

Policy on Sexual Harassment

1. Objective: MCPL has a 'zero-tolerance' approach to any instance of sexual harassment, MCPL is committed to provide a safe and productive work environment that promotes the confidence to work, to innovate and to perform without fear of any type of harassment.

By this policy MCPL provides effective resolution for any instance sexual harassment. Its objective is to prevent / deter the commission of acts of sexual harassment at workplace.

2. Applicability: This policy is applicable to every 'employee' of MCPL and any other company / entity acquired and/or in the process of acquisition by MCPL, employed at a work place for any work on regular, temporary, ad hoc, either directly or indirectly or through an agent including contractor, advisers, consultants and visitors and also includes any places visited by the employee arising out of and during the course of employment including the transportation provided by the Company. This policy is put in place in MCPL as required under the Sexual Harassment of Women at Work Place (Prevention, Prohibition and Redressal) Act, 2013 and hence applies to harassment against women only.

3. Definition: '**Aggrieved Person**' means in relation to a workplace, of any age, gender whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. '**Employee**' means a person employed at a work place for any work on regular, temporary, ad hoc or daily wage basis, either directly or indirectly or through an agent, including a contractor, with or, without the knowledge of the principle employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentices or called by any other such name. '**Employer**' means head of Function. '**Company**' means MCPL and any other Company / entity acquired and/or in the process of acquisition by MCPL. '**Internal Complaints Committee/ICC**' means a committee constituted by Company as per this policy. '**Respondent**' means a person against whom the aggrieved person has made a complaint. '**Sexual Harassment**' includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) like physical contact and advances or a demand or request for sexual favours or making sexually coloured remarks or showing pornography or any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

4. Circumstances also constituted sexual harassment: Implied or explicit promise of preferential treatment in her employment or implied or explicit threat of detrimental treatment in her employment or implied or explicit threat about her present or future employment status or interference with her work or creating an intimidating or offensive or hostile work environment for her or humiliating treatment likely to affect her health or safety.

5. Internal Complaints Committee: Internal Complaints Committee (ICC) has been constituted by the management and consist of 4 members [one including the Presiding Officer who is a woman] out of which 1 member shall be an external person who is familiar with the issues of sexual harassment or a resource from an NGO nominated by the management from time to time. The members of the ICC nominated by MCPL are provided as:-

Name of the person	Designation
Mrs. Prabha Bolinjar	Presiding Officer
Mrs. Rita Bhatia	Member
Mr. Yogesh Vaghela	Member
Mr. Dhansukh Bhandari	Member

Any change in the member/s shall be notified by the Management accordingly.

6. Manner of making a complaint: An aggrieved person may make a Complaint in writing to any of the members of the ICC within a period of 3 months from the date of the incident and in case of a series of incidents within a period of 3 months from the date of last incident. In case the aggrieved person employee is unable to make a complaint in writing then ICC can help them to make a complaint in writing or in case the aggrieved person is unable to make a written complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person can make a complaint to the ICC.

7. Manner of Inquiry/Action: The ICC can request the aggrieved party and the respondent to settle the matter through conciliation before initiating an inquiry. However no monetary settlement shall be made by the respondent on basis of the conciliation. The ICC shall have a right to pass an ex-parte order if the respondent or the aggrieved party remains absent for three (03) sequential hearings without giving ICC sufficient cause and prior notice of 15 days. Neither the aggrieved party nor the respondent shall be allowed to represent with their lawyers by the ICC during the pendency of a complaint. The ICC shall complete the inquiry within a period of 90 days from the date of receipt of the complaint and report its findings with recommendations in accordance with the provisions of the services rules/disciplinary action for misconduct within 10 days from the date of completion of the inquiry to the Employer. Employer shall further act to implement the recommendations of the ICC within 60 days from the date of receipt of the recommendations from ICC.

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8. Appeal: An aggrieved party to the complaint may appeal to the Court or tribunal within 90 days from the date of recommendation from the ICC.

9. Action for false or malicious complaint or false evidence: Any complaint on sexual harassment lodged by any employee shall be taken up with utmost priority by the Company. Where the ICC arrives at a conclusion that the allegation against the respondent is made with malicious intent or the aggrieved person produced any forged or misleading documents to prove her case, the ICC may recommend the employer to take disciplinary action in accordance with provisions of the service rules towards misconduct.

10. Confidentiality: All or any information received in relation to the complaint lodged by the aggrieved person or any person providing information in relation to the complaint lodged shall be kept confidential. Any person (including witness) who breaches confidentiality shall be subject to disciplinary action by the employer.

11. Protection against retaliation: No unfair treatment will be meted out to the aggrieved person lodging the complaint with ICC in good faith and shall be protected from any form of retaliation. While dealing with complaints of sexual harassment, the ICC/Employer shall ensure that the aggrieved women/complainant or the witness are not victimized or discriminated against by the respondent. Any act of retaliation shall itself be treated by the Company as violation of this policy and service rules of the Company and could result in disciplinary action up to and including discharge. This protection also extends to anyone providing information in relation to an investigation.

Let us work fearlessly!

Yours Sincerely,

A handwritten signature in blue ink that reads 'Jay G. Modi'. The signature is written in a cursive, flowing style.

Jay G. Modi
Director