



ANTI – SEXUAL HARASSMENT POLICY

1. PHILOSOPHY

GMM Pfaudler Limited ("Company") is an equal opportunity employment company, without regard or prejudice to race, caste, religion, colour, marital status, sex, age, nationality, disability of its staff (Employees) or colleagues. The Company also believes that all employees of the Company have the right to be treated with dignity. The Company deems that Sexual Harassment at the Workplace is a grave offence and is responsible for identifying and preventing Sexual Harassment; the Company aims to develop a culture of "zero tolerance" for any form of Sexual Harassment at the Workplace. The Company will respond promptly to reports of Sexual Harassment and will take appropriate steps to discipline behaviour that violates this Anti-Sexual Harassment Policy ("Policy"). This Policy is applicable across the Company in all of its Workplace(s), the definition of which is set out hereunder.

2. LEGISLATIVE BACKGROUND AND REQUIREMENT

The Government of India has notified the Sexual Harassment of Women at the Workplace (Prevention, Prohibition Redressal) Act, 2013 ("Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("Rules"). Both the Act and the Rules have come into force with effect from December 9, 2013. The Act and the Rules were both drawn up and passed to facilitate the guidelines laid down by the Supreme Court of India in the judgement of 'Vishaka v. State of Rajasthan', to ensure that women, in particular, are protected against Sexual Harassment at all work places, be it public or private, and to create work environments and working conditions that enforce their right to equality, life and liberty guaranteed to all citizens by the Constitution of India.

In order to comply with the provisions of the Act, every organization has to formulate and implement an Anti- Sexual Harassment Policy ("Policy").

This Anti-Sexual Harassment Policy gives effect to the legal provisions contained in the Act and the Rules relating to protection against Sexual Harassment at Workplace and for establishing the necessary mechanisms for redressal of complaints of Sexual Harassment and for matters connected therewith or incidental thereto.

This Policy is meant to educate the Employees about what constitutes Sexual Harassment and has been formulated to prohibit, prevent and deter the commission of any acts of Sexual Harassment at the Workplace, and in the event of such an occurrence, creates a fair mechanism which is also accessible and just to deal with such conduct and redress complaints thereof.



3. APPLICABILITY

- a. This Policy is a policy for the protection of women. All complaints made by aggrieved women to the Internal Committee (s) of the Company in the manner provided herein shall be addressed in accordance with this Policy and applicable law. Women, also includes, 'transwomen' as recognised by the Transgender Persons (Protection of Rights) Act, 2019 and by various Indian courts. In the event that any other person wishes to complain against any form of harassment or sexual harassment, he/they may complain in accordance with the Company's Disciplinary Policy.
- b. In this Policy "Employee/s" shall include a person carrying out any work on behalf of the Company and may have been hired as Permanent, Temporary, Contracted basis or on a Retainer, part-time etc. either directly or indirectly or through any vendor organization. Further, this Policy extends to all Employees of the Company whether permanent, temporary, on training, on contract and is deemed to be incorporated in the service conditions of all Employees.
- c. It also extends to outsiders who come in contact with the Employees of the Company and / or with the Workplace and those who make allegations against Company Employees or complain of incidents that have occurred in the Company Workplace.
- d. The Company will also not tolerate Sexual Harassment of the Employees of the Company, if engaged in, from clients, contractors, vendors, technicians, those appointed by the Company to render specific services for the business and day-to-day operations and includes but is not limited to any other business associates or staff of or in relation to the Company.
- e. This Policy shall extend to:

Employees whether in the office premises or outside (including but not limited to remote work, or virtual work {online} or on travel, assignment, deployment or secondment) the Company's office (s) situated at;

 - i. Vithal Udyognagar, Anand- Sojitra Road, Karamsad – 388 325, Gujarat, India and /or
 - ii. 902, Lodha Excelus, Commercial Tower 1, New Cuffe Parade, Sewri-Chembur Road, Mumbai 400037, Maharashtra, India; and/or
 - iii. any other premises where the Company's business is conducted in respect of instances and complaints of Sexual Harassment at the Workplace (the definition of the Company's Workplace is as below in Section 4.6 of this Policy);
- f. All Company-related activities performed at any other site away from the Company's premises;

- g. Incidents of Sexual Harassment reported by Company's Employee as a result of an act by a thirdparty or outsider while on official duty i.e., during the course of work or during activities necessitated by workplace requirements or interactions.

