

CEO's Message

Policy for Protection of Women's Rights at the Workplace

We are pleased to announce the release of the Policy for Protection of Women's Rights at the Workplace.

Consistent with its commitment to foster an environment of mutual respect and dignity of all its employees, L&T strongly believes that sexual harassment of its women employees is unacceptable. L&T acknowledges that sexual harassment in the workplace is against the law and will not be tolerated. Therefore, L&T shall strive to protect all women employees from sexual harassment and take appropriate action wherever required.

L&T believes that every woman Employee is entitled to a work environment that is free from any conduct which can be considered as sexual harassment.

This Policy is based on laws of India and therefore the Policy is applicable to all Employees of L&T located in India irrespective of their level, rank or designation, across all departments, functions and operations.



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06th July, 2012

POLICY FOR PROTECTION OF WOMEN’S RIGHTS AT WORKPLACE

A. Introduction

L&T believes that every woman Employee is entitled to a work environment that is free from any conduct which can be considered as sexual harassment. Sexual Harassment infringes the fundamental right of a woman to gender equality under Article 14 and 15 of the Constitution of India and her right to life and live life with dignity under Article 21 of the Constitution of India, which includes the right to a safe environment free from sexual harassment.

The right to protection from sexual harassment and the right to work with dignity are recognized as universal human rights by International Conventions such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified by Government of India. Consequentially, the Supreme Court of India has laid down the fundamental guidelines to address the issue of sexual harassment until a suitable legislation is enacted by Government of India.

B. Objective

The Objectives of the Policy are threefold:

- To define sexual harassment;
- To lay down the guidelines for reporting acts of Sexual Harassment at the workplace; and
- To provide the procedure for the resolution and redressal of complaints of Sexual Harassment.

C. Applicability

This Policy is based on the laws of India and therefore the Policy is applicable to all Employees of L&T located in India, irrespective of their level, rank or designation, across all departments, functions and operations.

Where sexual harassment occurs as a result of an act or omission by any Third Party, L&T will take all steps necessary and reasonable to assist the affected person/victim.

D. Definitions

1. “**Committee(s)**” means committee(s) formed by L&T for redressal of complaints of Sexual Harassment in accordance with the procedure laid down in this Policy.
2. “**Complaint**” means any complaint (written or oral form) made by a female Employee against any other employee within L&T or any Third Party having business dealings with L&T.
3. “**Handbook**” means the Handbook released by the corporate office of L&T, comprising the procedure to handle and redress the Complaints and take necessary preventive and punitive action to handle sexual harassment Complaints for the use of Committees.
4. “**Employees**” mean employees of Larsen & Toubro Limited and employees of its subsidiaries, associate and affiliate companies where L&T’s holding is minimum 50%. Employees would include a person employed at L&T for any work on regular, temporary, ad hoc or daily wage basis, either directly or by 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 domestic worker, a co-worker, a contract worker, probationer, trainee, apprentice or by any other name called. Explanation: The aforesaid definition of ‘Employee’ shall be used only for the purposes of the Policy and cannot be used to claim rights of an employee conferred by any law for the time being in force.
5. “**L&T**” means Larsen & Toubro Limited, an existing company under the Companies Act, 1956, having its registered office at L&T House, Ballard Estate, N.M. Marg, Mumbai 400 001, India which expression shall also include its subsidiaries, associate and affiliate companies where L&T’s holding is minimum 50%.

6. **“Policy”** means this policy for Protection of Women’s Rights at the Workplace including any order in relation to this Policy.

7. **“Sexual Harassment”** means and includes such unwelcome sexually determined behaviour as physical contacts and advances, sexually coloured remarks, showing pornography, a demand of request for sexual favours or any other unwelcome conduct of sexual nature whether verbal, textual, physical, graphic or electronic or by any other actions, which may include, but is not limited to -

- Implied or overt promise of preferential treatment in employment; or
- Implied or overt threat of detrimental treatment in employment; or
- Implied or overt threat about present or future employment status; or
- Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or
- Humiliating conduct constituting health and safety problems.

8. **“Third Party”** means and includes any person not on the rolls of L&T but who, in the course of work-related activities, interacts with the Employees; such as customers, vendors, suppliers of L&T.

E. Structure of Committees

Apex Committee (AC): A permanent committee set up at the Head Office, Mumbai. There are eight Regional Committees (RCC) located at Powai, Delhi & NCR, Chennai, Gujarat, Kolkata, Mysore, Hyderabad and Bangalore.

Local Complaints Committees (LCC): LCCs can be set up with recommendation of the RCC concerned and duly approved by the AC as and when required, at those locations where large number of women are employed. Currently, there are five LCCs established – in Hazira Manufacturing Complex, LTV- Bangalore, Delhi Regional Office, Delhi Area Office and Faridabad Campus.

