

POLICY FOR PROHIBITION, PREVENTION & REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE

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This Policy is a revision and restatement of the Company's policy against sexual harassment to keep it up to date with changes in Indian law. This Policy extends to all employees of the Company and also to third parties associated with Rossari Biotech Limited (Rossari Biotech Ltd shall be hereinafter collectively referred to as RBL). The third party with respect to RBL would include all those on deputation, contract, temporary, part time, students, vendors, customers, consultants, auditors and visitors etc. who are associated with RBL and is deemed incorporated in the service conditions of all employees with immediate effect.

1. OBJECTIVE

Sexual Harassment violates an individual's dignity and may have significant adverse effects on the harassed individual, her/his family, colleagues and the entire organization.

RBL is an equal employment opportunity company and is committed to creating a safe and 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 and individuals, who deal with the Company, have the right to be treated with dignity and maintain a conducive work environment within the RBL premises

2. PROHIBITION OF SEXUAL HARASSMENT

(A) The Company strictly prohibits Sexual Harassment of any individual in its Work Environment, regardless of form or whether it is explicit or implied.

(B) "Sexual Harassment" means:

Article 51A (e) of the Constitution imposes on every citizen by way of fundamental duty the responsibility to renounce practices derogatory to the dignity of women. The Honorable Supreme Court passed judgment in the case of Vishakha and Ors. Vs. State of Rajasthan & Ors., (AIR 1997 SC 3012), and according to the recent legislation passed by the Parliament the Sexual Harassment of Women at Workplace (Prevention and Redressal) Act 2013 ('Act') wherein 'sexual harassment' has been defined as under: "Sexual harassment includes such unwelcome sexually determined behavior whether directly or by implication, as below;

(i) any conduct or behavior that is unwelcome and sexual in nature;

A few examples of such conduct are:

- (a) physical contact and advances;
- (b) a demand or request for sexual favours;
- (c) making sexually colored remarks;
- (d) showing pornography

- (ii) ***Any conduct, behavior or circumstance that is harassing in nature and supports one's own or another person's unwelcome conduct or behavior of a sexual nature.***

A few examples of such conduct/behavior/circumstances are:

- (a) Retaliating in any manner, for complaining against Sexual Harassment or giving evidence in support of such a complaint;
- (b) Promising preferential treatment in employment;
- (c) Threatening detrimental treatment in employment;
- (d) Threatening to adversely affect a person's present or future employment status;
- (e) Creating circumstances that interfere with a person's work
- (f) Creating an intimidating or offensive or hostile work environment;
- (g) Subjecting a person to humiliating treatment that affects her/his health or safety.

Any conduct or behavior that falls within the meanings defined in B(i) or (ii) above, will be deemed to be Sexual Harassment, whether it is implied or explicit and whether it is physical, verbal, non-verbal or in any other form. The examples listed above are only illustrative in nature and do not limit the above definitions B(i) and B(ii) in any manner.

- (C) **"Work Environment"** means:

- (i) Interactions amongst the Company's employees*, irrespective of location and timing;
- (ii) Interactions between the Company's employee and a third party during the course of employment or third party's business relationship with the Company;
- (iii) Interactions between an employee of the Company/third party having a business relationship with the Company and a visitor to the Company's premises/events.

** The term "employee" includes full-time and part-time, permanent as well as temporary/contract employees, individual consultants and trainees (paid as well as unpaid).*

- (D) In determining whether certain conduct/ behavior is unwelcome, the alleged victim's reasonable perception of how she/he felt as a result of such conduct/behavior will have greater relevance than the alleged harasser's intentions.

3. ROLE OF RBL IN PREVENTION OF SEXUAL HARASSMENT

- (A) The Company believes that Sexual Harassment can and must be eliminated through awareness and is committed to enforce the policy for providing protection against and to prevent sexual harassment at workplace to protect all its staff members, interns, trainees and visitors at work places.



