

NARMADA GELATINES LIMITED

SEXUAL HARASSMENT POLICY

(FOR PREVENTION, PROHIBITION & REDRESSAL)

Objective

The Company aims to be a gender neutral workplace providing equal employment opportunity to its employees. The objective of this policy is to place adequate measures on employee safety and security at workplace thereby providing a safe and healthy environment for employees.

Applicability

The policy is applicable to all employees of the Company.

Definitions

"**Sexual Harassment**" unless there is anything repugnant in the subject or context, means

- Any unwelcome, sexually determined behavior, direct or by implication, and includes any physical contact and advances;
- Demand or request for sexual favors, sexually coloured remarks, unsavoury remarks;
- Showing pornography, any other unwelcome physical (for example, touching or brushing against any part of the body and the like, etc.) and
- Verbal or non-verbal conduct having sexual overtones.

For the purposes of this policy "Sexual Harassment" shall include, but will not be confined to the following:

- Unwelcome sexual advances, requests for sexual favours, and/ or verbal or physical conduct of a sexual nature made, either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any company activity;
- Unwelcome sexual advances and/ or verbal, non-verbal or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or through e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds or display of a derogatory nature that have the purpose or effect of interfering with an individual's performance or of creating an intimidating, hostile or offensive environment;
- Forcible physical touch or molestation;
- Eve teasing, innuendos and taunts and any other act likely to impinge upon one's privacy;
- Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace hostile or intimidating to a person belonging to the other/ same sex;
- Any such conduct committed by a third party or outsider in relation to an employee of the Company, or vice versa during the course of employment.

"Employee" means any person on the rolls of the Company to whom this policy is applicable including temporary, part time, honorary employees by whatever name

called and would include employees engaged on a casual or project basis and also engaged through a contractor.

“**Competent Authority**” means the HR Manager of the Company.

Scope

This Policy will be applicable to all allegations of Sexual Harassment:

- by an Employee against another Employee irrespective of whether Sexual Harassment is alleged to have taken place, within or outside the Company premises; or
- by an Employee against a third party or vice versa, within the Company premises.

Complaints Committee (herein referred as ‘CC’)

The Complaints Committee of the Company would be comprised of the following members:

Woman Director/ Director	:	Committee Member & Presiding Officer
Director	:	Committee Member
Head of one of the Departments	:	Committee Member
Head – HR/IR	:	Committee Member & Co-ordinator

The Committee should have at least one female member. The Committee may at its discretion, appoint an external person to assist in the enquiry proceedings.

Sexual Harassment complaints can be registered with any of the Committee members.

Grievance Procedure

- Any Employee (“**Complainant**”) may lodge a complaint of Sexual Harassment (“**Complaint**”) against an Employee / third party (“**Accused**”), with any of the members of the ‘CC’ within 30 days from the date of occurrence of the alleged incident. If the Complainant feels that she/ he cannot disclose her/ his identity for any particular reason with the ‘CC’ members, she/ he can address the complaint to the Competent Authority.
- Such a Complaint may be oral or in writing.
- If the Complaint is oral, the same shall be put in writing by the hearing authority and shall be signed on every page, by the Complainant.
- The CC will hold a meeting with the Complainant latest within a period of 30 (thirty) days within the receipt of the Complaint and advance intimation of the scheduled meeting will be given to the Complainant.
- At the first meeting of the CC, the Complainant shall be heard and her/ his statement recorded (“**Statement of Allegation**”). The Complainant can produce any proofs (written, audio or video, etc) to substantiate her/ his Complaint. The same should be registered by the CC in the Statement of Allegation.
- If prima facie, the CC is certain about the validity of the Complaint, the CC should provide to the Complainant the opportunity of a transfer or leave or work from home. If the Accused is working in the same department/ location, the transfer of the Accused should take precedence over the Complainant.
- Thereafter, the Accused will be called for the meeting with the CC where he/ she will be briefed about the allegation. The Accused will be given an opportunity to give an explanation in the interest of principles of natural justice.

- If the Accused accepts the allegation, the CC will close the enquiry with its recommendations to the Competent Authority.
- If the Accused refutes the allegation, then an “**Enquiry**” shall be conducted by the CC. This Enquiry should normally be completed within 90 days from the date of meeting with the Accused. The CC can appoint a ‘POC’ (point of contact) within the Committee to carry out the enquiry. The employees of the Company are expected to provide their unequivocal support to the Enquiry.
- The report on the Enquiry should be submitted to the Competent Authority within 10 days of closure of Enquiry.
- The Competent Authority shall act on the Enquiry findings within 60 days of the receipt of Enquiry report as per the provisions of the Company’s Code of Conduct.
- In the event of a major misconduct, the Company shall also inform appropriate government authorities after taking written approval from the Complainant. If the Complainant refuses to approve of the proposal to inform the government authorities, the same should be recorded in writing and filed along with the Enquiry report.
- In case the Complaint registered by the Complainant is found to be false or done with malicious intent, the Complainant shall be liable for appropriate action including termination of employment.

Procedure for Enquiry

- On receipt of the Complaint, the committee member should inform the Coordinator within 3 working days.
- The Coordinator of the CC should study the Complaint and brief the Chairperson. On approval of the Chairperson, Coordinator shall call for the first meeting of CC to take the oral statement of the Complainant. The Coordinator shall, within 3 days of the meeting, prepare the Statement of Allegation and circulate the same to all CC members to take their comments/ feedback.
- The CC shall hand over the Statement of Allegation to the Accused and give an opportunity to the Accused to submit a written explanation if he/ she so desires within 15 days of receipt of the same.
- Subsequent meeting of CC with the accused to hear the explanation should be done within 2 weeks of preparation of the Statement of Allegation.
- The CC shall immediately proceed with the Enquiry and communicate the same to the Complainant and the Accused. The CC shall record all the proceedings of the Enquiry and all parties present at any of the communication meetings, shall endorse the same in token of authenticity thereof.
- The Complainant will be provided with a copy of the written explanation submitted by the Accused.
- If the Complainant or the Accused desire any witnesses to be called, they shall communicate in writing to the CC, the names of witnesses whom they propose to be called.
- If the Complainant desires to tender any evidence before the CC, she/ he shall supply true copies of such evidence. Similarly, if the Accused desires to tender any evidence before the Complaints Committee, he/ she shall supply true copies of such evidence. All such evidences should be self-attested in the presence of the Committee.
- The Committee will call upon all witnesses mentioned by both the parties.

- The CC will provide every reasonable opportunity to the Complainant and to the Accused, for putting forward and defending their respective case.
- The CC shall communicate its findings and its recommendations for disciplinary action to the Competent Authority.

Protection against Victimization

The victim of Sexual Harassment has the option to seek transfer of the perpetrator or his/ her own transfer. In cases where there is no transfer option, the Complainant can opt for a paid leave upto 90 days or closure of the case, whichever is earlier. Such leaves should not be deducted from their PL (paid leave entitlement).

Obligation of the Management

The Management of the Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

Annual Report

The CC shall prepare an annual report at the end of the financial year of the Company, giving a full account of its activities during the previous year. The Competent Authority shall keep such report for the last 3 years at its perusal for submission to the Ministry of HRD, if it is asked to do so.

Deviations

Any deviations from this Policy shall require the concurrence from the Board of Directors.

The Management of the Company reserves the right to modify this policy without prior notice, but subject to the approval by the Board, which will be communicated to all employees by HR Department of the Company.