



Campbell Shipping Private Limited

601/6th Floor, 444 The Corporate Lounge, Linking Road Khar West,

Mumbai 400052 Office +91-22-61456789 Mobile +91-8291357588

POLICY AGAINST SEXUAL HARASSMENT

Doc Title:	CAMPBELL SHIPPING POLICY AGAINST SEXUAL HARASSMENT
Policy No.	SHWW/01
Version	2.0
Prepared By	Lekhak Thapa (Manager-Human Capital)
Approved By	Capt. Rajesh Dhadwal (CEO/MD-Campbell group)
Issue Date	6 th March 2024
Reason for Issue	To define, document & disseminate Campbell Shipping Zero Tolerance Policy for any sexual workplace harassment.
Date of last review	March 2024
Next review date	March 2026



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POLICY AGAINST SEXUAL HARASSMENT

Campbell Shipping Private Limited. (“Company”) believes in providing a safe, nonhostile and harassment free work environment at all its workplaces. We follow a zero-tolerance approach towards sexual harassment at workplace. Sexual harassment includes any direct or implied unwelcome physical, verbal, or non-verbal conduct of sexual nature.

- 1. Applicability:** This Policy applies to the Company and its subsidiaries and covers all persons associated with or visiting the company at any of its locations (Workplaces). This is a gender-neutral policy and applies to all employees irrespective of their sexual orientation or preferences.
 - (a) On the rolls of the establishment; or
 - (b) Engaged through the Contractor(s) having service agreement with the establishment or as enumerated in clause (f) of section 2 of the SHWW Act.
- 2. Complaints:** Any complaint of sexual harassment will be investigated and if proved, will be treated as serious misconduct and breach of the Company’s Code of Conduct and Service Rules and appropriate action will be initiated against the concerned persons. Any aggrieved person who experiences sexual harassment at the Workplace must contact a member of the respective Internal Complaints Committee (ICC) as soon as possible, who will provide guidance regarding filing of a complaint and all reasonable assistance until its disposal. The complaint must be filed in writing with the respective ICC within 3 months from the date of the last incident. Each inquiry of the complaint will be completed within 90 days.
- 3. Confidentiality:** All information pertaining to any complaint shall be treated with all possible care, sensitivity and discretion and any information capable of identifying any party or witness will not be published, communicated, or made known in any manner to the public, press or media.
- 4. Protection:** The company will provide protection to the complainant, if the situation requires and if the victim/complainant feels threatened in any manner. During the pendency of an inquiry, the complainant may submit a written request to the Committee for interim reliefs which will be considered and decided by the ICC on a case-to-case basis.
- 5. Conciliatory Settlement:** If the complainant so requests, before initiating an inquiry, the committee may settle the matter through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation.
- 6. False or Malicious Complaints:** Any person filing false or malicious complaints or producing any forged or misleading document will be liable to appropriate action, including but not limited to dismissal from service.



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7. **Awareness & Training:** Company will conduct awareness programs and create forums for dialogue to sensitize all employees about sexual harassment.

IC: - Internal Committee.

The definition of sexual harassment will be as defined in section 2 (n) of SHWW Act as represented below :-

“**Sexual Harassment**” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- (i) Physical Contact and Advances or
- (ii) A demand or request for sexual favors or
- (iii) Making sexually colored remarks or
- (iv) Showing pornography or
- (v) Any other unwelcome physical, verbal or non verbal conduct of sexual nature.

8. INTERNAL COMMITTEE (hereinafter referred to as IC)

Contact Details of Internal Committee :

No.	Name	Email Address	Mobile Nos.	Member Type
1	Sandra Sequeira	sps@campbellshipping.com	9769005791	Chairperson / Presiding Officer
2	Preeti Mundhra	pgm@campbellshipping.com	8879074542	Member
3	Akshaya S. Mondkar	am@campbellshipping.com	8657923567	Member
4	Lekhak Thapa	lbt@campbellshipping.com	8291357588	Member
5	Cornelia Knowles	knowlesc@campbellshipping.com	242-397-1795	Member
6	Dayanand N. Mangaonkar	dnm@dcsgr.com	9820013747	External Member

Rajesh J Dhadwal
Managing Director/CEO- Campbell Shipping