

JYOTI RESINS AND ADHESIVES LIMITED

**POLICY ON PREVENTION OF SEXUAL HARASSMENT
OF WOMEN AT WORKPLACE**

I. OBJECTIVE:

“JYOTI RESINS AND ADHESIVES LIMITED” or (“JRAL ”). or “the Company”) is committed to provide 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 workplace, 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.

II. SCOPE

This policy applies to all categories of employees of the Company, including top management, workmen, temporaries, trainees and employees on contract basis at their workplace of every establishment of the Company including but not limited to any branch, factories, or any premises. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associate. The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION OF SEXUAL HARASSMENT

a) Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behaviour that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.

b) Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, sexual advances, comments with sexual overtones, objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.

c) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.

d) Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media.

e) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment, as defined in (a) above, may amount to sexual harassment: —

- (i) Implied or explicit promise of preferential treatment at work; or
- (ii) Implied or explicit threat of detrimental treatment at work; or

- (iii) Implied or explicit threat about present or future employment status; or
- (iv) Interference with work or creation of an intimidating or offensive work environment; or
- (v) Humiliating treatment likely to affect health, safety or self-esteem.

IV. POLICY STATEMENT

All employees of Company

- a. will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b. understand and appreciate the rights of the individual to be treated with dignity.
- c. required to maintain a work environment, which is free from any kind of harassment.
- d. will refrain from committing any acts of sexual harassment at workplace.
- e. Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f. will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Internal Complaints Committee" has been initiated in the Company for time-bound redressal of the complaint made by any victim.

VI. INTERNAL COMPLAINTS COMMITTEE:

The Company has instituted an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints as per Section 4 of the Sexual Harassment of the Women the workplace (prevention, Prohibition and Redressal) Act 2013.

Constitution of the Internal Complaints Committee:

An Internal Complaints Committee has been formed to redress any complaints of sexual harassment. The committee comprises of:

Presiding Officer: A woman employee at a senior level in the organization or workplace

- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge One external member from non-governmental organization, familiar with the issues relating
- to Sexual harassment At least one half of the total members is women
- The members of this committee are mentioned in Annexure 1 The committee is responsible for: Receiving complaints of sexual harassment at workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of the inquiry
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in prescribed format

Initially, and till further notice, the Internal Complaints Committee will comprise of the members as per Annexures A out of which at least two members will be of the same gender as that of the complainant:

VII. 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.

VIII. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

IX. ACCESS TO REPORTS AND DOCUMENTS:

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.

X. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XI. CONCLUSION:

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.