4. DEFINITIONS

Except where the context otherwise requires, the following words and expressions shall have the following meanings:-

- 4.1 "AGGRIEVED WOMAN" with respect to the Act in relation to the workplace is a woman of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent. As per the judgement of the Hon'ble High Court of Delhi in the matter of 'Anamika vs. Union of India' this expression shall mean and include a 'Transwoman' or a 'Transgender Person' who identifies as a woman.
- 4.2 "COMPLAINT" means information, either oral or written, made by the Aggrieved Woman. However, any complaint made orally must be reduced to writing with the assistance of the Internal Committee members.
- 4.3 "EMPLOYEE" for the purpose of this Policy, in addition to the elucidation in Section 3 (a) and 3 (b) hereinabove, means and includes any person hired by the Company, whether as a consultant or as an employee on the rolls of the Company who is employed for any work on regular, temporary, ad-hoc or daily wage basis, directly or through an agent, including a contractor, with or, without the knowledge of the Company's management, whether for remuneration or not, or working on voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice, article clerk or called by any other such name.
- 4.4 "SEXUAL HARASSMENT" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):
 - a. Physical contact and advances; or
 - b. A demand or request for sexual favours; or
 - c. Making sexually coloured remarks; or
 - d. Showing pornography; or
 - e. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.



Additionally, any of the following, in relation to or connected with the above, will constitute sexualharassment:

- a. Implied or explicit promise of preferential treatment in her employment ;
or
- b. Implied or explicit threat of detrimental treatment in her employment; or
- c. Implied or explicit threat about her present or future employment status;
or
- d. Interference with her work or creating an intimidating or offensive or hostile work environmentfor her; or
- e. Humiliating treatment likely to affect her health or safety.

Important Note: It is the impact or effect of the behaviour of the recipient and not the intent of the offender that is critical in an assessment of such issues/cases.

What Does Not Amount to Sexual Harassment:

Any expressly welcome behavior that is based on mutual attraction, respect and/or friendship is not sexual harassment. However, even in the case of formerly welcome behaviour, once unwelcomed or discomfort is expressed, the same behavior may amount to sexual harassment. Moreover, the Company requires that any romantic relationships between co-workers, who are in any manner in senior/subordinate to each other in the Company workplace, should be voluntarily disclosed at the first possible instance to their concerned HR representative. The onus of such disclosure shall lie upon the person who is professionally senior amongst the persons in the relationship. All such disclosures shall be held in the strictest of confidence and shall only be disclosed to the Internal Committee for the purposes of an ongoing inquiry, if and when called upon. In the absence of disclosure, all such relationships may be considered as conflict of interest and where a complaint is made alleging that the relationship was entered into under duress, the same may be presumed.

- 4.5 "RESPONDENT" means the person who is alleged or reported to have committed an act of SexualHarassment and against whom the Aggrieved Woman/ Complainant has made a Complaint underthis Policy in terms of Section 9 of the prevailing Act.



4.6 "WORKPLACE": In addition to the place of work [Registered office / Corporate office/ Sales & Service Offices/ Factories] it shall also include any place where the aggrieved woman / respondent visits in connection with Company's work, during the course of and/or arising out of employment/ contract/ engagement with GMM Pfaudler Limited, including public or private transportation provided by the Company. 'Workplace" shall also include any and all locations and places of work as envisaged under the Act in Section 2 (o), sub-sections (i), (ii), (iii), (iv), (v) and (vi) and those situations envisaged in Article 3 (d) (ii) of this Policy, including but not limited to working remote or Working from Home (WFH) i.e. work rendered virtually, electronically or telephonically.

