

SEAWAYS SHIPPING AND LOGISTICS LIMITED  
(CIN: U63010TG1989PLC010716)

Regd office: "Seaways Pride", Plot No: 731, Road No 36, Jubilee Hills, Hyderabad- 500 034,  
Tel: +91 40 66447000, Fax: +91 40 66102040, URL: [www.seawaysindia.com](http://www.seawaysindia.com)

**SEXUAL HARASSMENT POLICY**

**1) Applicability**

This Policy (The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) is applicable to all employees of Seaways Shipping and Logistics Limited and its group companies in India ("Seaways" / "Company"), who are either (a) on the rolls of it or (b) engaged through the Contractor(s) having service agreement(s) with the Company.

**2) Objective**

This policy has been formulated keeping in view the provisions under The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 ("Act").

The said policy is to define the guidelines and the process to be followed in order to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto.

In this Policy, unless there is anything repugnant to the subject or context thereof, the words and expressions as stated below shall have the following meanings:-

- a) **CE – Complainant Employee:** Refers to any woman employee who has lodged a complaint of sexual harassment.
- b) **ICC – Internal Complaint Committee**
- c) **Management / Employer–** Management / Employer means Company's Managing Director and Whole Time Directors or such other officer or Officers/nominee or nominees as may be authorized in this behalf.
- d) **RE – Respondent Employee:** Refers to any employee against whom the complaint for sexual harassment has been lodged.
- e) **Workplace –** Includes all offices and branches of Seaways located in India.

**3) Preamble**

Sexual harassment is not only a serious misconduct but criminal offence also, which can destroy human dignity and freedom. In an effort to promote the well-

being of all women employees at the workplace, this Policy envisages as under: -

- a) It shall be the duty of the Management to prevent or deter the commission of any act of sexual harassment at the workplace.
- b) Sexual Harassment will be considered as misconduct and action will be taken based on the findings of the enquiry in this context.
- c) Sexual Harassment|| includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely Physical contact; or Sexual Harassment, 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 or Any other acts as are specifically defined under the Act.

**4) Internal Complaints Committee (hereinafter referred to as "the ICC")**

The ICC will comprise of the following:

- a) Presiding Officer- The presiding officer shall be a woman employed at a senior position from amongst employees. (Preferably DGM cadre and above).
- b) Member- a woman employee from HR/Admn dept.
- c) Member – a senior employee from HR/Admn dept. (male or female).
- d) Member - From amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. (preferably a woman)

The Management will nominate the presiding officer and members and they shall hold office for a period not exceeding three years, from the date of their nomination and/or as may be specified by the Management from time to time.

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**5) Procedure of filing a Complaint-**

- a) The complaint should be made by an aggrieved woman within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of last incident.
- b) The complaint by an aggrieved woman employee shall be made to ICC in writing and be sent either by post or given in person to the ICC.
- c) The ICC 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 the employee from filing a complaint within the said period.

**6) Procedure to be followed post receipt of Complaint**

- a) The ICC would go through the details of the complaint and evaluate if there is a prima facie case or not.
- b) The ICC will initiate a detailed enquiry as deemed fit.
- c) The ICC may, before initiating an enquiry and at the request of the CE, take steps to settle the matter between her and the RE through conciliation, provided that no monetary settlement shall be made as a basis of conciliation.
- d) Where a settlement has been arrived during conciliation, the ICC shall recorded the settlement and forward to the employer.
- e) However, if the terms arrived during conciliation has not been complied with by the RE, the ICC shall proceed to make an enquiry into the complaint or as the case may forward the complaint to the police as deemed necessary.
- f) The copies of the settlement as recorded during conciliation shall be provided to the both the parties.
- g) The ICC shall, after completing the enquiry, submit its recommendations to the

Management with recommendations of the penalty (if any) to be imposed.

- h) In case no settlement is arrived, the ICC, shall, where the Respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the rules.
- i) Where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
- j) The HR / Administrative Department will extend full cooperation in facilitating to conduct the proceedings by the ICC.
- k) An employee, who is found to have committed an act of harassment or victimization, will be subject to stringent disciplinary action, as may be decided by the Management.

**7) Appeal by the aggrieved person**

Any person aggrieved from the recommendations made by the ICC, enquiring with the allegations against the respondent employee has not proved, or the ICC arrived at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading documents may prefer an appeal to the Management as per the provisions of the Act.

**8) Effective date & Terms of reference**

The policy shall be effective immediately from the date of approval by the Management and continue to be in force until and unless amended in order to suit the provisions of the Act, if any.

The HR department will monitor the terms of reference at the head office and ensure proper mechanism for effective implementation of the policy, across the Company.

In case of difference of opinion on interpretation of any of the above, the relevant provisions of the Act and/or amendments, if any, thereto shall prevail over in all respects and be decided accordingly.