- (B) The Company will spread awareness within its organization through periodic communications and shall hold training sessions for its staff (direct/indirect), interns, trainees and visitors about Sexual Harassment and its consequences for the organization and the individuals involved.
- (C) RBL will display this policy, at all its workplace in local languages. This policy will also consist of the names and contact details of the members of the Internal Complaints Committee and the procedure of lodging complaint.
- (D) The Company will also take other appropriate steps and shall impose penalties on the offender after due investigation and recommendation of the Internal Complaints Committee of the RBL as per the provisions of the said Act that may be required to prevent and eliminate Sexual Harassment from its Work Environment.
- (E) RBL would maintain a proper record of the cases dealt with and the action taken.
- (F) RBL is committed to maintain the full confidentiality of the cases both for the victim and for the alleged offender and committed for time bound actions

4. REDRESSAL OF COMPLAINTS

- (A) The Company has constituted an Internal Complaints Committee (“ICC”) to investigate and decide complaints of Sexual Harassment covered by this Policy. The Company may constitute more than one ICC to serve its various units and offices based on a balance of administrative convenience, accessibility to all employees and availability of individuals eligible for appointment to the ICCs at a particular location.
- (B) The names and contact details of the ICC members are provided in Appendix A to this Policy.
- (C) Anyone who faces or is affected by Sexual Harassment in the Company’s Work Environment may make a complaint to the ICC by submitting a complaint of the alleged incident to any member of the Committee in writing with his/her signature or through email on herewe@rossarimail.com within 10 days of occurrence of incident.
- (D) Aggrieved person or any other person who is aware of the happening of such incidence can lodge complaint through telephone, email, letter, fax or can make a verbal complaint. The application must contain all the details of the incident, as well as the name of the alleged offender.



- (E) The ICC will provide assistance in making the complaint as may be required. The ICC may also require the Company to implement measures to protect the complainant, alleged victim and witnesses against any retaliation or to maintain a safe and healthy working environment while the complaint is pending.
- (F) The procedures and time frames for filing, investigating and deciding complaints; and rights and obligations of the parties involved in the complaint are detailed in the Grievance Redressal Procedures (see Appendix B to this Policy).
- (G) After receiving the application, the member receiving the complaint will directly contact other Committee members and shall call a meeting of Committee members to discuss the complaint and shall take appropriate steps to investigate the Complaint.
- (H) If the ICC requires you to attend an inquiry hearing or to cooperate for the purposes of inquiring into a complaint, it is mandatory for you to attend and/or cooperate as requested.

5. Internal Complaints committee:

RBL will form a committee to deal with complaints of sexual harassment at the workplace for the employees and third parties. The Committee will consist of seven members and shall be governed by the rules as framed by legislations enacted from time to time.

6. The ICC Committee will consist of:

- (A) **Complaints Committee:** The Committee and the management will meet once in three months and shall prepare a Report on the cases, if any lodged with the Committee. This body will also take preventive action to avoid such incidence of sexual harassment at the work place.
- (B) **ICC Members:** RBL's 7 Member committee will consist of following
 - (i) 50% of the ICC members appointed will be females.
 - (ii) 1 Senior Female employee will be appointed as the presiding officer.
 - (iii) 1 Female External Member (Legal professional , Social Worker, person who has worked for women's rights)will be appointed by RBL to ensure Transparency in procedures, delivery of justice and ensure unbiased final judgment.
- (C) **ICC Member Service Terms :** Every member of the Committee shall hold the position for a period not exceeding 3 years from the date of nomination. The same person cannot not be nominated as member of the committee for more than 2 terms.

7. Principles of Natural justice

The principal of natural justice will be adopted during investigation. The Committee shall immediately proceed with the Inquiry and communicate the same to the Complainant and alleged offender. Thus, both parties, the applicant as well as the alleged offender, will be given an opportunity to represent their case and produce witnesses or evidence in support of their allegations and defense.

8. PUNISHMENT FOR SEXUAL HARASSMENT

(A) The Company shall take action as recommended by the ICC against any employee who is found guilty of Sexual Harassment after due inquiry by the ICC. Such action may include one or more of the following:

- A warning,
- A transfer
- Decreased remuneration
- A written apology to the victim
- Mandatory counseling sessions or community service,
- Fine of an amount as decided by the ICC
- Consideration in annual performance appraisal
- Withholding of promotions or increments
- Suspension from service
- Termination of service

(B) Any person who is found guilty of Sexual Harassment after due inquiry by the ICC shall also be liable to pay compensation to the harassed person as may be decided by the ICC in accordance with the law.

(C) The following acts of Sexual Harassment by a man are also criminal offences under the Indian Penal Code and are punishable as described below:

- (a) physical contact and advances involving unwelcome and explicit sexual overtures;
- (b) a demand or request for sexual favours;
- (c) showing pornography against the will of a woman;
- (d) Making sexually colored remarks.

