



TOLANI SHIPPING COMPANY LIMITED

ANTI-SEXUAL HARASSMENT POLICY

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<p>1. POLICY STATEMENT</p>	<p>We, at Tolani Shipping Company Limited are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensure ethical conduct at all levels is promoted across our value chain. It is thus in acknowledgment of and consonance with these values, that we are dedicated to ensuring that the work environment is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Institution. We also strive to guarantee a safe and welcoming environment to all those who visit our workplace in any capacity, such as customers, vendors, visiting faculty, etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Institution do not engage in practices that are abusive in any form or manner whatsoever.</p> <p>The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment.</p> <p>Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy.</p> <p>Violation of this policy will call for strict disciplinary action up to and including termination.</p>
<p>2. APPLICABILITY</p>	<p>This policy will extend to all associates of the Institution including those employed on contractual basis. The policy also extends to those who are not associates of the Institution, such as customers, visitors, visiting faculty, etc. but are subjected to sexual harassment at the Premises (defined hereinafter) of the Institution.</p>
<p>3. SCOPE</p>	<p>The scope of the Policy is restricted to the following for all associates:</p> <ul style="list-style-type: none"> i. Work locations of the Institution ii. Any external location visited by associates due to or during the course of their employment with the Institution such as work locations of other Companies/entities, guest houses, etc. iii. Any mode of transport provided by the Institution (or a representative of the Institution) for undertaking a journey to and from the aforementioned locations. <p>Without any prejudice to the rights of an associate in relation to the above the scope includes, any complaint raised specifically by an associate of the Institution due to being subjected to any act of sexual harassment by another associate of the Institution.</p> <ul style="list-style-type: none"> i. At any location, including but not limited to the private residences of the aggrieved associate, Or ii. In any mode of transport

4. DEFINITIONS	<p>“Sexual harassment” includes any unwelcome sexually determined behavior (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome “sexually determined behavior” (physical, verbal or non-verbal conduct) of a sexual nature.</p> <p>“Sexual Harassment” would also mean:</p> <ol style="list-style-type: none"> i. Quid pro quo sexual harassment, which means something in return or an exchange of one thing for another. <ul style="list-style-type: none"> • In the workplace, quid pro quo sexual harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening an associate if he/she does not consent to such sexual advances or favors also amounts to sexual harassment. The act of ‘asking’ may either be verbal or implied and the ‘sexual conduct’ may be verbal or physical. But in either case, it must be unwelcome • For eg: Direct or implied requests or offers by any associate for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increase, promotions, increased benefits, or continued employment constitutes sexual harassment. ii. Hostile work environment includes: <ul style="list-style-type: none"> • Hostile environment sexual harassment occurs when either speech or conduct of a sexual nature takes place, and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more associates • Hostile environment sexual harassment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals • It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim. <p>This is only an indicative list of the possible acts which could be treated as sexual harassment and is in no way intended to be construed as an exhaustive list.</p> <p>In countries where local laws / regulations have clearly defined ‘sexual harassment’ and procedure to address any complaint relating to it, the interpretation of ‘sexual harassment’ & the investigation procedure shall be guided in accordance with the local laws / regulations as applicable.</p>
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5. PREVENTION ACTION	The Institution will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies and other relevant information to all associates, including to all new joiners.
6. REDRESSAL COMMITTEE	<p>The Institution will have a redressal committee to specifically address any complaints of sexual harassment. The nomination of members of the Committee shall be made by the Institution. The Committee will be headed by a woman associate employed at a senior level. Not less than half of the members would be women and the committee would also include, a member from a NGO or Association committed to the cause of Women or a person familiar with the issues relating to sexual harassment, and not less than two members from amongst employees of the Institution who have experience in social work or have legal knowledge.</p> <p>In addition to handling complaints of sexual harassment, the committees will also co-ordinate preventive activities to create a sexual harassment free atmosphere via:</p> <ul style="list-style-type: none"> • Common info mailers • Floating Articles on the same, from time to time <p>The committee members and reporting managers will be provided necessary training inputs to handle such issues effectively and with the required sensitivity and concern.</p>
7. PROCEDURE FOR DEALING WITH COMPLAINTS	<p>7.1 FILING OF A COMPLAINT</p> <p>If any associate believes that (s)/he has been subjected to sexual harassment, such person may file a complaint with any member of the committee or send an email to shivani@tolanigroup.com/esmi@tolanigroup.com.</p> <p>The committee member on receiving a complaint will intimate the committee head. The committee head would arrange for a meeting within one week of receipt of the complaint for discussing the complaint raised.</p> <p>Complaints must be brought within 3 months of the incident of Sexual Harassment and within 180 calendar days in respect of Ex-Associates of the Company.</p> <p>Complaints brought after that time period will not be pursued except under extraordinary circumstances. The determination of whether the complaint was timely or whether extraordinary circumstances exist to extend the complaint period must be made in conjunction with the Legal Team.</p>

