

KOTHARI INDUSTRIAL CORPORATION LIMITED

POLICY ON PREVENTION OF SEXUAL HARRASMENT

1. POLICY STATEMENT:

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. It is thus in acknowledgement of and consonance with these values, that we are dedicated to ensuring 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. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors etc. 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. Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy. All managers to ensure that they themselves as well as their team, including new joiners, are aware of the Policy on Prevention of Sexual Harassment in place and strictly adhere to it. Company will promptly investigate all complaints and take appropriate action, up to and including termination of employment.

2. APPLICABILITY:

This policy will extend to all associates of the Company including those employed on regular, temporary, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied (hereinafter referred to as Associates).

This policy will extend to all associates of the Company including those employed on regular, temporary. The policy also extends to those who are not employees of the Company, such as customers, visitors, vendors, suppliers , contract worker, probationer, trainee, apprentice or called by any other such name, but are subjected to sexual harassment at the Premises (defined hereinafter) of the Company.

3. SCOPE:

The scope of the Policy is restricted to the following for all Associates:

- i. business locations of the Company

ii. any external location visited by Associates due to or during the course of their employment with the Company such as business locations of other Companies/entities, guest houses etc.

iii. any mode of transport provided by the Company (or a representative of the Company) for undertaking a journey to and from the aforementioned locations

iv. at any other location whether in India or outside India.

4. DEFINITIONS:

Aggrieved Associate means in relation to a workplace, any individual, of any age whether employed in the Company or not, who alleges to have been subjected to any act of Sexual Harassment by the associate of the Company.

Employer means in any workplace, any person responsible for the management, supervision and control of the Workplace.

Sexual harassment" includes any unwelcome sexually determined behavior (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome sexually determined behavior (physical, verbal or non-verbal conduct) of a sexual nature.

Sexual Harassment would also mean:

- i. **Quid pro quo sexual harassment**, which means something in return or an exchange of one thing for another.
 - In the workplace, quid pro quo sexual harassment takes place if sexual favors are asked in exchange for any kind of special treatment on the job. Threatening an Associate about his/her present or future employment status if he/she does not consent to such sexual advances or a favor also amounts to sexual harassment. The act of asking' may either be verbal or implied and the sexual conduct' may be verbal or physical. But, in either case, it must be unwelcome
 - For e.g.: Direct or implied requests or offers by any associate for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

5. PREVENTION ACTION:

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating applicable policies and other relevant information to all associates, including to all new joiners.

6. REDRESSAL COMMITTEE:

The Company shall have an Internal Complaints Committee (Committee) to specifically address any complaints of sexual harassment. The Committee will be constituted by the Company and would be headed by a Presiding Officer, who shall be a woman Associate employed at a senior level at workplace from amongst the Associates. In case the senior level officer is not available, Presiding Officer shall nominate the senior level officer from other locations.

The Internal Complaints Committee shall comprise of the following members:

- Not less than two member shall amongst Associates preferably committed to the cause of women or who have had experience in social work or have a legal knowledge; and
- One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

Provided that, at least one-half of the total members so nominated shall be women

7. PROCEDURE FOR DEALING WITH COMPLAINTS:

The complaint is needed to be lodged within 3 months from the date of incident along with any documentary evidence or names of witnesses if available. The committee can also extend the timeline to another 3 months if it is satisfied with the reasons which prevented the lodging of a complaint within the first 3 months. The complaint shall be in any form wither through phone or email but every oral communication should be followed up with the written communication and in any case where a complaint cannot be made in writing then the presiding officer or any member of the committee shall assist the person for making the complaint in writing.

In case if an aggrieved person is unable to lodge the complaint then any person who is having knowledge of the incident or any family member/ relative/ friend or co-worker can lodge the complaint on behalf of his/her. It is the responsibility of the person who receives the complaint should inform the committee members.

ICC can try and make parties to settle but monetary compensation is not the basis for settlement. If the aggrieved person is not ready to settle then ICC will inquire into the complaint and both the parties will get a chance to be heard and complete the inquiry within 90 days. After the inquiry, if the person who

committed such act is found guilty then Corrective action is taken by the appropriate authority.

Corrective action includes

Formal apology

Transfer of the person to other department

Suspension or termination of services of the employee found guilty for such offence

Counseling

A written warning to the concerned employee and a copy of it are maintained in his record.

8. RELIEFS TO VICTIMS:

Monetary compensation

Grant leaves for 3 months

Transfer the victim to any other department where he/she feels safe to work

9. POLICY IMPLEMENTATION AND REVIEW:

The Company reserves the right to amend, abrogate, modify, rescind / reinstate the entire policy or any part of it at any time.