4.7 "INTERNAL COMMITTEE": The Internal Committee (the "IC") shall hereinafter also be referred to as the Internal Committee in light of the 2016 Amendment suggesting the same and the IC shall consist of:-

- a) A Presiding Officer who shall be a woman employed at senior level;
- b) Not less than two Members from amongst the Employees preferably committed to the cause of women;
- c) One (external) Member from an NGO or association committed to the cause of women or person familiar with the issues relating to the Sexual Harassment.
- d) At least one half of the total Members nominated shall be women.

The Presiding Officer and Members shall hold office for a period of not more than 3 years.

The Company has constituted IC at all offices / locations of the Company (as is required by the law) to redress the complaints of Sexual Harassment.

IC at the corporate office shall deal with complaints received from the Employees of all other existing sales & service offices of the Company or such other offices or workplace that may be established/ acquired/ owned by the Company in future.

The Name(s) of the Members of the Internal Committee is as per 'Annexure A' of this Policy and any change in such composition shall be effected in the policy.

An order constituting the IC shall be displayed at each office of the Company at a conspicuous place and on the internal network/Intranet of the Company.

5. CONSTITUTION OF ICC

An ICC/IC shall consist of:

- a. A Presiding Officer who shall be a woman employed at senior level;
- b. Not less than two Members from amongst the Employees preferably committed to the cause of women;
- c. One Member from and NGO or association committed to the cause of women or person familiar with the issues relating to the Sexual Harassment;
- d. At least one half of the total Members nominated shall be women.

6. REDRESSAL PROCESS

6.1 COMPLAINT

- (i) Any woman (Aggrieved Woman) who feels that she is being sexually harassed, may submit a Complaint of the alleged incident to any member of the IC in writing within three (3) months of occurrence of incident, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The IC may, after recording its reasons in writing, extend the time limit if it is satisfied with the circumstances that led to preventing the Aggrieved Woman (AW) from making the Complaint within three (3) months; the complaint may also be made vide email to the Presiding Officer or any of the ICC/IC Members.
- (ii) In case of any difficulty in filing the Complaint in writing, the Presiding Officer/Members of the IC shall provide reasonable assistance to the Aggrieved Woman to file a written Complaint;
- (iii) A Complaint may also be made by a legal heir or any of the persons specified under sub section (2) of Section 9 of the Act read with Rule 6 of the Rules, where the Aggrieved Woman is unable to do so, on account of any kind of incapacity;

6.2 SETTLEMENT THROUGH CONCILIATION

- (i) At the request of the Aggrieved Woman/Complainant the IC, shall, prior to initiating an inquiry, take steps to settle the matter between the Aggrieved Woman and the Respondent through conciliation. The IC shall record the terms of any such settlement reached between the Aggrieved Woman and the Respondent;



- (ii) If the Respondent fails to comply with the terms and conditions of the Settlement, the Aggrieved Woman may inform the IC of the same for further action, as provided under the Act.

6.3 INQUIRY AND ACTION

- (i) During the pendency of an inquiry, the IC shall, on the request made by the Aggrieved Woman, grant interim relief in accordance with the provision of section 12 of the Act or if the IC believes that such interim action is pivotal to creating a safe and supportive work environment for the Aggrieved Woman;
- (ii) Where both the Aggrieved Woman and the Respondent are Employees of the Company, the IC will give each of them an opportunity of being heard at the time of inquiry, and will make available to each, a copy of its findings enabling them to make representation in respect of such findings, before the IC;
- (iii) The IC may terminate the inquiry proceedings or decide ex-parte on the Complaint, if the Complainant or the Respondent does not, without sufficient cause, present himself/herself for 3 (three) consecutive hearings convened by the IC.
- (iv) The quorum for convening a meeting of the IC for the purpose of an inquiry shall be a minimum of three (3) members of the IC, including the Presiding Officer.
- (v) The IC shall where possible complete the inquiry within a period of 90 (ninety) working days and communicate its findings and its recommendations for action to the Company's management in a report, within 10 working (10) days of completing the inquiry; such time taken for inquiry however shall be subject to the facts and circumstances of each complaint/case and force majeure.
- (vi) A copy of the report shall also be made available to the Aggrieved Woman and the Respondent;
- (vii) The report of the IC shall be treated as a final report on the basis of which the disciplinary action can be taken against the Respondent within sixty (60) days of its receipt. In the event the IC concludes that allegations of Sexual Harassment have been established, it shall in its report to the Company, recommend that action against the Respondent be taken in accordance with the Company's service rules (if any) and/or deduct such sum as it considers appropriate from the salary/wages of the Respondent to be paid to the AW or any other act