Every attempt will be made to get the Complainant to provide the complaint in writing. The complaint shall include:

- the circumstances giving rise to the complaint,
- the dates of the alleged occurrences,
- supporting documents, if any
- names of witnesses, if any, and
- shall be signed by the Complainant

Complaints made anonymously or by a third party must also be investigated to the extent possible.

Where the aggrieved associate is unable to make a complaint on account of her/his physical or mental incapacity or death or otherwise, her/his legal heir or such other person as may be prescribed may make a complaint within 3 months of the incident.

If the complaint does not rise to the level of sexual harassment, the Committee may determine to dismiss the complaint without further investigation after consultation with Legal Team.

7.2 PROCESS OF ENQUIRY

- The Committee will ask the complainant to prepare a detailed statement of incidents/allegation. The statement of allegations will be shared with the respondent within 7 working days of receipt of the complaint.
- The respondent will be asked to prepare a response to the statement of allegations and submit to the Committee within 10 working days from the date of receipt of the allegations, along with list of documents, names and addresses of witnesses, if any.
- The statements and other evidence obtained in the inquiry process will be considered confidential.
- The Committee will organize verbal hearings with the complainant and the respondent.
- The Committee will take testimonies of other relevant persons and review the evidence wherever necessary. The committee should ensure that sufficient care is taken to avoid any retaliation against the witnesses.
- During the inquiry process, the complainant and the respondent would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
- The committee will conduct inquiry in accordance with the practices of natural justice, i.e. the Complainant will be offered to the respondent for cross-examination and vice versa.
- The Committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidence and relevant statements.

- The Committee will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint:
 - (i) Both parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents;
 - (ii) Upon completion of the investigation, both parties will be informed of the results of the investigation.
- The committee will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the committee will also have the discretion to make appropriate interim recommendation in relation to a respondent person (pending the outcome of a complaint) including suspension, transfer, leave, change of work location, etc.
- The committee during such investigation may exercise the power of a civil court, vested in it, in respect of:
 - a. summoning and enforcing the attendance of any person and examining him under oath;
 - b. requiring discover and production of documents;
 - c. any other prescribed matter.
- The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.
- The committee will investigate and prepare an enquiry report with recommendations within 12 weeks.
- The committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
- The committee may before initiating an inquiry, and at the request of the complainant, attempt to settle the matter through conciliation. However, the committee shall ensure that:
 - a. monetary settlement will not be made as a basis of conciliation.
 - b. where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

Where a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the committee.

7.3 DECISION AND ACTION

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that harassment has occurred, prompt, remedial action will be taken.

	<p>The Committee will share the investigation details and the findings thereof with the appropriate functional Head and the senior management of the Institution, and agree on the applicable disciplinary action. This may include some or all of the following:</p> <ul style="list-style-type: none"> • Restore any lost terms, conditions or benefits of employment to the complainant. • Discipline the respondent. This discipline can include demotion, suspension, and termination. <p>The disciplinary action will be carried out by the HR department in consultation with the senior management. Such disciplinary action may even include transfer, demotion or termination. All related documents will be maintained in the associate's folder, ensuring confidentiality.</p> <p>This anti-sexual harassment policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.</p> <p>The Chairperson will share the details of all complaints received and redressed with the Corporate Ombudsman on a quarterly basis.</p> <p>As per the "Provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013", the employer shall include in its report the number of cases filed, if any, and their disposal under this act in the Annual report of the Institution or where no such report is required to be prepared, intimate such number of cases, if any, to the district officer."</p>																		
8. SEXUAL HARRASMENT AND CLIENT/PARTNERS	The Institution encourages its client/partners to have a commitment to a sexual harassment free working atmosphere. The Institution may play a facilitating role in redressal of complaints of sexual harassment in such circumstances.																		
9. POLICY IMPLEMENTATION AND REVIEW	The policy will be implemented and reviewed by the Legal department. The Institution reserves the right to amend, abrogate, modify, and rescind/reinstate the entire policy or any part of it at any time.																		
10. DOCUMENT HISTORY	<table border="1"> <thead> <tr> <th data-bbox="493 1518 610 1591">Version</th> <th data-bbox="610 1518 769 1591">Date</th> <th data-bbox="769 1518 928 1591">Author (Function)</th> <th data-bbox="928 1518 1088 1591">Reviewed by</th> <th data-bbox="1088 1518 1263 1591">Approved by</th> <th data-bbox="1263 1518 1424 1591">Nature of changes</th> </tr> </thead> <tbody> <tr> <td data-bbox="493 1591 610 1698">Issue</td> <td data-bbox="610 1591 769 1698">16.08.2019</td> <td data-bbox="769 1591 928 1698">Legal</td> <td data-bbox="928 1591 1088 1698">Function Head</td> <td data-bbox="1088 1591 1263 1698">Function Head</td> <td data-bbox="1263 1591 1424 1698">First Integrated Issue</td> </tr> <tr> <td data-bbox="493 1698 610 1768">V1</td> <td data-bbox="610 1698 769 1768">30.03.2026</td> <td data-bbox="769 1698 928 1768">Secretarial</td> <td data-bbox="928 1698 1088 1768">Department Head</td> <td data-bbox="1088 1698 1263 1768">Department Head</td> <td data-bbox="1263 1698 1424 1768">Change in e-mail Id</td> </tr> </tbody> </table>	Version	Date	Author (Function)	Reviewed by	Approved by	Nature of changes	Issue	16.08.2019	Legal	Function Head	Function Head	First Integrated Issue	V1	30.03.2026	Secretarial	Department Head	Department Head	Change in e-mail Id
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ANNEXURES

