



AMINES & PLASTICIZERS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. OBJECTIVE :

The Company is committed to create and maintain secure and safe environment for all its Employees including permanent workmen, temporaries and trainees which is free from harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business. The objective of this policy is to provide protection against sexual harassment of Employees at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith

II. SCOPE

This policy applies to all categories of employees of the Company and labourers on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises including such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.



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III. DEFINITION OF SEXUAL HARASSMENT

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,
3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

IV. INTERNAL COMPLAINTS COMMITTEE (ICC):

Every complaint received shall be forwarded to Internal Complaint Committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose.

Internal Complaints Committee has been constituted of the following members as nominated by the Company:

- A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- One member shall be from amongst Non-governmental organizations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

Atleast half the total members of the Committee have to be women. The Presiding Officer and every member shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.



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V. PROCEDURE

Step 1

An aggrieved employee can meet any committee member on the Sexual Harassment Committee for the purpose of handling grievances present to her/him the grievances in writing and also obtain and acknowledgement from the committee member concerned.

- The Sexual Harassment Committee shall call the employee for discussion. The Sexual Harassment Committee will deal with grievance, in consultation with the resources internal or external it may need and feel appropriate; to reach a conclusive decision.
- Thereafter The Sexual Harassment Committee shall record their findings on the Grievance and communicate their decision to the employee within 7 working days of receipt of the grievance.
- In case The Sexual Harassment Committee is not able to give their decision with the stipulated time period of 7 days for any reasons whatsoever, they shall before the expiry of the stipulated period inform the employee concerned accordingly indicating the extended time limit, which shall not exceed 7 working days, by which a reply would be given to her/him.
- The Sexual Harassment Committee should then give their findings before the expiry of the extended time period.

Step 2

- If the aggrieved employee is not satisfied with the decision of The Sexual Harassment Committee concerned in Step 1 or if she fails to receive any answer with the stipulated or extended period, as the case may be, she shall present her grievance the Managing Director of the Company.
- The Managing Director shall also call the employee, if he deems necessary, for a personal discussion and after examining the relevant facts of the case discuss the matter with the employee concerned, and take appropriate action by communicating their decision to the employee within 3 working days of meeting the employee.
- The decision of the Managing Director will be treated as final.

After the decision is conveyed to the employee, the documented case along with a copy of the reply given to the employee will be sent to the Human Resources department and the original will be retained by The Sexual Harassment Committee



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VI. ACTION:

1. The Committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to the concerned parties.
2. If the allegation against the respondent has not been proved, the Committee may recommend that no action needs to be taken in the matter.
3. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
 - a. Take action for sexual harassment as a misconduct.
 - b. To tender written apology to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
 - c. To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.

VII. FALSE ACCUSATIONS:

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
2. If the Internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaint Committee concludes, that he/she has given false evidence or produced forged or misleading documents.
3. It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. The Company recognizes and expects that some claims may be difficult to prove



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or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

VIII. MISCELLANEOUS:

1. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee
2. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
3. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report: a. Number of complaints of sexual harassment received during the year; b. Number of complaints disposed off during the year; c. Number of cases pending for more than 90 days; d. Number of workshops or awareness program against sexual harassment carried out; e. Nature of action taken by the employer.

IX. CONCLUSION :

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media. The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.



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Annexure I

Composition of Internal Complaints Committee.

| Sr. No. | Name | Membership |
|---------|------------------------|-------------------|
| 1. | Ms. Dimple DSouza | Presiding Officer |
| 2. | Ms. Nishita Bhogaonkar | Member |
| 3. | Mr. Ajay Puranik | Member |
| 4. | Ms. Suman Makhija | Member |