in accordance with the provision of the Act. The Company's Management will direct appropriate action in accordance with the recommendation proposed by the IC;

- (viii) Appropriate disciplinary action recommended by the IC in such cases which include:
 - a. Warning
 - b. Written apology from offender
 - c. Bond of good behaviour
 - d. Debarring from supervisory duties
 - e. Denial of employee benefits like increments/promotion/salary correction etc.
 - f. Cancellation of specific work Assignment
 - g. Suspension
 - h. Dismissal
 - i. Other actions / outcomes expressly provided for in the subject Act.
 - j. It is also of note that the Respondent's position in the Company and the criticality of his role/work shall not be of any hinderance to the disciplinary action taken.

- (ix) In the event, the allegations are not substantiated, the IC shall recommend to the Company that no action is required to be taken and close the enquiry by recording reasons in writing. However, if the IC finds that in order to prevent further issues arising between the parties or in the interests of the workplace that actions which are not penalising in nature such as counseling, transfer, change in reporting etc are required, the same may be recommended by the IC as preventive measures.

- (x) In the event that the IC finds that the allegations albeit substantiated, do not fall or that the allegations as prima facie made out in the Complaint does not fall under the purview of Sexual Harassment at the workplace, the IC may transfer the complaint to the appropriate forum within the company or any other authority under law.

7. APPEAL

Any person aggrieved by the recommendations or non-implementation of the recommendations made by the IC, may prefer an appeal, in accordance with the law within ninety (90) days of the recommendations.

8. ANNUAL REPORT

The IC shall submit in at the end of each calendar year an Annual Report which contains number of cases received, disposed, pending for more than ninety (90) days, number of workshops against sexual harassment carried out and nature of action taken to the Company (Board of Directors) and to the District Officer as the case may be.

9. FALSE COMPLAINT / EVIDENCE

Duty of Good Faith

- (i) If on an inquiry, the Complaint is found to be false or malicious, or that a witness has given misleading evidence, the Complainant or the witness, as the case may be, shall be liable for appropriate disciplinary action by the IC. Such malicious intent must be established after an inquiry;
- (ii) In the event that malicious intent on the part of a complainant is established after an inquiry, the IC may recommend to subject such an individual to the same types of actions as can be recommended against a respondent against whom an allegation of sexual harassment has been proved.
- (iii) A mere inability or insufficiency to substantiate a Complaint shall not be considered as grounds for taking action.
- (iv) All Employees of the Company have a responsibility to stop others and report acts of Sexual Harassment at the workplace. Any employee who is the recipient of any unwelcome sexual behaviour as described by this policy or knows of the occurrence of such harassment to anyone else, is expected to report the same at the earliest.
- (v) Managers and superiors have a further responsibility to promote awareness of this policy within their work area and report any acts of Sexual Harassment that may be brought to their attention whether in writing or otherwise. In case the employee communicates verbally to his/her Team manager, HR Manager, or any other employee about any incident/s, they are encouraged to forward the complaint in writing to the Internal Committee or send an email to the Presiding Officer.

Non-Retaliation

No person shall be subject to harassment, intimidation, or retaliation of any kind for having brought a good faith complaint of prohibited harassment or having acted as a bonafide witness / whistle blower.

