



POLICY ON PREVENTION OF SEXUAL HARASSMENT

LCC PROJECTS LIMITED

(Formerly known as LCC Projects Private Limited)

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1. INTRODUCTION:

LCC Projects Limited (“Company”) is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The Company operates a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

In order to address and take remedial measures against sexual harassment of women at workplace, an Act has been enacted titled “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“the Act”) with the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“the Rules”) thereunder. The provisions of the Act are applicable to every organization, dwelling place or house, which employs women on regular, contract or daily wage basis for carrying out any work.

2. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or in appropriate touching.
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker’s appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy

- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. The Company recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

The Company recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of the Company, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within the Company's premises or outside, including at social events, business trips, training sessions or conferences sponsored by the Company.

3. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE AND RESPONSIBILITIES:

- i. The Internal Complaints Committee shall consist of the following members to be nominated by the Company, namely:
 - a) Presiding officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case a senior level woman is not available the presiding officer shall be nominated from other offices.
 - b) Not less than 2 members from amongst employees preferably committed to the cause of women, who have had experience in social work or have legal knowledge;
 - c) One member from amongst NGOs, or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
 - d) At least one half of the total members shall be women. The members will hold office for such period not exceeding 3 years.
- ii. The internal Committee shall discharge all functions and responsibilities as mandated by the Act

and Rules.

4. COMPLAINTS PROCEDURES:

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. LCC Projects Limited recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, he/she may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within a period of three months from the date of incident and in case of a series of incidents,

within a period of three months from the date of last incident. This period can be extended by the Internal Committee for reasons recorded in writing.

Where the aggrieved employee is unable to make a complaint on account of their physical incapacity, a complaint may be filed by a) a relative or friend; or b) a co-worker; or c) an officer of the National Commission for Women or State Women's Commission; or d) any person who has knowledge of the incident, with the written consent of the aggrieved person.

Where the aggrieved employee is unable to make a complaint on account of their mental incapacity, a complaint may be filed by a) a relative or friend; or b) a special educator or c) a qualified psychiatrist or psychologist; or d) the guardian or authority under whose care they are receiving treatment or care; or e) any person who has knowledge of the incident jointly with any of the above.

Where the aggrieved employee on for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent.

Where the aggrieved employee is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Throughout the complaint's procedure, a victim is entitled to be helped by a counsellor within the Company. LCC Projects Limited will nominate a person from senior management and provide him with special training to enable him to assist victims of sexual harassment. LCC Projects Limited recognizes that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. LCC Projects Limited understands the need to support victims in making complaints.

5. PROCEDURE FOR DEALING WITH COMPLAINTS OF SEXUAL HARASSMENT:

The procedure for dealing with complaints of sexual harassment shall be as per the procedure laid down

under sections 10 to 16 of the Act read with the relevant Rules.

Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the Company. They can do so through labour court or judicial court.

Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain

serious cases, including physical violence, will result in the immediate dismissal of the harasser.

6. IMPLEMENTATION OF THIS POLICY:

LCC Projects Limited will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the Company. Every year, LCC Projects Limited will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

7. MONITORING AND EVALUATION:

LCC Projects Limited recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.

8. EFFECTIVE DATE:

This Policy has been approved by the Board of Directors and is effective from 18.02.2025.

9. POLICY REVIEW:

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy or may make an amendment as and when require.

10. DISCLOSURES:

The Company shall disclose the Policy on its website.