Attero* conducts its business operations in India or any place visited by the employee arising out of or during the course of employment including transportation provided by *Attero* for undertaking such journey and definition of work place contained in section 2(o) of the SHWW Act.

4.0 CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE:

The Board of Directors of the Company shall, from time to time, constitute or re-constitute the ICC, in accordance with the POSH Act.

4.1 Composition

The ICC shall consist of:

- a) A woman employee employed at a senior level at Workplace amongst the employees who shall act as the Presiding Officer (“Presiding Officer”);
- b) Two Employee members, preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- c) One member from amongst non-government organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment; and
- d) It is mandatorily required that one half of the total nominated members in the ICC are women.

The names of the persons who are on the Internal Committee are stated in **Annexure A** and the same shall from time to time, along with contact telephone numbers and other details, be displayed on the notice board of the company.

4.2 Term of the Internal Complaints Committee

The term of the office of Internal Committee will be for a period not exceeding three years and after the expiry of the said period the Company shall reconstitute the internal committee.

4.3 Removal of members of the Internal Committee

If any member or the presiding officer of the Internal Committee—

- a) Discloses information regarding the contents of the complaint, identity and addresses of the aggrieved person, the respondent (against whom the complaint is filed) witnesses, or any matter relating to conciliation and inquiry proceedings, recommendations of the internal committee, action taken by the employer, or
- b) Has been convicted for an offense or an inquiry into an offense under any law is pending against him, or

c) Has been found guilty in any disciplinary proceedings or such proceeding is pending against him, or

d) Has abused his position as to render his continuance in office prejudicial to the public interest,

such a member or the presiding officer shall be removed from the Internal committee and the vacancy or any casual vacancy shall be filled by fresh nomination.

5.0 POWERS AND DUTIES OF THE INTERNAL COMMITTEE:

The Internal committee shall:

a) In each calendar year, prepare an Annual Report containing the number of cases filed and their disposal, in such form as may be prescribed and submit the same to the employer and the district officer.

b) Ensure implementation of this policy.

c) Ensure and supervise proper constitution and functioning of the Internal Committee.

d) Organize regular workshop and training programs.

e) Formulate programs for the spread of awareness of the policy among the management.

f) To bring out publications concerning Sexual harassment and also concerning implementation of this policy

g) Not to disclose information or publicize the content of complaint or inquiry proceedings, except for information regarding justice secured without disclosing the identity of the aggrieved.

6.0 GRIEVANCE REDRESSAL PROCEDURE:

a) Any aggrieved person, may make, in writing, complaint of sexual harassment at workplace to the Internal Committee within a period of three months from the date of the incident or in the case of a series of incidents, within a period of three months from the date of the last incident. The period for filing the complaint may be further extended for reasons to be recorded in writing, if it is satisfied that the circumstances were such which prevented the person from filing a complaint within the said period.

b) Where the aggrieved person is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint.

c) Complaint may be oral or in writing.

d) If the Complaint is oral, the same shall be reduced in writing in detail by the Internal Committee member to whom the complaint is made.

e) The Complainant will be afforded full confidentiality at this stage and contents of the complaint, identity/address of the aggrieved, respondent, any witness, recommendations of

the Internal Committee or actions taken by the employer shall not be published communicated or made known to the press, public or media at any time.

f) Immediately upon receipt of the Complaint, and within not more than two (2) working days, the Member of the Internal Committee to whom the Complaint is made shall communicate the same to the Presiding Officer of the Internal Committee.

g) Within a period of 5 working days from the date of such communication, the Presiding Officer shall convene a meeting of the Internal Committee.

h) The Internal Committee may before initiate an inquiry and at the request of the aggrieved person take steps to settle the matter between her and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation. The inquiry shall be completed within a period of ninety (90) days.

i) Where a settlement has been arrived at under sub-section (h), the Internal committee shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation

j) The Internal Committee shall provide the copies of the settlement as recorded under sub-section (i) to the aggrieved person and the respondent.

