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Policy #: C/PP/01	Revision # 03	Effective date: 1 September 2024	Supersedes Standard #: C/PP/01/00	To be revised no later than 1 September 2027

Policy on Prevention of Sexual Harassment at Workplace

Context:

- We are an equal opportunity employer and would like to reiterate our commitment to the fundamental right of women equality and provide them workplace where they can work with freedom and dignity.
- This policy has been deduced from **“The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013”**.
- We have zero tolerance towards Sexual Harassment and this policy is a proactive step towards preventing sexual harassment at workplace.

Objective:

- To create a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

Scope:

- All employees including contractors, trainees, probationers, agents and consultants of the organization will be covered under this policy.

Definitions:

1. **Aggrieved woman:** In relation to a workplace, is 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 female employees, temporary/probationary employees or visitors.
2. **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.
3. **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.
4. **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 Sudarshan Chemical Industries Limited, including transportation provided for undertaking such a journey.
5. **Employer:** A person responsible for management, supervision and control of the workplace.

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September 2027**Defining Sexual Harassment:**

Sexual Harassment defined in context of Sudarshan is inclusive of (but not exhaustive to) the following:

1. Making sexual advances or requests for sexual favors.
2. Verbal or physical conduct of a sexual nature.
3. Creating an intimidating, hostile or offensive working environment or atmosphere either by –
 - 3.1: **a. Verbal conduct:** such as epithets, derogatory comments, slurs, unwanted sexual advances or propositions, offers of employment benefits in exchange for sexual favors, graphic commentary, about a person's physical attributes, use of profane, threatening or intimidating language; including calling employees by terms of endearment; using vulgar, kidding or demeaning language, lewd or sexually suggestive language, Threats, Sexually oriented jokes, emails, text messages, voicemails, unwelcome advance
 - b. Nonverbal conduct:** Suggestive or insulting sounds, Obscene gestures, sexually suggestive bodily gestures, or leering.
 - 3.2: **Physical conducts** which interferes with an employee's work or normal movement, Unwanted touching, assault, hitting, kicking or pushing, unwanted physical contact of a sexual nature including sexually suggestive or offensive touching or brushing against another person.
 - 3.3: **Visual conduct** such as leering or the display of derogatory or sexually suggestive/explicit posters, photography, cartoons, drawings, gestures, or objects, sexually suggestive or obscene notes, letters, email or internet information.
 - 3.4: **Threats and insinuations** that a person's employment, wages, promotional opportunities, job or shift assignments, or other conditions of employment may be adversely affected by not submitting to sexual advances or demands for sexual favors
 - 3.5: **Retaliation** for having reported or threatened to report any incident of unlawful harassment
4. Using any communication methods viz. e-mail, SMS for transmitting messages or pictures that are not conducive to work environment or are deemed offensive by the recipients.

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Internal Committee:

In pursuance of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and the Rules framed there under, Sudarshan hereby adopts the following procedure for determining complaints filed to the Internal Complaints Committee (ICC) constituted under the Act. The procedure complies with the basic principles of natural justice and fair play and must be adhered to in all complaints, though, in individual complaints, for reasons to be stated in writing. The composition of the **Committee and important point related to Committee member** is as under:

- I. **Presiding Officer:** A woman employed at a senior level in the organization.
- II. At least 2 members from amongst employees, committed to the cause of women and/or having legal knowledge.
- III. One external member, familiar with the issues relating to sexual harassment.
- IV. At least one half of the total members is women.
- V. A Committee member shall hold office for a period of 3 years from the date of nomination.
- VI. A member of the IC may resign at any time by tendering his resignation in writing to the Company

The **committee** is responsible for the following:

- Receiving complaints of sexual harassment at the workplace
- Rendering all assistance to the complainant in making a written complaint in case she is unable to file a written complaint on her own.
- 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.

