



Prevention of Sexual Harassment of Women at Workplace Policy

Dodla Dairy Limited

CIN: L15209TG1995PLC020324

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1. OBJECTIVE

Dodla Dairy is committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment.

This policy takes complete cognizance of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and its rules amended from time to time.

2. SCOPE

This policy applies to all categories of employees of the Company, including permanent, temporary, trainees, and employees on a contract basis working at various locations.

It also extends to business stakeholders viz., Customers, vendors, partners and visitors who are dealing with our employees in the course of business activities. The Policy coverage is not only limited to geographical locations viz. Company's plants/ CCs/ Sales offices / Corporate office but also includes all such places or locations where acts are conducted in context of working relationship.

3. DEFINITIONS

- a) **"Aggrieved Woman"** means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment.
- b) **"Complainant"** is any aggrieved woman who makes a complaint alleging sexual harassment under this policy.
- c) **"Company"** means Dodla Dairy Limited.
- d) **"Employee"** means a person employed with the Company for any work on regular,

temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal 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, apprentice or called by any other such name.

- e) **"Internal Committee"** means and include an Internal Complaints Committee (hereinafter referred to as the "Committee").
- f) **"Member"** means a member of the Internal Committee.
- g) **"Parties"** means collectively the complainant and the respondent.
- h) **"Policy or "This Policy"** means, the Anti Sexual Harassment Policy.
- i) **"Presiding Officer"** means the presiding officer of the Committee and shall be a woman employed at a senior level at the Workplace amongst the Employees.
- j) **"Sexual Harassment"** this policy has defined Sexual antithetical to include any one or more of the following incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes but not limited to:
 - ❖ Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
 - ❖ Physical contact and advances
 - ❖ Demand or request for sexual favours
 - ❖ Sexually coloured remarks, including but not limited to vulgar/indecent jokes, letters, phonecalls, text messages, e-mails, gestures etc.
 - ❖ Showing pornography or the likes
 - ❖ Display of pictures, signs etc. with sexual nature / connotation / overtones in the workplace and work related area.
 - ❖ Teasing, Voyeurism and taunts, physical confinement.

Further the following circumstances, among other circumstances, if it occurs or is

present in relation to connected with any act or behavior of sexual harassment may amount to sexual harassment:

- ❖ Implied or explicit promise of preferential treatment in the employment
- ❖ Implied or explicit threat or detrimental treatment in the employment
- ❖ Implied or explicit threat about present or future employment status
- ❖ Interference with work or creating an intimidating or offensive or hostile work environment
- ❖ Humiliating treatment is likely to affect health or safety.
- ❖ An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

k) **“Workplace”** means and includes all Plants, CCs, CMCs, Sales Offices, Corporate office or other premises where the Company’s business is conducted or places visited by the employee arising out of or during the course of employment including official events, transportation, and accommodation provided by the employer for undertaking such journey.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

5. COMPLAINT MECHANISM

5.1 An appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

5.2 Any aggrieved employee who is subjected to sexual harassment directly or indirectly may submit a complaint of the alleged incident to any member of the Presiding Officer or any member of the Committee in writing with his/her signature within 3 (three) months of occurrence of incident.

5.3 Provided that where such a complaint cannot be made in writing, presiding officer or any member of the Committee, who shall render all reasonable assistance to him/her for making the complaint in writing. Provided further that the Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented him/her from filing a complaint within the said period.

5.4 The format in which the complaint is required to be made is annexed as **Annexure II** to this Policy. This form will be available with the Committee and Human Resource Department of the Company.

6. COMPLAINT REDRESSAL COMMITTEE/ INTERNAL COMPLAINTS COMMITTEE

6.1 The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment

6.2 Dodla Dairy having situated in multiple locations, the Location Internal Complaints Committees (Location-ICC) have three members are constituted at all Units/Offices. The ICC consists of one female member, one male member and is headed by a female employee as the Presiding Officer. Complaints across all the locations other than Corporate office shall be resolved by the ICC as per the procedure laid down in **Level –I**.

6.3 Corporate Internal Complaints Committees (Corporate-ICC) is constituted with seven members i.e., three Female employees as members, two Male employees as members and the Presiding Officer of the Committee shall be a Senior Female Employee. Also, a Female from the NGO shall be appointed as a member in Corporate ICC. at Corporate Office of Dodla Dairy shall co-ordinate with all the locations ICCs. The Corporate Committee shall resolve the complaints as per the procedure laid down in **Level—II**.

6.4 A Quorum of three members is required to be present for the proceedings to be conducted in the Committee. The Quorum shall include the Chairperson, at least two members, out of which one Member shall be a woman.

6.5 No person who is a complainant, witness, or defendant in the complaint of sexual harassment shall be a member of a Committee.

6.6 In case the Presiding Officer is unavailable, the committee shall elect one of the committee members as the presiding officer of the committee.

