



PEACEFUL COEXISTENCE

The Company respects the religious, geographical and cultural diversity of its employees and expects that all employees will work in an environment, which promotes and supports peace & harmony. Provoking and hurting the sentiments of the individual's belief and values should be avoided.

Anti-Discrimination and Non-Harassment

LKP is committed to ensuring a safe workplace free from any form of discrimination or harassment. Harassment of any type (i.e. sexual, intimidating or victimization) is totally unacceptable at LKP, and will not be tolerated. Discrimination and harassment are not only offensive and unacceptable, but also unlawful.

The Anti-Discrimination and Non-Harassment policy applies to all LKP employees during work hours and in any other work related context including conferences, work functions, office parties and business or field trips.

Discrimination

Discrimination occurs when an employee is treated less favorably than others because of that person's individual characteristics or because that person belongs to a particular group of people. Discrimination does not have to be calculated or intentional to be unlawful. The intention of the person discriminating is irrelevant.

Basically, two types of discrimination can occur in the workplace:

- Direct Discrimination: This is the result of making distinctions between individuals or specific groups so as to disadvantage some over others.
- Indirect Discrimination: can occur when a policy or practice appears neutral but in fact results in an individual or group being disadvantaged.

Harassment

Workplace harassment can be based on a person's gender, race, pregnancy, marital status, disability, age or sexual preference. Harassment usually consists of a pattern of unwelcome behaviour; however, it can consist of just one act where this is of a serious nature. The most common form of workplace harassment is sexual harassment. Sexual harassment is behavior of a sexual nature that is unwelcome or uninvited. It is behaviour that a person finds intimidating, humiliating or offensive.

Examples of sexual harassment include:

- Unwelcome physical conduct such as deliberately brushing up against a person,
- Indecent jokes or comments,
- Sex based insults, taunts, teasing or obscene gestures,
- Display of sexually graphic material including posters, cartoons or the like,
- Persistent requests for dates, when it has been made clear that these requests are unwelcome,
- Offensive leering, staring or gesturing,
- Unwelcome questioning into a person's private life.

Interaction that is consensual, welcome or reciprocated is not sexual harassment.

Responsibility

LKP is committed to maintaining a work environment which is free from discrimination and harassment and where all employees are treated with dignity, courtesy and respect. LKP regards discrimination and harassment as serious issues and aims to treat any complaints in a sensitive, fair and confidential manner.

Failure to implement and support the LKP Anti-Discrimination and Non-Harassment policy may result in discrimination or harassment. Both discrimination and harassment in employment is unlawful and can result in legal action and penalties against the company and against individual employees.

Regional Heads

Regional Heads are responsible for ensuring that the policy is implemented and adhered to on a day to day basis. As a matter of course, Branch Heads/ Zonal & Functional Heads must:

- Ensure that proper standards of conduct are maintained at all times, that harassment is actively discouraged, and that employees are aware of LKP's policy,
- Ensure that their own behavior, and that of their staff, does not create or condone circumstances which may lead to discrimination or harassment,
- Ensure that staff have access to information regarding the channels for advice,
- Ensure confidentiality,
- Promptly refer any complaints to human resources.

Employees

It is the responsibility of all employees to contribute to a working environment free of discrimination and harassment and to avoid practices, attitudes and behavior that may be considered discriminatory.

Should an employee encounter behaviour they consider unacceptable and which they believe constitutes discrimination or harassment, they should:

- Make it clear that the behavior is unacceptable, and
- Where the behavior continues, report it to their Reporting Manager/ Zonal Head/ HOD or Human Resources.

If an employee witnesses an incident of harassment, they should assist the employee by ensuring he/she is aware of his/her rights and the proper procedure for making a complaint. In situations where the alleged harassment involves physical contact, the complainant has the right to contact the appropriate authority.

Human Resources

Human Resources will ensure that:

- The Anti-Discrimination and Non-Harassment policy is understood and that Branch Managers / HOD's and staff are educated in responsibilities under the policy,
- Information in relation to training about harassment is available,
- The policy is monitored to ensure compliance,
- Complaints are attended to promptly and with the strictest confidentiality,
- Complaints are investigated impartially and treated seriously and sensitively.

PROCEDURE

Responding to Unwelcome Behavior

If an employee is confronted with what they consider could be discrimination or harassment of any type they should:

- Remember that discrimination and harassment are not only contrary to LKP policy, they are illegal...so don't be afraid to tell someone!
- Not ignore the discrimination or harassment as this may escalate the behavior,
- Make it very clear that the behavior is both offensive and unacceptable,
- Make a complaint to their Reporting Manager/ Zonal Head/ HOD or Human Resources who will take action to rectify the situation,
- Be honest and open with the person investigating the complaint about what happened so that appropriate action can be taken.

An employee who feels they have been subject to discrimination and/or harassment should raise their complaint in the following way:

- In the first instance, speak with the person directly concerned and state that their behaviour is not welcome and that it is to cease. At this point the complaint may be resolved. If this is the case, then no further action is required.
- If the employee is unable to do this for whatever reason, or if they have approached the person directly and the behavior continues, then they should speak to their Reporting Manager / Zonal Head / HOD or Human Resources.

