

SHREE PUSHKAR CHEMICALS & FERTILISERS LIMITED



Policy on Anti-Sexual Harassment of Women at Workplace

As approved by the Board of Directors of the Company

Place: Mumbai

Date: 30th March, 2021

1. Objective

Shree Pushkar Chemicals & Fertilisers Limited ('the Company' or 'Shree Pushkar') is committed to providing 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.

2. Definition of sexual harassment:

Includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:—

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature; .

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 (V) above, may amount to sexual harassment:—

- implied or explicit promise of preferential treatment in her employment; or
- implied or explicit threat of detrimental treatment in her employment; or
- implied or explicit threat about her present or future employment status; or
- interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- humiliating treatment likely to affect her health or safety.

3. Policy statement:

- a) All employees of Shree Pushkar will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All employees of Shree Pushkar will understand and appreciate the rights of the individual to be treated with dignity.
- c) All employees of Shree Pushkar are required to maintain a work environment, which is free from any kind of harassment.
- d) Shree Pushkar 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) Shree Pushkar employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

4. Internal Complaint Committee (ICC)

The Company shall constitute "Internal Complaint Committee" (ICC) to deal with the complaint. A female employee of Shree Pushkar 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. The Committee will be chaired by a senior female employee of Shree Pushkar as presiding officer. The members of the committee will be rotated every 3 years.

The Internal Complaint Committee shall comprise of as many members as the Board of Directors of Shree Pushkar may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The Internal Complaint Committee may constitute sub-committees for places where Shree Pushkar's factories and regional offices are located. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

The ICC shall have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company. The Board of Directors may re-constitute the ICC as may be required from time to time,

within the stipulated requirements under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

5. Procedure for dealing with complaints of sexual harassment:

- a) Any aggrieved woman should promptly report the complaint/ grievance to the Internal Complaints Committee (ICC) through the respective Manager, senior person or the Unit/Location/Department Head.
- b) Ideally, the complaint should be lodged immediately or within a reasonable period of 3 months from the date of incident/last incident either in writing or oral.
- 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. If needed, committee may nominate a senior person to head the investigation especially at other location of Shree Pushkar.
- d) The committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- e) Any victimization of, or retaliation against, the complainant or any Shree Pushkar employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- f) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the Committee post investigations may recommend disciplinary action against the complainant.

6. Conciliation:

The Committee shall have right to initiate conciliation between aggrieved woman and against person to settle down the matter before starting any investigation/ Enquiry at the request of aggrieved woman. Provided there shall not be made any monetary settlement in conciliation.

If the matter is settled down in Conciliation, the Committee shall forward its report to Company; however no further inquiry shall be conducted by ICC. The settlement report shall also forward to aggrieved woman and the respondent.

7. 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 any offices, godowns, warehouses, factories, Branches, of Shree Pushkar. If the outcome of an investigation by the Internal Complaints Committee shows that Sexual harassing behavior has taken place, the harasser shall face termination from employment, subject to disciplinary action taken up by them including termination of employment.

8. 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 Shree Pushkar 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. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

9. Applicability:

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

The Board of Directors of Company in their meeting approved following members and presiding officer to the “Internal Compliant Committee” are as under:

Mrs. Ranjana Makharia Employee	-	Presiding Officer
Mrs. Suchita Khanvilkar Sr. Purchase Manager	-	Member
Mrs. Aradhana Makharia Operational Executive - Sales	-	Member
Mr. Dilip Shah General Manager – Commercial	-	Member
Mr. Babaso Parle	-	External Member

For any communication/ complaint please Contact on 022- 42702525;

Or Email at- suchita@shreepushkar.com, dilip@shreepushkar.com.