

WEST COAST PAPER MILLS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

PREAMBLE

West Coast Paper Mills Ltd is an equal employment opportunity Company and it is committed for creating a healthy working environment that enables employees to work without fear prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual Harassment at the work place or other than workplace if involving employees is a grave offence and is, therefore, punishable.

The Supreme Court of India has also directed Companies to lay down guidelines and forum for redressal of grievances related to Sexual Harassment as envisaged in “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The Policy has been formulated keeping in view the provisions under The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act,2013 and its Rules.

SCOPE AND EFFECTIVE DATE

1. This policy extends to all employees of the Company and deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
2. Sexual harassment would mean and include any of the following:
 - i) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards company activity.
 - ii) Unwelcome sexual advances including verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, phone calls. E-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of picture, signs, verbal or non-verbal communication which offends the individual sensibilities and affect her / his performance.
 - iii) Eve teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy.
 - iv) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to other sex.

- v) Conduct of such an act at workplace or outside in relation to any employee of WCPM or vice versa during the course of employment.
 - vi) An unwelcome gesture by an employee having sexual overtones.
3. "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

COMPLAINTS REDRESSAL COMMITTEE

- 1) A Committee has been constituted by the Management to consider and redress complaints of sexual harassment. The Chairman and Members of the Committee are as follows:-

Dr. Priyanka Meesala	Chairperson
Mrs. Anita Radhakrishnan Nair	External Member
Shri Ashok Kumar Sharma	Member
Shri Velu V.	Member - Convener

- 2) A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

REDRESSAL PROCESS

- 1) Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of the occurrence of incident.
- 2) The Committee will maintain a register to endorse the complaint received by it and keeps the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 3) The Committee will hold a meeting with complainant within five days of the receipt of the complaint but not later than a week in any case.
- 4) At the first meeting, the Committee members shall hear the Complainant and record her / his allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material etc.; to substantiate his/her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male for male employees involved shall meet and record the statement.

- 5) Thereafter, the person against whom complaint is made may be called for deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an 'ENQUIRY' shall be conducted and concluded.
- 6) In the event, the complaint does not fall under the purview of sexual harassment, the same would be dropped after recording the reasons thereof.
- 7) In case, the complaint is found to be false the Complainant shall if deemed fit, be liable for appropriate disciplinary action by the Management.

ENQUIRY PROCESS

- 1) The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 2) The Committee shall prepare and handover the statement of allegation to the person against whom complaint is made and give him/her an opportunity to submit a written explanation if he/she so desires within 7 days of receipt of the same.
- 3) The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 4) If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness.es whom they propose to call.
- 5) If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply the original copies of such documents. Similarly, if the person against whom complaint is made, desires to tender any documents in evidence before the Committee he/she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these original copies.
- 6) The Committee shall call upon all witnesses mentioned by both the parties.
- 7) The Committee shall provide every reasonable opportunity to the Complainant and person against whom complaint is made, for putting forward and defending their respective case.
- 8) The Committee shall complete the Enquiry within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Executive Director. The report of the committee shall be treated as an enquiry report on the basis, which any erring employee can be awarded appropriate punishment straightway.

- 9) The Executive Director will direct appropriate action in accordance with the recommendation proposed by the Committee.
- 10) The Committee shall be governed by such rules as may be framed by the Supreme Court Orders or any other legislation enacted from time to time.

OTHER POINTS TO BE CONSIDERED

- 1) The Committee shall recommend to the Executive Director for action, which may include transfer or any other appropriate disciplinary action.
- 2) The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 3) Where sexual harassment occurs as a result of an act or omission by any third party or outsider, WCPM shall take all steps necessary and reasonable to assist the affect person in terms of support and preventive action.
- 4) The Committee shall analyze and put up reports on all complaints of this nature at the end of the year for submission to Executive Director.
- 5) In case the Committee finds the degree of offense coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

The Policy has been approved by the Board of Directors as on 27th May,2026 and substitutes the existing policy dated 19.05.2023. The validity of the Policy is for a period of three years w.e.f. 27th May, 2026.