



Lancer Container Lines Ltd.

Policy of the company under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

In order to prevent sexual harassment of women at work place a new act, The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has been notified on 9th December, 2013. The company has adopted a policy for prevention of Sexual Harassment of Women at workplace and has set up committee for implementation of said policy.

Objective:

Lancer Container Lines Limited has zero tolerance for sexual harassment at workplace and has adopted a policy on prevention, prohibition and redressal of sexual harassment at workplace in line with the provisions of the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules thereunder for prevention and redressal of complaints of sexual harassment at workplace. The company is committed to providing equal opportunities without regard to their race, caste, sex, religion, colour, nationality, disability, etc. All women associates (permanent, temporary, contractual and trainees) as well as any women visiting the company's office premises or women service providers are covered under this policy. All employees are treated with dignity with a view to maintain a work environment free of sexual harassment whether physical, verbal or psychological.

Definition of sexual harassment:

Sexual harassment shall mean the same as defined in "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013".

Policy statement:

- a) All company employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All company employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All company employees are required to maintain a work environment, which is free from any kind of harassment.
- d) The company employees will refrain from committing any acts of sexual harassment at work place.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) The Company employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

Procedure for dealing with complaints of sexual harassment:

- a) If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Internal Complaints Committee.
- b) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
- c) An "Internal Complaint Committee" will be set up to deal with the complaint.
- d) The complaint will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- e) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the investigations may recommend disciplinary action against the complainant.



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Disciplinary Action:

Sexual harassment will not be tolerated at Lancer Container Lines Limited. If the outcome of an investigation shows that harassing behavior has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

Confidentiality:

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by Lancer Container Lines Limited shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

Members of Internal Complaint Committee (ICC):

The Internal Complaint Committee shall comprise of as many members as the Board of Directors may nominate from time to time. The present Members of the ICC shall comprise of the following:

- (i) One Presiding Officer who shall be a nominated by the organization or department of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge.

The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.



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