Reporting Incidences:

- Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint in detail along with any documentary evidence available or names of witnesses of the alleged incident to any member of the Internal Committee **in writing/e-mail with his/her signature** within **3 months** of occurrence of incident and in case of a series of incidents, the complainant should file a complaint within **3 months** from occurrence of the last incident. Complainant also can lodge a complaint through posh@sudarshan.com, this e-mail will be directed to the committee members.
- The internal committee may extend the time limit **not exceeding 3 months** if it is satisfied that the circumstances were such which prevented the complainant from filing a complaint within the said period.

- If the complainant is unable to lodge the complaint in account of her mental incapacity or death or otherwise, the following may do so on her behalf, **with her written consent**.
 - Legal heir, relative or friend
 - Co-worker
 - Any person having knowledge of the incident.
- In case of a complaint filed by another person on behalf of the complainant (where the complainant is in confinement) the complaint will be investigated in order to explore whether a prima facie case of sexual or workplace harassment exists and whether intervention or some other assistance is required.
- Any supervisor who has knowledge of sexual harassment, or retaliation against a person who has reported / testified any case of sexual harassment, is required to report to the Presiding Officer with a copy Head - HR. Failure to report may result in appropriate action, which may include disciplinary actions.

Redressal Mechanism:

Following procedures will be adhered to for resolution of grievances related to workplace harassment:

1. Redressal through conciliation:

- Once the complaint is received, the committee may take steps, to conciliate the complaint between the complainant and the respondent before initiating the inquiry if so, requested by the complainant.
- No monetary settlement shall be made as a basis of conciliation.
- In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action.
- The internal committee will provide copies of the settlement to the complainant & respondent. Once the action is implemented, no further inquiry will be conducted.

2. Redress through formal inquiry:

In case no settlement is made through conciliation, the committee shall proceed with the procedure of formal inquiry at the request of the complainant.

➤ Procedure for inquiry:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses.
- The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

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- iii. The person against whom complaint is made should be called for a deposition before the Committee after she / he has been shared the complaint copy and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded
 - iv. The Committee shall prepare and hand over the Statement of Allegation to the person against whom the complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires **within 7 days** of receipt of the same.
 - v. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made.
 - vi. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call
 - vii. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom a complaint made desires to tender any documents in evidence before the Committee, he/she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these as original copies.
 - viii. The Committee shall call upon all witnesses mentioned by both the parties.
 - ix. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom the complaint is made, for putting forward and defending their respective case.
 - x. The inquiry shall be completed within a maximum period of 90 days from the date of receipt of the complaint. The Committee will communicate its findings and its recommendations for action to the Managing Director. The report of the committee shall be treated as an enquiry report based on which action on an erring employee can be taken.
 - xi. The Managing Director will direct appropriate action in accordance with the recommendation proposed by the Committee.
- The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for the enquiry process. Under no circumstances, confidentiality of the information can be shared outside. Breach of confidentiality shall be treated as a misconduct subject to disciplinary action.
 - In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offence of Sexual Harassment; the same would be dropped after recording the reasons thereof.
 - If the Internal Committee comes to the conclusion that it was a false and / or malicious allegation against the respondent, and/or the witness has given false evidence or produced any forged or misleading document, it may recommend to the organization to take action against the complainant in accordance to the provisions of the service rules or where no such service rules exist, in such manner as may be prescribed.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.

After completion of enquiry, the enquiry committee shall prepare the findings & share the same with the concerned parties. The final report is prepared which includes conclusion as to whether disciplinary or corrective action is warranted. The final decision will be communicated to the concerned parties. Total time period for writing the report will not exceed 10 days. Incase if the sexual harassment is proved then the person against whom the complaint is made will be eligible for suitable action including termination from the services of the organization.

- During the pendency of the enquiry, enquiry committee on receiving written request from the aggrieved women, in consultation with the Head- Human Resources shall promptly take such action as is reasonably calculated to prevent further harassment from occurring. The confidential documents pertaining to the findings to the enquiry shall be preserved by the Human Resource Department confidentially.