F. Composition of Committees

As per requirement of law, any complaint committee should comprise:

- Not less than 6 members.
- Not less than 50% members to be women, preferably 75%.
- A woman Head.
- One member from an NGO or other body who is familiar with issues of sexual harassment of women.

Note: In order to ensure effectiveness of the Committees, the Committee constitution should include, wherever possible, senior women Employees and adequate representation from respective businesses under its jurisdiction.

G. Procedure

- Woman Employee makes Complaint verbally or as per Annexure 1: Template for Reporting Sexual Harassment instance to any of the Committee members of LCC or RCC as applicable.
- Keeping in mind the criticality of the responsibility that has been bestowed upon the Committees, it is necessary for them to operate within realistic and reasonable time frames for resolution of Complaints, depending upon the magnitude of seriousness. In any case, the Committees should initiate action expeditiously on Complaints received. Recommendations for resolution should also be made as early as possible preferably within 2 weeks on receipt of Complaint. However, where the investigation process is time consuming, the Complaint should be acted on in an appropriate time frame.
- LCC (wherever applicable) should facilitate redressal of the Complaint in consultation with the concerned Business Head/s and Human Resource Head/s. If unable to do so, the LCC should refer the Complaint to the RCC concerned in writing with recommendations within an appropriate time frame, keeping in mind the severity and sensitivity of the Complaint. In any case, the findings and the details of all resolved Complaints should be forwarded by the LCC to the RCC concerned.

- RCC should facilitate redressal of the Complaint themselves or set up a temporary LCC (if required for the specific Complaint) at the particular establishment. RCC in consultation with the Business Head/s and Human Resource Head/s should redress the Complaint and initiate further action, if required. RCC, if it so desires, can consult the AC for guidance. In exceptional cases where RCC is unable to facilitate any redressal, then all the findings with recommendations should be forwarded to the AC. In any case, the findings and the details of all resolved Complaints should be forwarded by the RCC to AC.
- Employees who are not satisfied with the redressal action of LCC or RCC can approach AC. AC then shall consider the findings and recommendations of LCC or RCC (as the case may be) and facilitate redressal of the Complaint in consultation with Head of Corporate Human Resources of L&T.
- The redressal procedure is detailed in the Handbook for handling Sexual Harassment Complaints.

H. Meetings of Committees

- LCC and RCC will meet quarterly. However, if a Complaint is received the Committee shall meet accordingly for early redressal.
- AC will meet as and when required at least twice a year.

I. Duty of Committee(s)

- Inform complainant of her right to make a Complaint to the Police if she so desires;
- Study and investigate the Complaint in accordance with the principles of natural justice;
- Facilitate the redressal of the Complaint and initiate appropriate action in accordance with the standing orders / applicable regulations in consultation with Business Head and the Human Resource Head;
- In the event the Committee discovers after all the findings that the Complaint is frivolous in nature then such Complaint may be dismissed. The Committee, if it finds the Complaint to be maliciously motivated, should recommend appropriate disciplinary action against the complainant to the Human Resource Department concerned.

J. Documentation

1. The Minutes of the Meetings of all Committees shall be communicated via email to all present;
2. The compilation of the Minutes of the Meetings and detailed report of findings, recommendation and action taken pertaining to Complaint registered with the RCC and LCC shall be communicated every quarter to the AC.
3. Such records and Minutes of the Meeting of the Committees shall be maintained in the office of the Chairperson of each of the Committees and should be retrievable as and when required.
4. Copies of L&T Policy, Handbook and Standing Orders as applicable in L&T should be maintained in the office of the Chairperson of the Committee.

K. Confidentiality

The Minutes of the Meeting of the Committees, the findings, recommendations, decisions of the Committees and any document or any verbal communication shall be kept strictly confidential and the members shall not divulge the details to any other Employee within L&T or to any person outside L&T. Also, to other Employees involved in such discussions, the members should emphasise the necessity for confidentiality and the consequences of possible disciplinary action in case of transgression.

L. Dissemination of this Policy

1. This Policy is issued by the management of L&T;
2. This Policy may be reviewed on a yearly basis for any changes or modifications;
3. This Policy is to be shared with Employees at the time of induction through Human Resource Departments of L&T and appropriate forums such as RCC;
4. Ensure that the Third Parties are made aware of this Policy.

Annexure 1: Template for Reporting Sexual Harassment

To: The Committee for Protection of Women's Rights at Workplace

Sexual Harassment details:

Who is/are the person/s involved in this sexual harassment case? Please provide the name, designation, location, SBU and relationship with you (eg supervisor, colleague, etc)

Critical Incidents and Factual Data:

a. Please describe the incident/s

b. List supporting information/ data that the Committee can seek from you while investigating. e.g. exact date/s, place/s of the incident/s, witnesses, if any, text messages, emails, etc.

Date: _____

Location: _____

Name of the Complainant _____

Contact Information: _____
(Official e-mail id / cell no.)

