



NARMADA GELATINES LIMITED

POLICY ON PREVENTION OF SEXUAL HARRASMENT AT WORKPLACE

(Reviewed and updated on 12/02/2026)

NARMADA GELATINES LIMITED

Policy on Prevention of Sexual Harassment (PoSH) of Women at Workplace

Introduction:

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

The ‘Policy on Prevention of Sexual Harassment of women at workplace’ intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

Purpose and Scope of the Policy:

The purpose of this policy is to define workplace sexual harassment and to outline procedures for filing complaints, investigating sexual harassment claims and issuing appropriate disciplinary measures in the case of violations.

This policy applies to all employees of Narmada Gelatines Limited at all locations. All workers, at every level, will be subject to discipline, up to and including discharge, for any violation of this policy. Employees are prohibited from harassing others both on and off the employer premises and during or outside of work hours.

Narmada Gelatines Limited will not, under any circumstances, condone or tolerate conduct which may constitute sexual harassment on the part of any of its employees. It is our policy that all employees have the right to work in an environment free from any type of illegal discrimination, including sexual harassment.

Any employee found to have engaged in such conduct will be subject to immediate discipline, up to and including discharge.

Definitions:

- 1. Sexual Harassment** may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between the Company’s employee and someone that employee deals within the course of his/her work who is not employed by the Company.

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

a) Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:

- Physical contact and advances;
- Demand or request for sexual favors;
- Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- Giving gifts or leaving objects that are sexually suggestive;
- Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- Persistent watching, following, contacting of a person; and
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

b) The following circumstances, if it occurs or is present in relation to any **sexually determined** act or behaviour amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment;
- Implied or explicit threat of detrimental treatment in employment;
- Implied or explicit threat about the present or future employment status;
- Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect her health or safety.

The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the experience of the aggrieved woman.

2. **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary, visitors.
3. **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.
4. **Employee:** A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly 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 co-worker, a contract worker, probationer, trainee, apprentice or by any other such name.

5. **Workplace:** In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Narmada Gelatines Limited, including transportation provided for undertaking such a journey.
6. **Employer:** A person responsible for management, supervision and control of the workplace.

Roles & Responsibilities:

1. **Responsibilities of Individual:** It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:
 - a. Refusing to participate in any activity which constitutes harassment
 - b. Supporting the person to reject unwelcome behaviour
 - c. Acting as a witness if the person being harassed decides to lodge a complaint

All are encouraged to advise others of behaviour that is unwelcome. Often, some behaviours are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behaviour.

2. **Responsibilities of Managers:** All managers at Narmada Gelatines Limited must ensure that nobody is subject to harassment and everyone shall be treated equally. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

Redressal Mechanism – Formal Intervention:

In compliance with the Act, if the complainant's warrants formal intervention, the complainant needs to lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this Policy. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained.

Internal Committee (Henceforth known as 'Committee')

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Committee" is constituted at each location. The detail of the committee is notified to all covered persons at the location (workplace).

The committee at each location comprises of:

- Presiding Officer: A woman employed at a senior level in the organization or workplace.
- At least 2 members from amongst employees, committed to the cause of women and/ or having legal knowledge.
- One external member, familiar with the issues relating to sexual harassment.
- At least one half of the total members is women.

The committee is responsible for:

- Receiving complaints of sexual harassment at the workplace.
- Initiating and conducting inquiry as per the established procedure.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strict confidentiality throughout the process as per established guidelines.
- Submitting annual reports in the prescribed format.

Current nominated members of the committees are given in **Annexure A**.

Lodging a Complaint

The complainant shall submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace.