10. CONFIDENTIALITY

- (i) Any and all persons entrusted with the duty to manage a Complaint, inquiry or any recommendation or action to be taken under the Act, Rules and this Anti-Sexual Harassment Policy shall not disclose the name, address, identity or any other particulars that can in any way reveal the identity of the Aggrieved Woman, the witnesses or the Respondent unless otherwise required by law or in order to resolve the complaint i.e. hand over the Report of Findings to the parties, take action on the Recommendations of the IC in the Report of Findings and so on.



- (ii) In case of any violation, the concerned person shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist, in such manner as may be prescribed by law.
- (iii) All parties to an IC complaint shall be made aware of the strict covenants of confidentiality and non-retaliation that govern all IC proceedings. Parties herein include but are not limited to the Aggrieved Woman, the Respondent and witnesses so named by the parties or called upon by the IC in the course of the inquiry. All details shared by the parties shall be maintained in strict confidence and all of the parties shall be made aware that they are not to discuss any facet of the complaint or IC investigations with anyone outside the IC panel. Parties shall also be made aware that retaliation or any attempt to influence the parties to withdraw the complaint or give false evidence shall be met with disciplinary action and in grave cases may even be lead to separation/termination of the Employee. If any support in the form of counselling or assistance is required to any of the parties, the same shall be made available to them by the Company and free of cost to them.

11. ROLES AND RESPONSIBILITIES

The Company – represented by its management or such Employee who is designated by the Management – shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Anti-Sexual Harassment Policy. The list of IC Members for the Company locations is annexed at Annexure A and will be revised from time to time as per the requirement of the law.

- (i) The Company shall provide safe working environment at the Workplace for all women which shall encourage women's participation in the workplace thereby adversely positively supporting their social and economic empowerment and the goal of inclusive growth.
- (ii) The IC shall prepare a report with details of all of the Complaints received at the end of every calendar year for submission to Company's management and the Company shall submit the same to the District Officer or the local government as the case may be.
- (iii) It is both, the duty and obligation of the Company to provide necessary communication and training with respect to this Policy to all of its Employees.
- (iv) The Company shall ensure that this Policy is communicated, explained and handed over at the time of induction of every new joinee/Employee.



- (v) The Company, in consultation with the IC, will be responsible for providing clarifications to staff and colleagues with respect to any queries related to this Policy, as and when required.
- (vi) The Company shall ensure implementation of this Policy in line with overall Anti-Sexual Harassment guidelines and directions as also the Act, and the Company shall provide appropriate training on the same.
- (vii) The Company – represented by its management or such Employee who is designated by the Management – shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Anti-Sexual Harassment Policy.
- (viii) The Company shall display at any conspicuous place in the Workplace, the penal and other disciplinary consequences that may be the outcome of an inquiry of Sexual Harassment and the order constituting the IC of that specific location/office.
- (ix) The Company shall provide necessary facilities and amenities to the IC as may be required to deal with all complaints received in this regard to support the inquiry/conciliation process.

12. REVIEW OF ANTI- SEXUAL HARRASMENT POLICY

This Anti- Sexual Harassment Policy shall be reviewed preferably once in three (3) years, or as and when there are any amendments to the Act or Rules, or pertinent Supreme Court judgements or Government Orders on the issue of Sexual Harassment at the Workplace, whichever is the earliest.



ANNEXURE A

Members of Internal Committee ("IC") along with their contact details are as mentioned below:

MANUFACTURING FACILITIES:

Karamsad IC:

S.N.	Name	Designation	E-mail id	Contact No.
1	Ms. Mittal Mehta	Company Secretary - Presiding Officer	mittal.mehta@gmmpfaudler.com	98339 05128
2	Ms. Diana James	Deputy General Manager, HR & Admin - Member	diana.james@gmmpfaudler.com	90042 73536
3	Mr. Dhiren Panchal	Deputy General Manager, Quality - Member	dhiren.panchal@gmmpfaudler.com	82380 03916
4	Mr. Aditya Gopal	Manager, HR & Admin - Member	aditya.gopal@gmmpfaudler.com	86522 42924
5	Ms. Devika Singh	Advocate – Cohere Consultants LLP - External Member	devika.singh@cohereconsultants.com	98189 60361