k) Where a settlement is arrived at under sub-section (h), no further inquiry shall be conducted by the Internal Committee.

l) The Internal Committee shall examine the complaint and shall undertake investigation of the complaint after giving opportunities to the complainant to present the case and the respondent to submit his version. The Internal Committee may examine the witnesses from both sides and the respondent shall have the opportunity to cross-examine the witnesses.

m) On completion of the inquiry, the Internal Committee shall provide a report of its findings to the employer, within a period of 10 days from the date of completion of the inquiry and this report should be made available to the concerned parties.

n) Internal Committee shall where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent and where no such rules exist, in such manner as may be prescribed.

o) Where the aggrieved person informs the Internal Committee that any term or condition of the settlement arrived at under sub-section (i) has not been complied with by the respondent, the committee shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police.

p) Both the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings of the Internal Committee.

q) For the purpose of making an inquiry under sub-section (h), the Internal committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters: -

- (i) Summoning and enforcing the attendance of any person and examining him on oath.
 - (ii) Requiring the discovery and production of documents; and
 - (iii) Any other matter which may be prescribed.
- r) A suggested format of the complaint is set forth in **Annexure B**

7.0 PROTECTION AGAINST VICTIMISATION:

In the event complainant being an employee and the accused/respondent being his/ her manager, during the pendency of investigation and even after such investigation if the manager is found to be guilty, the accused shall not act as manager of the complainant.

During the pendency of investigation, the Internal Committee may also require the employer to –

- a) transfer the person to another workplace or
- b) grant leave up to a period of 3 months. The leave granted will be in addition to the leave entitled by the aggrieved person, or
- c) such other relief as may be prescribed under law.

8.0 CONSEQUENCE OF COMPLAINT BEING PROVED:

In the event allegations made in the complaint are proved against the employee, the Internal Committee shall recommend to *Attero* management –

- a) To treat, and take action for, sexual harassment as misconduct in accordance with the provisions of the service rules applicable to the respondent.
- b) To deduct from the salary or wages of the respondent such sum, as may be considered appropriate, to be paid to the aggrieved person or her legal heirs.

In determining the sum to be paid, the Internal Committee shall have regard to-

1. The mental trauma, pain, suffering and emotional distress cause to the aggrieved person;
2. The loss in the career opportunity due to the incident;
3. Medical expenses incurred by the victim for physical or psychiatric treatment;
4. The income and financial status of the respondent;
5. Feasibility of such payment in lump sum or in installments.

In case *Attero* is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved person. If the respondent fails to pay the sum referred in clause (c), the Internal committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer. The employer or the District Officer shall act upon the recommendation within sixty (60) days.

8.1 Coverage of other forms of Harassment

In addition to sexual harassment, Attero prohibits all forms of workplace harassment and abuse, including but not limited to physical abuse, verbal abuse, bullying, psychological harassment, intimidation, and humiliating treatment. Such behavior will be treated as misconduct.

The Internal Committee will also ensure implementation, periodic review, and monitoring of this Policy. This includes maintaining records of complaints, resolutions, and training sessions, and submitting reports to the management as prescribed under law.

9.0 MALICIOUS COMPLAINTS

If the Internal Committee finds, after an inquiry, that the complaint is malicious or false, it may recommend to *Attero* management to take action according to the service rules. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

10.0 OBLIGATIONS OF *Attero* MANAGEMENT:

The *Attero* management shall:

- a) Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- b) Include in its report the number of cases filed, if any, and their disposal in *Attero's* Annual Report.
- c) The *Attero* Management shall provide all necessary assistance for the purpose of ensuring full effective and speedy implementation of this policy. Management shall be bound by the decision of the Internal Committee constituted as above and shall implement such decisions in an expeditious manner.
- d) Display at any conspicuous place in the workplace, the penal consequences of sexual harassment and the order constituting the Internal Committee.
- e) Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation programs for the members of the Internal Committee in the manner as may be prescribed.
- f) Provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry.
- g) Assist in securing the attendance of respondent and witnesses before the Internal Committee
- h) Make available such information to the Internal Committee as it may require having regard to the complaint made under sub-section 6(a)
- i) Provide assistance to the person if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.

j) Cause to initiate action under the Indian Penal Code or any other law if the aggrieved person so desires where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place.

k) Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.

l) Monitor the timely submission of reports.

