

ALKA INDIA LIMITED

POLICY FOR THE PREVENTION, PROHIBITION AND PUNISHMENT OF SEXUAL HARASSMENT OF WOMEN

PREAMBLE

We as a Company respects the dignity of all employees working for the Company irrespective of their gender or hierarchy and we expect responsible conduct and behavior on the part of all our employees at all levels. Providing for a safe and congenial work environment to all employees is an integral part of the Company's employment policy.

The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

Our Company adopts the guidelines & procedures to prevent, prohibit and punish sexual harassment of women at the workplace as per The Sexual Harassment of Woman At Workplace (Prevention, Prohibition & redressal) Act, 2013. Our Company is committed to providing for all women the workplace free from sexual harassment, intimidation and exploitation. Every woman shall have a right to be free from Sexual Harassment and the Right to Work in an environment free from any form of Sexual Harassment.

The right of women to protection from sexual harassment and the right to work with dignity are recognized as universal human rights. Sexual harassment is a clear violation of woman's right to gender equality as guaranteed under Articles 14 and 15, her right to live with dignity under Article 21 and her right to work with dignity in a safe environment under Article 19 (1) (g) of the Constitution of India.

APPLICABILITY

This Policy applies to all the employees, workers and trainees of the Alka India Limited (Whether in the office premises or outside while on assignment).

OBJECTIVE / PURPOSE:

This policy has been framed with a view to:

- Promote a workplace based on equality & respect.
- Provide a safe and congenial work environment.
- Awareness & sensitization about sexual harassment at the workplace.
- Prevent sexual harassment.
- Provide formal and informal mechanism for redressal in case of complaint of sexual harassment at the workplace.
- Define the implications and outcome of sexual harassment.
- Ensure protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

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.

COMPLAINT REDRESSAL COMMITTEE

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

Name	Designation
Mrs. Jayshree vilas Gangurde	Chairperson (Independent Director)
Ms. Pooja Sangoi	Assistant Company Secretary
Ms. Poonam Pokiya	Assistant Company Secretary

REDRESSAL PROCESS

If you are being harassed:

- (a) Tell the accused that his/ her behaviour is unwelcome and ask him/her to stop.
- (b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- (c) File a complaint as soon as possible. If after asking the accused to stop his/her behaviour, the harassment continues, report the abuse to the Complaints Committee formed for this purpose.

Dealing with the Complaint

- It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the Complaints Committee of any instance or behavior of sexual harassment by a co-worker towards another employee.
- The concerned employee shall give his complaint in writing to the Chairperson of the Committee giving details of the incident within a week of its occurrence.
- Once the complaint is received, it will be kept strictly confidential.
- The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.
- The Committee shall ensure that a fair and just investigation is undertaken immediately.
- Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.
- The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer.
- Where the aggrieved woman is unable to make complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

DISCIPLINARY ACTION

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

CONFIDENTIALITY

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

PROTECTION AGAINST RETALIATION

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused.

DOCUMENTATION

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.

COMPLAINTS MADE WITH A MALICIOUS INTENT

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

EMPLOYER TO INCLUDE INFORMATION IN ANNUAL REPORT

As per Section 22 of the Sexual Harassment of Woman At Workplace (Prevention, Prohibition & redressal) Act, 2013, the employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of his organization.

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.