

Prasol Chemicals Limited
(Formerly Known as Prasol Chemicals Private Limited)

Version 3

Policy Adopted at the Board Meeting:

24th March 2023

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT
WORKPLACE

Prasol Chemicals Limited

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Policy of the Company under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

Objective

Prasol Chemicals Limited ('the Company' or 'PCL') is committed to provide a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.

Definition of sexual harassment

- a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- c) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.
- e) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, as defined in (a) above, may amount to sexual harassment:—
 - (i) Implied or explicit promise of preferential treatment at work; or
 - (ii) Implied or explicit threat of detrimental treatment at work; or
 - (iii) Implied or explicit threat about present or future employment status; or
 - (iv) Interference with work or creation of an intimidating or offensive work environment; or
 - (v) Humiliating treatment likely to affect health, safety or self-esteem

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Policy statement

- a) All PCL employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All PCL employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All PCL employees are required to maintain a work environment, which is free from any kind of harassment.
- d) PCL employees will refrain from committing any acts of sexual harassment at work place.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) PCL employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

Procedure for dealing with complaints of sexual harassment

- a) If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Internal Complaints Committee (ICC) or write on icc@prasolchem.com. Any verbal complaint must be reduced to writing before being accepted by the ICC.
- b) Ideally, the complaint should be lodged immediately or within a reasonable period of 3 months from the date of incident/ in case of a series of incidents, within a period of three months from the date of last incident.
- c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
- d) An "Internal Complaints Committee" is set up to deal with the complaint. A female PCL employee will head the committee and not less than half of its members will be women, further to prevent any undue influence, the committee will also consist of a third party, either an NGO or any other body familiar with the issue of sexual harassment.
- e) Any victimization of, or retaliation against, the complainant or any PCL employee who gives evidence regarding sexual harassment or bullying will be subjected to disciplinary action up to and including termination of employment.
- f) In case, the complaint(s) lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.
- g) The complaints committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- h) In Case there is a complaint against any of the ICC members; without involving the said ICC Member, shall take steps to reconstitute the ICC for further process of the complaint.



Disciplinary Action

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

Sexual harassment will not be tolerated at PCL. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behavior has taken place, the harasser will be subjected to disciplinary action up to and including termination of employment.

Internal Complaint Committee (ICC)

The Internal Complaint Committee shall comprise of as many members as the Board of Directors may nominate from time to time, provided that at least one-half of the total number of Members shall be women. The committee will be chaired by a senior female employee, and an external executive from any NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment, will also be part of the committee. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

The Internal Complaints Committee will operate on the following guidelines:-

- a) the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman, Internal Complaints Committee shall meet as and when any instance of violation of the policy is referred to the committee.
- b) Internal Complaints Committee shall prepare the annual report and submit the report pertaining to number of cases filed and their disposal under the act to the Board.
- c) The Presiding Officer and the members of the Internal Complaints Committee will hold the position upto three years from the date of their nomination.
- d) Internal Complaints Committee shall meet as required under the provisions of POSH Act and / or rules made thereunder.

Functioning of the Committee:

A. Lodging a Complaint:

- i) The aggrieved woman can make a complaint to the ICC and / or directly to the Presiding Officer of the Internal Complaints Committee, the inquiry into complaint shall be completed within a period of ninety days.

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ii) where an Aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:

- her relative or friend, or
- her co-worker,
- an officer of the National or State commission for women, or
- any person who has knowledge of the incident, with the written consent of the Aggrieved Women.

iii) where an Aggrieved women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by :

- her relative or friend, or
- a special educator, or
- a qualified psychiatrist or psychologist,
- the guardian, or
- any person who has knowledge of the incident jointly with any of the persons mentioned in above in this paragraph.

iv) where an Aggrieved Women, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved Women.

v) if the Aggrieved Woman would like to initiate action under the Indian Penal Code, 1860 ("IPC"), she may inform the PCL management of the same, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the IPC.

B. Conciliation:

The Internal Complaints Committee may, before initiating an inquiry, at the request of the complainant take steps to settle the matter between her and the Respondent through conciliation. However, no monetary settlement shall be made the basis of the conciliation. Where a settlement has been arrived at as mentioned above, the Internal Complaints Committee shall record the settlement so arrived at and forward the same to the management of PCL to take action as specified in the recommendation and shall provide copies of the settlement to the complainant and the Respondent.

C. Inquiry into Complaint:

- The Internal Complaints Committee shall proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable. Such an inquiry (with due conciliation as appropriate) shall be completed within a period of three months. Confidentiality of the complaint procedure will be maintained.



- ii. The Internal Complaints Committee shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to the complainant and the Respondent and the relevant witnesses provided by the complainant and the Respondent.
- iii. Complainants or witnesses will not be victimized or discriminated against while dealing with complaints.

D. Inquiry Report:

On the completion of such inquiry, the internal committee shall provide the report of its findings to the Managing Director & CEO within a period of 10 days from the date of completion of enquiry and such report be made available to the concerned parties. The Managing Director & CEO shall act upon the recommendation within 60 days of its receipt. In the event that the Internal Complaints Committee arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the Internal Complaints committee, and it shall notify the management of PCL of the same.

Penalties to Respondent:

If the sexual harassment complaint is proved prima-facie right to the Internal Complaints Committee based on the material and/or witness verified by them, then the Committee will recommend to the Managing Director & CEO punishment to the Respondent in terms of:

- Warning in writing.
- Immediate suspension from the services
- Immediate termination.
- May immediately refer the case based on the gravity and merits of the case to the local police/judiciary
- to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine.
- in case the respondent fails to pay the sum referred to in above, the Internal Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

Punishment for false complaints

Where the Internal Complaints Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is malicious or false, appropriate punitive action may be taken by the Managing Director & CEO as



per service rules applicable on recommendations of the committee.

Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by PCL shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.

Applicability

The Policy shall become operational from the date as may be approved by the Board of Directors of the Company.

For Prasol Chemicals Limited


Director

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