Ahmedabad IC: (For grievances at Vatva factory & sales office at Ahmedabad and Ankleshwar)

S.N.	Name	Designation	E-mail id	Contact No.
1	Ms. Mittal Mehta	Company Secretary - Presiding Officer	mittal.mehta@gmmpfaudler.com	98339 05128
2	Mr. Dhaval Rajput	General Manager, Finance & Accounts - Member	dhaval.rajput@gmmpfaudler.com	98197 71114
3	Ms. Karuna Dusane	Manager – HR & Admin- Member	karuna.dusane@gmmpfaudler.com	91686 65735
4	Mr. Rahul Marothia	General Manager, Information Technology – Member	rahul.marothia@gmmpfaudler.com	75748 99377
5	Ms. Devika Singh	Advocate – Cohere Consultants LLP - External Member	devika.singh@cohereconsultants.com	98189 60361



Nacharam IC: (For grievances at Nacharam factory)

S. N.	Name	Designation	E-mail id	Contact No.
1	Ms. Mittal Mehta	Company Secretary - Presiding Officer	mittal.mehta@gmmpfaudler.com	98339 05128
2	Ms. Karuna Dusane	Manager – HR & Admin- Member	karuna.dusane@gmmpfaudler.com	91686 65735
3	Mr. Aditya Gopal	Manager, HR & Admin - Member	aditya.gopal@gmmpfaudler.com	86522 42924
4	Ms. Devika Singh	Advocate – Cohere Consultants LLP - External Member	devika.singh@cohereconsultants.com	98189 60361

CORPORATE OFFICE:

Mumbai IC: (For grievances at Mumbai and Roha)

S.N.	Name	Designation	E-mail id	Contact No.
1	Ms. Mittal Mehta	Company Secretary - Presiding Officer	mittal.mehta@gmmpfaudler.com	98339 05128
2	Ms. Diana James	Deputy General Manager, HR & Admin - Member	diana.james@gmmpfaudler.com	90042 73536
3	Mr. Dhaval Rajput	General Manager - Finance & Accounts- Member	dhaval.rajput@gmmpfaudler.com	98197 71114
4	Ms. Ria Anand	Legal Associate - Member	ria.anand@gmmpfaudler.com	97924 65964
5	Ms. Devika Singh	Advocate – Cohere Consultants LLP - External Member	devika.singh@cohereconsultants.com	98189 60361



SALES & SERVICES OFFICES:

Mumbai Sales office IC: (For grievances at sales office at Andheri)

S.N.	Name	Designation	E-mail id	Contact No.
1	Ms. Mittal Mehta	Company Secretary - Presiding Officer	mittal.mehta@gmmpfaudler.com	98339 05128
2	Ms. Diana James	Deputy General Manager, HR & Admin - Member	diana.james@gmmpfaudler.com	90042 73536
3	Mr. Dhaval Rajput	General Manager - Finance & Accounts- Member	dhaval.rajput@gmmpfaudler.com	98197 71114
4	Ms. Ria Anand	Legal Associate - Member	ria.anand@gmmpfaudler.com	97924 65964
5	Ms. Devika Singh	Advocate – Cohere Consultants LLP - External Member	devika.singh@cohereconsultants.com	98189 60361

Hyderabad IC: (For grievances at sales offices at Hyderabad and Vizag)

S. N.	Name	Designation	E-mail id	Contact No.
1	Ms. Mittal Mehta	Company Secretary - Presiding Officer	mittal.mehta@gmmpfaudler.com	98339 05128
2	Ms. Diana James	Deputy General Manager, HR & Admin - Member	diana.james@gmmpfaudler.com	90042 73536
3	Ms. Varsha Reddy	Asst. Manager, Glass lined Inside Sales - Member	varsha.reddy@gmmpfaudler.com	70934 01792
4	Mr. Aditya Gopal	Manager, HR & Admin - Member	aditya.gopal@gmmpfaudler.com	86522 42924
5	Ms. Devika Singh	Advocate – Cohere Consultants LLP - External Member	devika.singh@cohereconsultants.com	98189 60361



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