ANNEXURE I – RESPONSIBILITY OF ASSOCIATES

The below is only an indicative list of basic Do's and Don'ts and is in no way intended to be construed as an exhaustive list.

Do's

- Know Company's Anti-Sexual Harassment Policy
- Be aware of inappropriate behaviors and avoid the same
- Say "NO" if asked to go to places, do things or participate in situations that make you uncomfortable.
- Trust your instincts. Walk away from uncomfortable situations.
- Say "NO" to offensive behavior as soon as it occurs.
- Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this policy.
- Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.

Don'ts

Verbal harassment:

- Sexually suggestive comments or comments on physical attributes.
- Offensive language that insults or demeans a colleague, using terms of endearment.
- Singing or humming vulgar songs.
- Requests for sexual favors, sexual advances, coerced acts of a sexual nature.
- Requests for dates or repeated pressure for social contact
- Discussing sexual activities, sexual prowess or intruding on the privacy of an associate.
- Sexually colored propositions, insults or threats.
- Graffiti in the office premises.

Non-verbal harassment:

- Offensive gestures, staring, leering or whistling with the intention to discomfort another.
- Even if not directly done to a particular individual, uttering a word, making a gesture or exhibiting any object with the intention that such word, gesture, or object be heard or seen by associates.
- Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars or derogatory written materials at one's workplace.
- Showing or mailing pornographic posters, Internet sites, cartoons, drawings.
- Suggestive letters, phone calls, SMS, electronic instant messaging or e-mail messages.

Physical harassment:

- Physical contact or advances.
- Intentional touching of the body, e.g. Hugs, kisses, brushing, fondling, pinching, etc. that make others uncomfortable.
- Any displays of affection that make others uncomfortable or are inappropriate at the workplace.

ANNEXURE II – GUIDELINES FOR REDRESSAL COMMITTEE

Role of the Committee:

- Review the complainant's complaint in a fair and objective manner
- Help the complainant and the respondent find a way of solving the problem
- Determine the facts of the case with the individuals concerned and the witnesses, if any and prepare a report with the findings
- Be bound in the principle of natural justice and be unbiased in their evaluation

Conciliation:

- The Committee before initiating an inquiry, at the request of the complainant should take steps to settle the matter between the complainant and the respondent through conciliation provided that no monetary settlement shall be made as a basis of conciliation.
- Where a settlement has been arrived, the Committee shall record the settlement so arrived and forward the same to the senior management to take action as specified in the recommendation
- The Committee shall provide the copies of the settlement as recorded to the complainant and the respondent
- Where a settlement is arrived, no further inquiry shall be conducted by the Committee

Procedure for dealing with complaints: Refer to clause 7.2 on Process of Enquiry as stated above.

General Instructions:

- Any information relating to conciliation and inquiry proceedings, recommendations of the Committee and the action taken shall not be published, communicated or made known to the public, press/media in any manner.
- Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken, contravenes, he/she shall be liable for action as per the Institution's disciplinary policy.

Committee Members: The committee members are listed on the Institution intranet.