7. COMPLAINT, ENQUIRY AND REDRESSAL PROCESS

Level – I

- ❖ Any woman employee who would like to submit a complaint against sexual antithetical situation shall report to her immediate Reporting Authority or Presiding Officer or member of the ICC in a written form as mentioned above. If the complaint is against her reporting Authority, she shall submit her complaint to the Presiding Officer of the Corporate ICC or member of the Corporate ICC directly.
- ❖ The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 3 working days from receipt of the complaint.
- ❖ The Presiding Officer of the location ICC shall escalate the unresolved complaints to the Presiding Officer of the Corporate ICC at Corporate Office within 3 working days.
- ❖ The location ICC shall also encourage women employees for suggestions pertaining to their privacy, working environment and shall be rewarded who shall come up with useful and implementable suggestions.
- ❖ In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

Level –II

- ❖ The presiding Officer of Corporate ICC shall take cognizance of the complaint and initiate remedial measures. The Presiding Officer of Corporate ICC shall initiate

conciliation process to settle the complaint if the complaint is not settled at the ICC Level.

- ❖ If Corporate ICC is of the opinion that the nature of the complaint is to be examined with an external agency the committee shall take it forward under the guidance of the respective Plant Manager /Regional HR within 3 working days.
- ❖ The Corporate Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
- ❖ Corporate ICC has sole responsibility to extend facilities/ Protection to the aggrieved and members of the location ICC's
- ❖ The Corporate ICC is required to complete the enquiry within a period of six working days and submit a report to the Head – HR & Admin.
- ❖ The Complaint shall be thoroughly investigated by the Corporate ICC and recommend the disciplinary action as deemed fit.
- ❖ Corporate ICC shall review the location ICC's working on quarterly basis or as and when required.
- ❖ The Corporate ICC shall conduct annual meetings with all location ICC presiding officers and members for their valuable suggestions for maintaining congenial environment at locations with respect to this policy.
- ❖ Location ICC-Presiding officer shall ensure timely submission of reports of location ICC's to Head – HR& Admin.
- ❖ In case of any serious situation or emergency at the location, the Presiding officer of the location ICC shall immediately bring to the knowledge of the presiding officer of the Corporate ICC for immediate Action.
- ❖ The members and the presiding officers of the location ICC and Corporate ICC shall hold office for such period, not exceeding 3 years for the date of their nomination. The presiding officer of respective location shall nominate new member within 3 working

days in case of their cessation of employment from the company. The Head – HR & Admin., shall nominate presiding officer within 3 working days in case of their cessation of employment from the company.

- ❖ The details of presiding officers and members of Corporate ICC is attached for ready reference as Annexure-I.

8. MAINTENANCE OF REGISTER

The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation. The Register will be in the custody of the Human Resource Department of the Company.

9. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

10. PROTECTION TO COMPLAINANT / VICTIM

- 10.1** The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.
- 10.2** The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- 10.3** However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action. The complaint committee member is barred to sit over the proceedings in all the cases, where they are the complainants.

11. INTERIM RELIEF

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend the employer to:

- a) Transfer the aggrieved individual or the respondent to any other workplace;

or

- b) Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- c) Grant such other relief to the aggrieved individual as may found to be appropriate; or
- d) Restraint the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief is implemented, Assistant Manager-HR shall inform the Committee regarding the same.

12.ACTION

12.1 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.

12.2 If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.

12.3 If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:

- a. Take action for sexual harassment as a misconduct.
- b. To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
- c. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- d. Such action will be taken within 30 days of the receipt of report.

13.AWARENESS

- 13.1** All the Permanent Employees, employees on contract basis, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
- 13.2** A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the organization during their initial Induction.
- 13.3** The company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

ANNEXURE – I

Internal Complaints Committee headed by: Mrs. P. Jhansi, Senior Executive.

Final action taken by : Mr. A. Madhusudhana Reddy,
Head HR and Legal

**INTERNAL COMPLAINTS COMMITTEE
FOR THE PERIOD 2022 TO 2025**

Sl. No	Name of the Employee	Role	Contact Details	Email - ID
1	Mrs. P. Jhansi	Chairperson	9121666668	jhansi@dodladairy.com
2	Ms. P. Santhoshi	Member	9100051857	santhoshi.p@dodladairy.com
3	Ms. Amrutha Bawgi	Member	7995407062	amrutha.b@dodldairy.com
4	Mr. S Nageswar Rao	Member	9515110806	nageswarrao.s@dodladairy.com
5	Mr. V Krishna Prasad	Member	98499 82488	krishnaprasad.v@dodladairy.com
6	Mrs. K. Savithri (Advocate)	External Member	7337440937	savithri.kicc@gmail.com

ANNEXURE – II – COMPLAINT SHEET

Date:

Place:

Particulars	Details
Name, designation, and contact details of the Complainant	
Name and designation of the alleged offender/ harasser	
Date of the alleged incident of harassment	
Location of the alleged incident of harassment	
Description of the alleged incident	
Name and designation of witness, if any	
Details of and proof or evidence supporting the alleged incident, if any	

Signature