

# NATIONAL CEREALS PRODUCTS LIMITED

## POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

### 1. Introduction:

**National Cereals Products Limited** recognizes the right of every employee and volunteer to be able to attend work and to perform their duties without being subjected to any form of sexual harassment.

It is the obligation and responsibility of every employee and volunteer to ensure that the workplace is free from sexual harassment.

**National Cereals Products Limited** is fully committed to its obligation to eliminate sexual harassment in the workplace.

### 2. Purpose & Objective:

The purpose of this document is to outline National Cereals Products Limited's position on sexual harassment and to document the process which is to be followed if any grievances arise.

The objective in implementing and enforcing this policy is to define workplace sexual harassment, prohibit it in all forms, carry out appropriate disciplinary measures in the case of violations, and provide procedures for lodging complaints about conduct that violates this policy and investigating sexual harassment claims.

### 3. Scope:

This policy applies to all employees of the Company and those working for the company at all locations. All workers, including supervisors and managers, will be subject to discipline, up to and including discharge, for any act of sexual harassment they commit.

### 4. Definitions:

"Sexual Harassment" includes such unwelcome sexually determined behaviour, (whether directly or by implication) as:

- physical contact and advances;
- a demand or a request for sexual favours;
- sexually colored remarks
- showing pornography
- And any other unwelcome physical verbal or nonverbal conduct of a sexual nature.

When any of these acts are committed in circumstances where the victim of such conduct has a reasonable apprehension that such conduct can be humiliating and may constitute violation of privacy, health and safety problem.

It would constitute sexual harassment where a woman has reasonable ground to believe that her

objections would disadvantage her in connection with her employment or work including recruitment or promotion or when it creates a hostile work environment and adverse consequences might occur if the victim does not consent to the conduct in question or raises any objection thereto.

## **5. Policy**

The Company will not tolerate sexual harassment under any circumstances. Responsibility lies with every Manager, Supervisor and employee/volunteer to ensure that sexual harassment does not occur.

Both federal and state Equal Employment Opportunity legislation provide that sexual harassment is unlawful and establish minimum standards of behaviour for all employees.

This policy applies to conduct that takes place in any work-related context, including conferences, work functions, social events and business trips.

A breach of this policy will result in disciplinary action, up to and including termination of employment. The Company strongly encourages any employee who feels that they have been sexually harassed to take immediate action. If an employee or volunteer feels comfortable in doing so, it is preferable to raise the issue with the person directly with a view to resolving the issue by discussion. The employee or volunteer should identify the harassing behaviour, explain that the behaviour is unwelcome and offensive and ask that the behaviour stops.

Alternatively, or in addition, they may report the behaviour in accordance with the relevant procedure. Once a report is made the organisation has the right to determine how the report should be dealt with in accordance with its obligations and this policy.

Any reports of sexual harassment will be treated seriously and promptly with sensitivity. Such reports will be treated as completely confidential up to the point where a formal or informal complaint is lodged against a particular person, at which point that person must be notified under the rules of natural justice. Complainants have the right to determine how to have a complaint treated, to have support or representation throughout the process, and the option to discontinue a complaint at any stage of the process.

The alleged harasser also has the right to have support or representation during any investigation, as well as the right to respond fully to any formal allegations made. There will be no presumptions of guilt and no determination made until a full investigation has been completed.

No employee or volunteer will be treated unfairly as a result of rejecting unwanted advances. Disciplinary action may be taken against anyone who victimises or retaliates against a person who has complained of sexual harassment, or against any employee or volunteer who has been alleged to be a harasser. All employees and volunteers have the right to seek the assistance of the relevant tribunal or legislative body to assist them in the resolution of any concerns.

Managers or Supervisors who fail to take appropriate corrective action when aware of harassment of a person will be subject to disciplinary action.

## **6. Complaint Resolution Procedures**

Individuals should report complaints of conduct believed to violate Company's sexual harassment policy according to the policy's complaint procedures. To initiate a formal investigation into an alleged violation of this policy, employees may be asked to provide a written statement about the alleged misconduct to the HR head. Complaints should be submitted as soon as possible after an incident has occurred. The HR head may assist the complainant in completing the statement. To ensure the prompt and thorough investigation of a sexual harassment complaint, the complainant should provide as much

of the following information as is possible:

- The name, department and position of the person or persons allegedly causing the harassment.
- A description of the incident(s), including the date(s), location(s) and the presence of any witnesses.
- The effect of the incident(s) on the complainant's ability to perform his or her job, or on other terms or conditions of his or her employment.
- The names of other individuals who might have been subject to the same or similar harassment.
- What, if any, steps the complainant has taken to try to stop the harassment.
- Any other information the complainant believes to be relevant to the harassment complaint.

## **7. Discipline**

Employees who violate this policy are subject to appropriate discipline. If an investigation results in a finding that this policy has been violated, the mandatory minimum discipline is a written reprimand. The discipline for very serious or repeat violations is termination of employment. Persons who violate this policy may also be subject to civil damages or criminal penalties.

## **8. Confidentiality**

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept as confidential as possible. However, the identity of the complainant is usually revealed to the respondent and witnesses. The HR director takes adequate steps to ensure that the complainant is protected from retaliation during the period of the investigation. All information pertaining to a sexual harassment complaint or investigation is maintained by the HR head in secure files. The HR head can answer any questions relating to the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

## **9. Protection To Complainant / Victim**

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.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

## **10. Conclusion**

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.