11.0 THIRD PARTY HARASSMENT:

In case of third-party Sexual Harassment, the Internal Committee will actively assist and provide all its resources to the complainant in pursuing the complaint and ensure his/her safety at least in the company's premises.

12.0 CONTACT

In case of any query, support, or complaint in relation to this POSH Policy, please contact:

a) the Presiding Officer, or

b) the HR Manager, or

c) mail at iccnoida@attero.in (for Noida), iccroorkee@attero.in (for Roorkee)

13.0 SAVINGS:

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the accused under any other provision of civil or criminal law.

The provisions of this policy shall not restrict the power of company or complainant to proceed against the alleged offender for any other misconduct or to pursue the criminal or civil remedies.

14.0 MODIFICATION & REVIEW OF THE POLICY:

Attero reserves the right to modify and, or review the provisions of this Policy, so as to comply with applicable legal requirements in India, internal policies, or with a view to fine tune or alter the provisions of this Policy to the extent deemed necessary by *Attero* from time to time.

TIME LINES FOR ACTIVITIES UNDER THE POLICY:

| S. No. | Action Point | Authority/Concerned Person | Time Limit |
|--------|--|--|---|
| 1 | Complaint | Complaint to be lodged by aggrieved woman Before Internal Complaints Committee | i) Within the period of 3 months from the date of the incident, or ii) in case of series of incidents, within the period of 3 months from the date of last incident. |
| 2 | Initiation of Enquiry Proceedings | By the Internal Complaints Committee, by sending the copy of complaint To the Respondent | Within the period of 7 working days of receipt of the complaint |
| 3 | Reply by the Respondent along with his list of documents, names and addresses of witnesses | To the Internal Complaints Committee | Within 10 working days from the day of receipt of the copy of complaint forwarded by ICC. |
| 4 | Completion of Enquiry proceedings | By ICC | Within 3 months from the date of receipt of complaint |
| 5 | Submission of Enquiry Report and Findings along with Recommendations by ICC | To the Management | Within 10 days of completion of Enquiry Proceedings by ICC |
| 6 | Implementation of Recommendations made in the Enquiry Report of ICC | By the Management | Within 60 days of the receipt of the Recommendations made in the Enquiry Report by ICC |
| 7 | Appeal to HR Head or MD | By the aggrieved person | Within a period of 90 days of Recommendations by ICC. |

ANNEXURE A

IC Member Team Noida (iccnoida@attero.in)

| S.No. | Post of Committee Members | Employee Name | Department | Mobile Number | E-mail ID |
|-------|---------------------------|---------------------|---------------------------------|---------------|--|
| 1 | Presiding Officer | Anushree | Sustainability | 8448662689 | anushree@attero.in |
| 2 | Member | Mandeep Singh | Operations | 9810055108 | mandeep@attero.in |
| 3 | Member | Paromita Chatterjee | Strategic Initiatives&Policies | 9999449321 | paromita.chatterjee@attero.in |
| 4 | Member | Deepaa | Human Resource & Administration | 8178766698 | Deepaa@attero.in |
| 5 | External Member | Nivedita Puggal | Posh Consultant | 9899455543 | Nivedita72@yahoo.com |

IC Member Team Roorkee 173 (iccroorkee@attero.in)

| S.No. | Post of Committee Members | Employee Name | Department | Mobile Number | E-mail ID |
|-------|---------------------------|-----------------|----------------------|---------------|--|
| 1 | Presiding Officer | Anushree | Sustainability | 8448662689 | anushree@attero.in |
| 2 | Member | Aman Bhatt | Human Resource | 8937046951 | aman.bhatt@attero.in |
| 3 | Member | Juhi Verma | Business Development | 8954910005 | juhi.verma@attero.in |
| 4 | Member | Vijay Pant | Plant EHS | 9690641340 | vijay.pant@attero.in |
| 5 | External Member | Nivedita Puggal | Posh Consultant | 9899455543 | Nivedita72@yahoo.com |

