

NATURAL SUGAR AND ALLIED INDUSTRIES LIMITED
SAINAGAR, RANJANI, TAL. KALLAM, DIST. OSMANABAD – 413528

PREVENTION OF SEXUAL HARASSMENT AGAINST WOMEN POLICY

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Policy no NSAI-POSH 1.0, 1st April, 2017

NATURAL SUGAR AND ALLIED INDUSTRIES LIMITED
 SAINAGAR, RANJANI, TAH. KALLAM, DIST. OSMANABAD - 413528
PREVENTION OF SEXUAL HARASSMENT AGAINST WOMEN POLICY

1. Commitment

Our company is committed to provide work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment irrespective of cast, creed and gender. The company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. Introduction

It is the goal of Natural Sugar and Allied Industries Limited to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because Natural Sugar and Allied Industries Limited takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

3. Scope

This policy applies to all employees (Full-time, part time, trainees and those on contractual assignments) of the company including all subsidiaries and affiliated companies at their workplace or at client sites. The company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

4. Definition

4.1 Company Means:

"Natural Sugar & Allied Industries Ltd." Ranjani Tal. Kalamb Dist. Osmanabad.

4.2 Workplace Includes:

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

4.3 Sexual Harassment

"Sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

(a) Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,

(b) Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's

work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor 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.

In addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances -- whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;

- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

5. Responsibilities Regarding Sexual Harassment

All employees of the company have a personal responsibility to ensure that their behavior will not be contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. Constitution of Committee

An appropriate complaint mechanism in the form of "**INTERNAL COMPLAINT COMMITTEE**" has been created in the company for time-bound redressal of the complaint made by the victim.

A committee namely **Internal Complaint Committee** has been constituted by the board of directors by passing necessary resolutions & a member has been nominated on the committee. The presiding officer of the committee shall be a managerial woman employee of the company. If there is no responsible or independent managerial level woman worker, the board of directors may appoint an independent outsider woman having good character, reputation and familiar with the issues relating to sexual harassment of women or a man employee nominated as a presiding officer from other offices or administrative units in case of non-availability of senior women.

The Company shall constitute an Internal Complaints Committee (hereinafter referred to as "the Committee") for redressal of sexual harassment complaints (made by the victim) and for ensuring time-bound treatment of such complaints.

Initially, and till further notice, the Committee will comprise of the following four members:

1. **Presiding Officer:** Woman employee at the level of Manager or above or outside woman working for the women and having good character and reputation. In case of women employee not available, a man employee from other unit will nominate.
2. **Woman Employee (Member)**
3. **Divisional / Plant Head / Branch Manager** or any other Senior man employee of the Division/ location **(Member)**
4. **Member from an NGO.**

The Committee shall be responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated

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allegations of sexual harassment

- Discouraging and preventing employment-related sexual harassment

7. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

The Company shall take care and is committed for providing a supportive environment to resolve concerns of sexual harassment as under:

7.1 Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim feel uncomfortable even after instructing to the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

7.2 Complaints

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Committee constituted by the Company. The complaint shall have to be in writing and can be in form of a letter, submitted within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. The Committee may extend the timeline for filing the complaint, for reasons to be recorded in writing, by a period of 3 months. The Complainant shall require to disclose their name, department, division and location they are working in, to enable the Presiding Officer or members of the Committee to contact them and take the matter forward.

Complaint against any member of the Internal Complaints Committee or employee in Strategic Job Responsibility Band (or equivalent) and above should be sent directly to the CMD of the Company.

2. The Presiding Officer of the Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 15 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding

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Officer will record this finding with reasons, and communicate the same to the complainant and the Board of Directors of the Company.

3. If the Presiding Officer of the Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations on action to be taken to the "Chairman and Managing Director" of company as soon as practically possible and in any case, not later than 60 days from the date of receipt of the complaint. Company Secretary, Labour Welfare Officer and the Chairman and Managing director of the Company will jointly take decision on the corrective action based on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- i. Formal apology
- ii. Counseling
- iii. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- iv. Change of work assignment / transfer for either the perpetrator or the victim.
- v. Suspension or termination of services of the employee found guilty of the offence.

6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

8. Sexual Harassment Investigation

When complaint will receive from the complainant, the Committee will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. The investigation will include a private interview with the person filing the complaint and with witnesses. The presiding officer or member of the committee will also interview the person alleged to have committed sexual harassment. After the completion of investigation, the committee will prepare the report thereon and submit the same to management/board of Directors of the Company and make the necessary/appropriate recommendation accordingly. The copy to the said report may be supplied to Complainant and the alleged person on demand. On the finding and recommendations of the Committee, the management of the Company will take appropriate action.

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9. Confidentiality

The Company knows that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest 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 investigation process to the extent practicable and appropriate under the circumstances.

10. Powers of Internal Complaint Committee

10.1 The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the committee to conduct such enquiries to ensure equal representation of the gender as that of the complainant or for any other valid reason.

10.2 If the aggrieved women desire to tender any documents by way of evidence, the committee can supply true copies of such documents in evidence.

11. Protection of 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.

12. Disciplinary Action

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

13. 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.

Place: RANJANI.
Date: 22/06/2020

Signature _____

B. B. Thombare

Chairman and Managing Director

DIN: 00022391

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