- If the employee feels uncomfortable speaking with their Reporting Manager / Zonal Head / HOD, they should approach their Human Resources Head. All Reporting Manager / Zonal Head / HOD's must refer complaints to Human Resources for resolution as soon as possible.

As a responsible employer, LKP has constituted a Complaints Committee headed by a woman and not less than half of its members are women with underlying commitments that:

- Complaint resolution should be time bound.
- Confidentiality of the complaint procedure is maintained.
- Complainants or witnesses should not be victimized or discriminated against while dealing with complaints.
- Please find the Committee Members for the same. Please feel free to contact them in case you will be having any issues regards the same.

Sr. No	Name	Email Id
1	Rashmi Gavas	rashmi_gavas@lkpsec.com
2	Dinesh Waghela	dinesh_waghela@lkpsec.com
3	Sunita Ambavkar	sunita@lkpsec.com
4	Dhelina Menezes	dhelina@lkpsec.com
5	External Member -	Yet to be decided.

Making a Complaint

- Employees can directly make complaint to ICC team on ICC@lkpsec.com .
- Even they can intimate to Human Resources Department will handle all complaints; however an employee can make an initial complaint to:
 - Their Reporting Manager
 - Their Head Of Department/ Zonal Head
 - **Key People of Resp. Zones :**
 - Zone 1 (Delhi), Zone 3 (Chennai) and Zone 4 (Bangalore) , Zone 7 (Ahmedabad) – **Mr. Ashok Agarwal** - ashok_agarwal@lkpsec.com

(Resp.Key person will further communicate to IC committee members)

If a Reporting Manager / Regional Heads/ Functional Heads or employee receives a complaint, it must be referred to the Human Resources Department.

Complaint Handling

Human Resources will immediately take the following steps in handling the complaint:

- Take prompt action and ensure the strictest confidentiality.
- Interview the complainant and clarify the nature of the complaint, by either taking a statement from the complainant or requesting that the complaint is put in writing.
- Notify the complainant of alternatives available in resolving the complaint. This must include advice that the complainant has the right to lodge the complaint with the appropriate authority.
- Explain to the complainant the conciliation process and possible outcomes.
- Proceed with the complaint only if requested to do so by the complainant.
- Meet with the alleged harasser.
- Fully inform the alleged harasser of the complaint, the name of the complainant and the complaint procedures.
- Give the alleged harasser opportunity to respond to the allegations.
- Inform the complainant of the discussion and outcomes of the meeting between human resources and the alleged harasser. Any proposal for resolution will be discussed.
- Keep written records to a minimum to establish the facts and keep all documents secure in human resources. Information pertaining to the allegation will only be accessible to human resources personnel. If disciplinary action is required for any party, notations to the effect will be located in the individual's personnel file.
- Provide both the complainant and the alleged harasser with the opportunity to have an independent person of their choice present at any interviews with human resources.

The process including actions, interviews and documentation is confidential; however it may be necessary to report a complaint to a member of senior management.

Complaints that are made falsely to cause an individual embarrassment or in retaliation, will be treated seriously and may result in disciplinary action.

OUTCOMES

Complaint Resolved

The complaint may or may not have been substantiated (e.g. by witnesses or admission), however the complainant is satisfied by the outcome, and that the behaviour which was the reason for the complaint, has ceased. Follow up should occur with the complainant in 3 to 4 weeks' time to ensure no recurrence. In this case, the complaint will not be recorded on either party's personnel file.

Complaint Substantiated

If a complaint is substantiated, Human Resources may take one or a combination of the following actions, depending on the severity of the situation:

- Counsel the harasser to ensure they understand how their action(s) could have been offensive, and the complainant's right to work in a harassment free environment,
- Gain agreement from the harasser that the behaviour will not occur again,
- Gain assurance that there will be no reprisals or victimisation against the complainant, and that LKP views this as a very serious matter,
- Consider disciplinary action,
- Inform the harasser's Reporting Manager /Zonal Head / HOD of the outcome and request that they monitor the situation,
- Inform the harasser that the complaint and resolution will be filed in human resources and that they have the right to add their own comments,
- Place a notation in the harasser's personnel file alerting human resources that there is a discrete file under the control of the Human Resources Head. No details of the complaint or its resolution will be included in this notation,
- Follow up with the complainant to ensure that the behaviour has ceased and that there are no reprisals.

Should the claim be substantiated one component of resolution may be disciplinary action. Examples of disciplinary action that may be considered are:

- Warning and counselling on the misconduct,
- Transfer to another position with no job advantage,
- Closer supervision of conduct,
- Suspension of employment,
- Termination of employment.

The preferred approach is to resolve complaints through the conciliation process outlined in this policy. However, in the case of substantiated harassment of a serious nature termination of employment may be the only option.

Additionally, substantiated harassment of a serious nature may be a police matter and the victim retains the right to seek police involvement, as does LKP .

Monitoring and Redress

It is important that as a result of an harassment complaint which has been substantiated, the victim is not disadvantaged in terms of work related opportunities including position, status, promotion, career development, salary increases, bonuses or learning and development.

All cases will be reviewed on an individual basis and appropriate redress will be considered.