Directive Principles:

- The Committee may recommend action to the Head–HR / Managing Director, which may include transfer or any of the other appropriate disciplinary action as appropriate.
- The management shall provide all necessary assistance and resources for ensuring full, effective and speedy implementation of this policy.
- Where sexual harassment occurs because of an act or omission by any third party or outsider, Third Party Contractor shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and the Management, for making a Police Complaint, shall initiate appropriate action.
- In cases where the situation so warrants and at the sole discretion of the Head-HR / Managing Director, the Enquiry Process may be dropped and complaint case referred straight away to the Police by making a Police Complaint.
- **Prohibition of Retaliation:** Retaliation of any kind against anyone who is involved in the enquiry of or in making an allegation of sexual harassment is prohibited and may result in disciplinary action against the retaliator, up to criminal action by filing FIR, including termination of employment.
- **Reporting of the committee:** The committee of investigators should report to the Managing Director. If required may seek assistance from any other department other than the department from where the complaint has been received.
- **Grievance against any member of Internal Committee:** It is hereby stated that any disciplinary or corrective action initiated against the subject because of the finding of an enquiry pursuant to this policy will be final. The management shall provide all necessary assistance for ensuring full, effective and speedy implementation of this policy.

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Cautionary Statement:

Sudarshan Chemical Industries Ltd. reserves the right to amend or modify this policy in whole or in a part, at any time without assigning any reason whatsoever. However, no such amendments or modification will be binding on the employees unless the same is notified to the employees through intranet. Anyone who does not have access to an intranet can contact the HR champion for a copy of the policy.

Internal Complaints Committee FY 2024-26:

Internal Complaints Committee for the FY 2024– 26 is as follows:

Name	Particulars	Designation	Contact Number	Email ID
Adv. Ujjwala Kadrekar	External Member	Advocate	9869244462	ujwalahemant@gmail.com
Madhuri Sanas	Presiding officer	DGM - CSR, Admin and ESG	9623056871	mdsanas@sudarshan.com
Sanjana Surve	Internal Committee Members	Manager - Troubleshooting	8149668581	Sanjanasurve@gmail.com
Apoorva Natu		Senior Manager - HR	9075084620	aanatu@sudarshan.com
Suvarna Kasture		Senior Manager - R&D	8552000724	smkasture@sudarshan.com
Shantaram Sonawane		Senior Manager - HR	9881308429	sssonawane@sudarshan.com
Shital Gaikar		Deputy Manager - India SC Sales (West)	9167208015	skgaikar@sudarshan.com
Santosh Modhave		DGM - IR	9226343108	smmodhave@sudarshan.com
Mandar Velankar		General Counsel & Company Secretary	7020709159	mmvelankar@sudarshan.com

As a process, the details of the committee will be published on a financial year-on-year basis. In case of any changes due to role change of the above role holders, resignations, etc. of these members the same would be intimated to the employees through common mail communication.

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Internal Trainers for taking awareness sessions:

Location	Name of member
Pune (GHO)	Apoorva Natu
Sutarwadi	Mrunal Patil
Roha	Shantaram Sonawane
Roha	Madhuri Sanas
Roha	Pooja Chaudhari
Mahad	Manisha Barge
Branches	Apoorva Natu

Approving Authority:

Head – People Practices & Managing Director will be the approving authority for any changes to implement to the policy.

NOTE:

For Further Insight on “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” please visit:

<http://www.iitbbs.ac.in/notice/sexual-harrassment-of-women-act-and-rules-2013.pdf>

Revision History:

Sr. No	Title of Policy	Earlier Issue No.	Earlier Effective date	Current Issue No.	Current Effective Date	Reason for change	Approving authority (Name)
01	POSH Policy	00	01.04.2013	01	11.01.2019	Internal Complaints Committee & Trainers	Chairman & MD
02	POSH Policy	01	11.01.2019	02	21.12.2022	Internal Complaints Committee & Trainers	Chairman & MD
03	POSH Policy	02	21.12.2022	03	01.09.2024	Internal Complaints Committee & Trainers	Chairman & MD

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September 2027**Prepared By****Pratik Deshmukh**
Manager, C&B**Reviewed By****Shivalika Raje**
Head, People Practices**Approved By****Rajesh Rathi**
Chairman & MD