

POLICY ON PREVENTION OF SEXUAL HARASSMENT

INTRODUCTION:

As a Company, we are committed to conducting and governing ourselves with ethics, transparency and accountability and to this, we have developed governance structures, practices and procedures that ensure that ethical conduct at all levels is promoted across our value chain. We are dedicated to ensure that the work environment at all our locations is conducive to fair, safe and harmonious relations, based on mutual trust and respect, between all the associates of the Company. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner, whatsoever.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence, any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment.

1. POLICY:

- 1.1. Lords Chemicals Limited (herein after referred as "the Company") is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company, have the right to be treated with dignity.
- 1.2. Sexual harassment at the work place or other than work place is a grave offence and is therefore punishable.
- 1.3. The Ministry of Law and Justice, Government of India, has passed the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Act) with the avowed object of providing protection/prevention against sexual harassment of women at the workplace. The Act further provides for the redressal of complaints of sexual harassment.
- 1.4. This policy is in compliance with the provisions of the Act. It is also in keeping with our commitment to the adoption of best practices.

2. SCOPE AND EFFECTIVE DATE:

- 2.1. This Policy extends to all categories of employees of the Company, including permanent management and workmen, temporaries, consultants, trainees and employees on contract at their workplace or at client sites and is deemed to be incorporated in the service conditions of all stakeholders and comes into effect immediately.

3. DEFINITION:

- 3.1. "**Aggrieved Person**" means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- 3.2. "**Company**" means 'Lords Chemicals Limited'.
- 3.3. "**Employee**" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- 3.4. "**Employer**" means Chairman and Managing Director of Lords Chemicals Limited or any other Officer declared as such in its service rules.
- 3.5. "**Respondent**" means a person against whom the aggrieved person has made a complaint.
- 3.6. "**Sexual harassment**" would mean and include any of the following (in addition to the meaning provided under section 2 (n) of the Act):
- a) unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
 - b) unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals' sensibilities and affect her/his performance;
 - c) eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
 - d) act or conduct by a person in authority which creates an environment at the workplace that is hostile or intimidating to a person belonging to the other sex;
 - e) conduct of such an act at workplace or outside in relation to stakeholders of the Company, or vice versa during the course of employment; and
 - f) Any unwelcome gesture having sexual overtones.
- 3.7. "**Workplace**" includes:
- a) All offices or other premises where the Company's business conducted.

b) All company-related activities performed at any other site away from the Company's premises.

c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4. INTERNAL COMPLAINTS COMMITTEE:

4.1. A Complaints Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Managing Director may constitute such other committees as may be required for the purposes of the Act at the various locations of the Company.

4.2. Initially, and till further notice, the Complaints Committee will comprise of the following members:

(a) Presiding Officer who shall be a woman employed at a senior level at workplace amongst the employees.

(b) At least two members from amongst employees preferably committed to the cause of woman or who have had experience in social work or have legal knowledge.

(c) One member from amongst NGO or associations committed to cause of woman or any professional or a person familiar with the issues relating to sexual harassment.

Out of the aforesaid members at least two members will be of the same gender as that of the Complainant, subject to at least one-half of the total members so nominated being women.

(d) Every complaint received shall be forwarded to the ICC for investigation, inquiry.

(e) The committee members on need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.

4.3. Following will be the committee members:

NAME OF THE PERSON	DESIGNATION

4.4. You may reach the Committee and report the matter to the below committee
[ID: -----]

5. COMPLAINT REDRESSAL MECHANISM:

5.1. Any employee (hereinafter, "**Complainant**") who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.

5.2. 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 discreet investigation.

- 5.3. The Committee will hold a meeting with the Complainant within five working days of the receipt of the complaint.
- 5.4. At the first meeting, the Committee members shall hear the complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 5.5. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an enquiry shall be conducted and concluded.
- 5.6. In the event, the investigation leads that 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 in writing.
- 5.7. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

6. ENQUIRY PROCESS:

- 6.1. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- 6.2. The Committee shall prepare and hand over the Statement of Allegation to the person against whom 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.
- 6.3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 6.4. 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.
- 6.5. If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply originals/copies of such documents. Similarly, if the person against whom complaint is made, desires to tender any documents in evidence before the Committee he / she shall supply originals/copies of such documents. Both shall affix his / her signature on the respective documents to certify these them.
- 6.6. The Committee shall call upon all witnesses mentioned by both the parties.

- 6.7. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective cases.
- 6.8. The Committee shall complete the enquiry within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the General Manager - HR. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 6.9. The General Manager HR will direct appropriate action in accordance with the recommendation proposed by the Committee. The disciplinary action shall be commensurate with the nature of the gravity of the offence and shall include without limitation - Warning, written apology from offender, bond of good behaviour, transfer, debarring from supervisory duties, denial of employee benefits like increments/promotion/salary correction, etc., cancellation of specific work Assignment, suspension, dismissal.
- 6.10. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7. OTHER POINTS TO BE CONSIDERED:

- 7.1. The Committee may recommend to the General Manager – HR action which may include transfer or any of the other appropriate disciplinary actions.
- 7.2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- 7.3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 7.4. The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to General Manager HR.
- 7.5. In case the Committee find the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

8. ACTIONS:

- 8.1. 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 both Aggrieved and Respondent.
- 8.2. If the allegation against the Respondent has not been proved, the Committee may recommend not to take any action in the matter.

8.3. If the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer to consider sexual harassment as a misconduct and take action in accordance with the provisions of the Service Rules of the Company.

8.4. Such action shall be taken within 60 days of the receipt of report.

9. FALSE ALLEGATIONS:

9.1. 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.

9.2. On inquiry, if the Lords Chemicals Limited 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 ICC may recommend to take action against the person who made the complaint as per Service Rules. In such a case, malicious intent has to be established after an enquiry in accordance with the procedure prescribed, 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 ICC concludes, that he/she has given false evidence or produced forged or misleading documents.

9.3. The above provision is not to discourage employees from coming forward with complaints. Lords Chemicals Limited recognizes and expects certain claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to conclude as Sexual Harassment. Complaints falls under the above, shall not be considered to be false accusations.

10. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential to protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

11. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

12. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

13. AWARENESS:

- 13.1. All the women Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy.
- 13.2. An awareness program shall be conducted among the women employees on the Policy & formation of ICC.
- 13.3. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at work place.
- 13.4. Company shall display the notice showing the name of the ICC members suitably.
- 13.5. Company shall make a declaration regarding the Policy on sexual harassment every year in the annual report.

14. MISCELLANEOUS:

- 14.1. Company with the approval of Competent Authority 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 the Act.
- 14.2. Any such alterations or amendment or rescinding will be intimated to the employees. Nothing contained in these Policy 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.
- 14.3. The ICC shall prepare an annual report with the following details and shall submit the same to the Management to include in its annual report:
 - a) Number of Complaints of sexual harassment received during the year;
 - b) Number of complaints disposed of 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.
- 14.4. The above Annual Report and the MIS should be prepared by the ICC and shall be submitted before the end of each financial year to the Senior Management of the Company.

15. CONCLUSION:

- 15.1. 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 filing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.
- 15.2. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

- 15.3. The decision of the 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.