The complaint must be lodged within 3 months from the date of incident / last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if it is satisfied that there were such reasons preventing the complainant from lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent:

- Legal heir, relative or friend
- Co-worker
- Any person having the knowledge of the incident

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

Wherever possible Company ensures that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

Receiving a Complaint (guidelines)

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are kept in mind by the receiver of the complaint:

- Complaint will be listened to and the complainant will be informed that the Company takes such concerns seriously. Complainant will be informed that these concerns will be reported to the appropriate committee and follow-up action will be taken immediately.
- The situation will be approached without pre-judgment. Written notes will be taken while listening to the person. Complainant is allowed to bring another person to the meeting if they wish. When taking accurate notes, complainants' own words, where possible, be used. Clear description of the incident in simple and direct terms will be prepared and details will be confirmed with the complainant.
- All notes will be kept strictly confidential. The complainant's consent will be sought to proceed with a formal investigation.
- The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.

Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

Resolution procedure through Conciliation

Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the complainant and the respondent. Process of conciliation can only be initiated if requested by the aggrieved woman.

It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation happens within 2 weeks of receipt of complaint.

The committee provides copies of the settlement to complainant & respondent. Once the action is implemented, no further inquiry is conducted.

Resolution procedure through Formal Inquiry

Conducting Inquiry:

The committee shall initiate inquiry in the following cases:

- No conciliation is requested by aggrieved woman.
- Conciliation has not resulted in any settlement.
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent.

The Committee shall proceed to make an inquiry into the complaint within a period of 1 week of its receipt of the original complaint / closure of conciliation / repeat complaint.

Manner of inquiry into complaint:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses.
- Upon receipt of the complaint, the committee sends 1 copy of the complaint to respondent within 7 working days.
- Respondent replies with all supporting documents within 10 working days of receiving the copy of the complaint.
- No legal practitioner can represent any party at any stage of the inquiry procedure.
- The Complaints Committee makes inquiry into the complaint in accordance with the principles of natural justice.
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer is present.
- Interim relief.
- During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to –
 - a) Transfer the complainant or the respondent to any other workplace
 - b) Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled
 - c) Prevent the respondent from assessing complainant's work performance
 - d) Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the employer will inform the committee regarding the same.

Termination of Inquiry:

Committee at Narmada Gelatines Limited may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without reason. Before termination or passing ex-parte order, 15 day written notice to be given to the party.

Inquiry procedure:

All proceedings of the inquiry shall be documented. The Committee shall interview the respondent separately and impartially. Committee shall state exactly what the allegation is and who has made the allegation. The respondent will be given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings shall be prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent shall also be interviewed & their statements shall be taken.

If the complainant or respondent desires to cross examine any witnesses, the Committee shall facilitate the same and record their statements.

In case complainant or respondent seeks to ask questions to the other party, they may submit such questions to the Committee which will ask such question from other party and record their statements.

Any such inquiry including the submission of the Inquiry Report shall be completed within 90 days from the date on which the inquiry was commenced. The inquiry procedure ensures absolute fairness to all parties.

Considerations while preparing Inquiry Report:

While preparing the findings/recommendations for making Inquiry Report, following are considered:

- Whether the language used (written or spoken), visual material or physical behaviour was of sexual or derogatory nature,
- Whether the allegations or events follow logically and reasonably from the evidence,
- Credibility of complainant, respondent, witnesses and evidence,
- Other similar facts, evidence, for e.g., if there have been any previous accounts of harassment pertaining to the respondent,
- Both parties have been given an opportunity of being heard,
- A copy of the proceedings was made available to both parties enabling them to make representation against the findings.

A copy of the final findings shall be shared with the complainant and the respondent to grant them an opportunity to make a representation on the findings to the committee.

Action to be taken after inquiry:

Post completion of inquiry, the Committee shall submit its report containing the findings and recommendations to the employer within 10 days of completion of the inquiry.

The findings and recommendations shall be reached from the facts that are established and recorded accurately in report.

If the situation so requires or upon request of the complainant, respondent or witness, Management at Narmada Gelatines Limited may decide to take interim measures such as transfer, changing of shift, grant of leave etc., to grant protection against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

Complaint Unsubstantiated:

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it may recommend to the employer that no action is required to be taken in this matter.

