

## PTC India Ltd

PTC India Limited being an equal opportunity employer, a policy on Prevention, Prohibition & Redressal of Sexual harassment of women at workplace has been formulated.

### PREAMBLE

PTC India Ltd. (**PTC**) and its group companies namely PTC Financial Services Ltd. (**PFSL**) and PTC Energy Limited (**PEL**) are equal employment opportunity employers and are committed to creating a healthy working environment that enables the employees to work without fear of prejudice, gender bias/discrimination and sexual harassment.

Gender discrimination and sexual harassment violate fundamental rights of a woman. The right of a woman to equality, a life of dignity, the right to practice any profession/occupation and the right of a safe environment are to be provided and guarded as mandated by the Constitution of India.

The PTC group deems it necessary that a policy be placed in order to promote gender sensitization, prevention and protection against sexual harassment and providing for a fair redressal process in case of any inappropriate conduct in its office precincts or any other matter connected or incidental to sexual harassment.

This policy has been framed as a comprehensive code for prevention of sexual harassment at PTC group companies and for redressal of any complaint that may be lodged. Following “The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act 2013” mandate for all employers, PTC group has constituted a committee to be known as “Internal Complaints Committee”

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### Fact sheet

#### Scope & Effective date

- This policy extends to **all PTC group employees** covering any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as Consultants.
- Effective from the date of issue

#### Defining Sexual Harassment

Sexual Harassment will include any or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for
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employment, promotion, examination or evaluation of a person towards any company activity;

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- Eve teasing, innuendos and taunts, physical confinement against one's will and any act likely to intrude upon one's privacy;
- Any unwelcome gesture by an employee having sexual overtones

#### **Internal Complaints Committee (ICC)**

- The Chairman of PTC group has constituted an Internal Complaints Committee to fulfill an important function of sensitizing the employees to gender issues ; and
- To address any complaints made with regard to sexual harassment at the PTC group of companies

#### **Constitution of Internal Complaints Committee (ICC)**

Presiding Officer: Ms. Rashmi Vaid  
Member PTC: Mr. Rajiv Malhotra  
Member PFS: Ms. Sakshi Sharma  
Member PEL: Mr. Shashank Gupta  
External Member: Ms. Prerna Singh

#### **ICC Regulations**

- The Presiding Officer and every member of the ICC shall hold office for such period, not exceeding 3 years, from the date of their nomination as specified by the Chairman
- The external member shall be paid such fees or allowances for holding the proceedings of the ICC as may be prescribed
- The Presiding officer or any member of the ICC can be removed from the Committee if they are found guilty of any acts or offences as mentioned in the " Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013", and the vacancy so created or any vacancy created by resignation/death of any member of the Committee shall be filled by fresh nomination immediately in accordance with the provision of this policy

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**Process: Complaints & Redressal**  
**Route 1: Conciliation**

- Any aggrieved woman may file a written complaint regarding and act amounting to sexual harassment at workplace to 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 the last incident.  
The ICC can extend the time limit not exceeding 3 months, if it is satisfied that the circumstances were such that they prevented the woman from filing the complaint within the said period.
- The ICC shall record and maintain the complaints received
- The ICC, before initiating an enquiry, and at the request of the aggrieved woman, may take steps to settle the matter between her and the respondent through conciliation
- Where settlement has been arrived at, the ICC shall record the proceedings and forward the same to the Chairman
- A copy of the settlement shall be provided to the aggrieved woman and the respondent
- Where a settlement is arrived at, no further enquiry shall be conducted by the ICC
- The ICC shall submit a quarterly report to the Chairman in respect of all complaints received and action taken

**Process: Complaints & Redressal**  
**Route 2: Inquiry**

- On receiving a complaint the ICC shall conduct an enquiry and shall hear and record the statements of the aggrieved woman, the Respondent and any other person the said parties wish to be examined and also ask the aggrieved woman and the respondent to submit any evidence, documentary or otherwise to corroborate their allegations or defense
- The enquiry by the Internal Committee shall be completed within a period of 90 days from date of receipt of complaint by the committee
- If the ICC upon consideration of the material and the report arrives at a conclusion that the allegations against the Respondent are proved, it shall recommend consequential action to the Chairman that may be appropriate and necessary for putting an end to the sexual harassment within 30 days of the submission of the report. The Committee shall recommend to the Chairman:
  - a) To take action for sexual harassment as misconduct in accordance with the provisions of the service rules applicable to the Respondent
  - b) To deduct , notwithstanding anything in the service rule applicable to the respondent, from the salary or wages of the Respondent such sum as may be considered appropriate to be paid to the aggrieved woman taking into consideration:
    - i. The mental trauma, pain, suffering and

emotional distress caused to the aggrieved woman;

- ii. The loss in career opportunity due to incidence of sexual harassment;
  - iii. Medical expenses incurred, if any, by the victim for physical or psychiatric treatment;
  - iv. Income and financial status of the Respondent
  - v. Feasibility of payment in lump sum or in installments
- c) Where the ICC arrives at a conclusion that the allegations against the respondent have not been proved, it shall recommend to the chairman that no action is required to be taken in the matter. Simultaneously, if the ICC arrives at a conclusion that the allegation and the complaint is false, it can recommend to the Chairman for appropriate disciplinary action against the complainant

**Informing Police authorities**

- If the ICC arrives at a conclusion that prima facie a case of sexual harassment is proved and no settlement/conciliation has been arrived at, it shall recommend to the Chairman within 7 days of its findings to report the matter to the Police for appropriate action

**Confidentiality**

- The contents of the complaints made under the present policy, the identity and address of the aggrieved woman, respondent and witnesses, any information relating to the inquiry proceedings, recommendation of the Internal Committee and the action taken shall not be published, communicated or made known to the public, press or media in any manner
- However, upon the Respondent being found guilty, information may be disseminated regarding the justice secured to any victim of sexual harassment under this policy without disclosing the name, address, identity or any particulars that may lead to the identification of the aggrieved woman and witnesses

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