

ANTI - SEXUAL HARASSMENT POLICY

POLICY

Gokul Agro Resources Limited (GARL) is an equal employment opportunity Company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment. Accordingly the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 has become effective and requires the compliance.

SCOPE AND EFFECTIVE DATE

1. This Policy extends to all employees of the Company at all level and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

2. Sexual harassment would mean and include any of the following:

i) unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;

ii) unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;

iii) eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

iv) act or conduct by a person in authority which creates the environmental workplace hostile or intimidating to a person belonging to the other sex;

v) conduct of such an act at work place or outside in relation to an Employee of GARL, or vice versa during the course of employment; and

vi) any unwelcome gesture by an employee having sexual overtones.

3. "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

COMPLAINT REDRESSAL COMMITTEE

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

CONSTITUTION

Presiding Officer: One: a woman employed at a senior level at workplace from amongst employees (in case a senior level women employee is not available, the Presiding officer shall be nominated from the other offices or administrative units of the workplace. In case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding officer shall be nominated from any other workplace of the same employer or other dept or organization)

Members: not less than two: from employees preferably committed to the cause of women or who have experience in social work or have a legal knowledge.

Member: One: from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

At least one half of the total members shall be women.

Committee:

AT H.O. - Ahmedabad:

1. Ms. Dhara Chhapiya - Presiding Officer
2. Ms. Swati Nigam - Member
3. Mr. Jayesh Thakkar - Member
4. Ms. Vinita Thakkar - Member
5. Mr. Chirag Shah - Member

AT PLANT - Gandhidham:

1. Ms. Moushumi Ghosh - Presiding Officer
2. Mrs. Vishakha Parshette - Member
3. Mr. Gurdeep Saini - Member
4. Ms. Himanshi Thakkar - Member
5. Mr. Murari Sharma - Member

2. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

REDRESSAL PROCESS

1. Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.

2. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
3. The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
4. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
5. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/ her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
6. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
7. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

ENQUIRY PROCESS

1. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
2. The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
3. The Complainant shall be provided with a copy of the written explanations submitted by the person against whom complaint is made.
4. If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
5. If the Complainant or the person against whom complaint is made desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents, wherever possible. Both shall affix his / her signature on the respective documents to certify these to be original copies.
6. The Committee shall call upon all witnesses mentioned by both the parties.
7. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
8. The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the HR Head / Compliance Officer.

The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straight away.

9. The Committee may recommend to the HR Head action which may include transfer or any of the other appropriate disciplinary action.

10. The Committee shall be governed by such rules or provisions as may be framed by the Act from time to time.

OTHER POINTS TO BE CONSIDERED

1. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

2. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, GARL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

3. The Committee shall analyze and put up report on all complaints of this nature at the end of the year for submission to HR Head / Compliance Officer.

4. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for lodging a Police Complaint.