Further, the committee shall ensure that both parties understand that the matter has been fully investigated, that the matter is now concluded and no one will be disadvantaged within the company.

Complaint Substantiated:

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counselling
- ii. Censure or reprimand
- iii. Apology to be tendered by respondent
- iv. Written warning
- v. Withholding promotion and/or increments
- vi. Suspension
- vii. Termination
- viii. or any other action that Management may deem fit.

The employer at Narmada Gelatines Limited will act upon the recommendations within 60 days and confirm to the committee.

Once the actions have been implemented, the committee will follow up with the complainant to ensure that the behaviour has stopped and that the solution is effective. This follow-up will be carried out by the complainant's Line Manager with support from HR, ensuring that no party is subject to unfair treatment or harm.

Malicious Allegations:

If the committee comes to know that the allegation against the respondent is malicious or that the complainant knowingly submitted a false complaint or provided forged or misleading documents, it may advise the employer to take appropriate action against the complainant.

The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints.

While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

Confidentiality:

The identities of the complainant, respondent, and witnesses, along with any statements, evidence collected during the inquiry, the committee's recommendations, and the employer's actions, shall be treated as confidential. This information must remain private and not be disclosed to the public or media.

Violation of these confidentiality requirements will result in disciplinary action as outlined in the Act.

Appeal:

Any party dissatisfied with or adversely affected by the implementation or non-implementation of the recommendations may appeal to the appellate authority (courts), as per the Act and regulations, within 90 days of receiving the recommendations.

Policy Implementation and Review

The policy will be implemented and reviewed by the Internal Compliant Committee. The Company reserves the right to amend, abrogate, modify, rescind / reinstate the entire policy or any part of it at any time.

While implementing the Policy following do's and Don'ts shall be observed

Do's:

1. Be well versed the company's Policy on Prevention of Sexual Harassment.
2. Maintain confidentiality regarding any aspect of an inquiry to which they may be party to.
3. Refrain from taking discriminatory actions or decisions which are contrary to the spirit of this policy.
4. Say "NO" to offensive behaviour as soon as it occurs.

Don'ts

Verbal harassment:

1. Sexually suggestive comments or comments on physical attributes.
2. Offensive language that insults or demeans a colleague, using terms of endearment.
3. Singing or humming vulgar songs.
4. Requests for sexual favours, sexual advances, coerced acts of a sexual nature.
5. Requests for dates or repeated pressure for social contact.
6. Discussing sexual activities, sexual prowess or intruding on the privacy of an associates.
7. Sexually coloured propositions, insults or threats.
8. Graffiti in the office premises.

Nonverbal harassment:

1. Offensive gestures, staring, leering or whistling with the intention to discomfort another.
2. Even if not directly done to a particular individual, uttering a word, making a gesture, or exhibiting any object with the intention that such word, gesture, or object be heard or seen by associates.
3. Sounds, gestures, display of offensive books, pictures, cartoons, magazines, calendars, or derogatory written materials at one's workplace.
4. Showing or mailing pornographic posters, Internet sites, cartoons, drawings.
5. Suggestive letters, phone calls, SMS, electronic instant messaging, or e-mail messages.

Physical harassment:

1. Physical contact or advances.
2. Intentional touching of the body, e.g. Hugs, kisses, brushing, fondling, pinching etc that make others uncomfortable.
3. Any displays of affection that make others uncomfortable or are inappropriate at the workplace.

Annexure A

**Internal Committee at NARMADA GELATINES LIMITED
(2026)**

Sr. No.	Name of the Members	Designation	Email Id
1.	Dr. Sushma Rajput	Presiding officer	sushma.titan@gmail.com
2.	Mr. Ashok K Kapur	Member	Ashok.kapur@narmadagelatines.com
3.	Mr. Devesh Ghosh	Member	Devesh.ghosh@narmadagelatines.com
4.	Mrs. Perna Oswal	External member	csprernagandhi@gmail.com