IC Member Team Roorkee 290 (iccroorkee290@attero.in)

| Location | Post of Committee Members | Employee Name | Department | Mobile Number | E-mail ID |
|------------------|---------------------------|-----------------|----------------------|---------------|--|
| Roorkee (290) | Presiding Officer | Anushree | Sustainability | 8448662689 | anushree@attero.in |
| | Member | Vipin Kumar | Dismantling | 9897199465 | vipin.kumar@attero.in |
| | Member | Shristi Singh | Business Development | 7906877584 | shristi.singh@attero.in |
| | Member | Abhishek Mishra | Operations | 8864980862 | abhishek.mishra@attero.in |
| | External Member | Nivedita Puggal | Posh Consultant | 9899455543 | Nivedita72@yahoo.com |

IC Member Team Pune (icpune@attero.in)

| Location | Post of Committee Members | Employee Name | Department | Mobile Number | E-mail ID |
|----------|---------------------------|-----------------|--------------------|---------------|--|
| Pune | Presiding Officer | Anushree | Sustainability | 8448662689 | anushree@attero.in |
| | Member | Deepak Kumar | Project Operations | 8054804354 | deepak.kumar2@attero.in |
| | Member | Purna Sharma | Digital Marketing | 9205071439 | purna.sharma@attero.in |
| | Member | Shakil Ahmed | Dismantling | 9923766667 | shakil.shekh@attero.in |
| | External Member | Nivedita Puggal | Posh Consultant | 9899455543 | Nivedita72@yahoo.com |

IC Member Team Ringus (iccringus@attero.in)

| Location | Post of Committee Members | Employee Name | Department | Mobile Number | E-mail ID |
|------------------|---------------------------|--------------------|----------------------------------|---------------|--|
| Ringus, Sikar | Presiding Officer | Anushree | Sustainability | 8448662689 | anushree@attero.in |
| | Member | Pradeep | Plant Projects | 7309432902 | pradeep.kumar@attero.in |
| | Member | Rekha Narang | Operations (EPR) | 9999536907 | rekha.narang@attero.in |
| | Member | Rahul Kumar Sharma | Human Resources & Administration | 9667333196 | rahul.sharma@attero.in |
| | External Member | Nivedita Puggal | Posh Consultant | 9899455543 | Nivedita72@yahoo.com |

IC Member Team Greater Noida (icgnoida@attero.in)

| Location | Post of Committee Members | Employee Name | Department | Mobile Number | E-mail ID |
|---------------|---------------------------|-----------------|------------------------|---------------|--|
| Greater Noida | Presiding Officer | Anushree | Sustainability | 8448662689 | anushree@attero.in |
| | Member | Mahesh | Administration | 9015955459 | mahesh.yadav@attero.in |
| | Member | Priya Rana | People & Culture | 7906877584 | priya.rana@attero.in |
| | Member | Amit Kulkarni | Research & Development | 9068999282 | amit.kulkarni@attero.in |
| | External Member | Nivedita Puggal | Posh Consultant | 9899455543 | Nivedita72@yahoo.com |

ANNEXURE B**Complaint form related to sexual harassment at workplace**

| | |
|--|---|
| Name of the affected employee | |
| Designation | |
| Employee No. & Phone No. | |
| Date & Time of Occurrence | |
| Exact nature of incident occurrence | |
| Name of the offender | |
| Designation | |
| Employee No. | |
| Other Details (in case of unknown offender / stranger, etc.) | |
| Name and signature of witness if any | |
| Date | (Signature of the employee) or signature of the third party |
| | Name: |
| | Designation: |
| | Contact Number: |