The offences under (a), (b) and (c) are punishable with rigorous imprisonment of up to 3 years and a fine of an amount as may be decided by a court. The offence under (d) is punishable with simple or rigorous imprisonment of up to 1 year and/or a fine of an amount as may be decided by a court.



9. Recommendations:

Recommendations will be made by the Committee to the management committee of RBL to take appropriate action against the alleged offender if the allegations are proved against the alleged offender and if it is found that the allegations were false or were made with malicious intentions strict actions would be taken against such person. The complaints committee must endeavor to submit the report within a period of (30 Days) thirty days from the receipt of the complaint.

10. CONSEQUENCES OF MAKING FALSE OR MALICIOUS COMPLAINTS

If the ICC concludes that a complaint is intentionally false or malicious or that any person has intentionally provided false or misleading evidence of any kind, the person who knowingly made such a false or malicious complaint or knowingly provided such false or misleading evidence may be punished in the same manner as described in Para 8 (A) and (B) above. A complaint will not be automatically treated as false or malicious just because of failure to prove that Sexual Harassment occurred.

11. CONFIDENTIALITY

Privacy and dignity of individuals must be respected and matters of Sexual Harassment must be treated with great sensitivity. Therefore, all information pertaining to any complaints of Sexual Harassment should be treated as private and confidential and should not be disclosed to anyone other than the ICC or the parties involved in the complaint and, to a limited extent, only to those persons strictly on a “need to know” basis and who are expected to implement the decisions of the ICC. Anyone breaching this obligation of confidentiality shall be liable to pay the Company a fine of Rupees Five Thousand (Rs. 5000) and may also be punished as per recommendations of the ICC.

12. Contact details of members

The contact details of members of the Committee will be made available to all associates of RBL.

Complaints Redressal Committee Namely: **“W@W! Goonj Nirbhayata Se”!!** The Committee has been constituted by the Management to consider and redress Complaints against Sexual Harassment (POSH) at work place of RBL comprises of the following members, currently (See APPENDIX A):

13. AMENDMENTS

The Company may amend this Policy and the related Appendices from time to time to reflect any changes in the applicable laws or even otherwise to ensure that its work environment is free from Sexual Harassment.



14. MISCELLANEOUS

Other Important Rules applicable to the Complaints Process:

- (1) The Accused should refrain from interacting with the Complainant and any of the Complainant's witnesses or retaliating against them in any manner.
- (2) Both parties and their respective witnesses shall appear before the ICC whenever required for the purposes of the Inquiry. They shall also produce all necessary information and/or documents demanded by the ICC in relation to inquiry of the Complaint.
- (3) During the pendency of the Inquiry, the Complainant may request the ICC to:
 - (a) transfer the Complainant or the Accused to another office of the Company;
 - (b) grant him/her leave from work;
 - (c) prohibit the Accused from appraising the work performance of the Complainant and his/her witnesses. The ICC will consider such requests but is not bound to accept the same if it believes the situation does not warrant it. If the ICC accepts the request, it will recommend implementation of the same to the Company. However, it cannot recommend grant of leave exceeding 3 months. The Company will report back to the ICC on the implementation of the recommendations.
- (4) Information regarding the Complaint or the inquiry or the names or addresses of the parties involved or action taken; shall not be disclosed to anyone except those involved in the inquiry and implementation of the ICC's recommendations.

APPENDIX A
INTERNAL COMPLAINTS COMMITTEE DETAILS

No.	Name	Role	Email
1	Mrs. Manjiri Paranjape Vice President – R&D	Presiding Officer	manjiri@rossarimail.com
2	Mrs. Saroj Belekhar Deputy Manager - Procurement	Internal Member	saroj.belekhar@rossarimail.com
3	Ms. Parul Gupta Company Secretary	Internal Member	cs@rossarimail.com
4	Mr. Aadesh Sakpal Asst Manager - Administration	Internal Member	admin2.ho@rossarimail.com
5	Ms. Shazia Tyagi Asst. Manager - QC	Internal Member	qa.hul@rossarimail.com
6	Mr. Neeraj Vats AGM - HR	Internal Member	neeraj.vats@rossarimail.com
7	Mrs. Vaidehi Barve	External Member	vb@ecrossings.in

APPENDIX B GRIEVANCE REDRESSAL PROCEDURES

