

JAYSHREE CHEMICALS LIMITED

Company's Policy on Sexual Harassment of Women at the work place

1. Title and Commencement :

This Policy will be called Jayshree Chemicals Policy on Sexual Harassment of Women at the work place on zero tolerance to sexual harassment at the work place and shall come into force with immediate effect.

2. SCOPE:

This Policy shall apply to all women employed at the workplace for any work of regular, temporary, ad hoc or daily wage basis, directly or through an agent /contractor, including persons working on a voluntary basis and also apprentices, trainees, probationers, agent, including consultants of the Company.

3. OBJECTIVE:

The Company firmly believes that every employee has a right to work in an environment free from harassment, intimidation or offensive behaviour and issues of harassment will be resolved without fear of reprisal. The Policy is designed to take effective measure to prevent and prohibit sexual harassment of women and have the mechanism to redress cases of sexual harassment and impose punishment for those responsible for sexual harassment.

4. POLICY:

Harassment in any form will not be permitted or tolerated or condoned by the Company whether it is based on a person's race, colour, ethnic or national origin, gender, real or suspected sexual orientation., religion or perceived religious affiliation, disability or other personal characteristics.

The use of Company property including e-mail, Bulletin Boards or any document as a vehicle for harassment is prohibited.

5. PROHIBITION OF SEXUAL HARASSMENT:

No employee shall engage in Sexual Harassment.

6. MEANING OF SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR:

'Sexual Harassment', includes any unwelcome sexually determined behaviour, direct or by implication and includes physical contact and advances, a demand or request for sexual favours, sexually coloured remarks, showing pornography, any

other unwelcome physical, verbal or non verbal conduct of a sexual nature. Sexually Oriented behaviour shall mean and include but not limited to the following:

Material that is sexual in nature, sexist, sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer, i-pad, mobile phone, i-phone, blackberry or on any other machine or on the internet or any other public display system or public place in the work premises.

Verbal abuse or comments that put down people because of their sex.

Comments about bodies.

Tales of sexual exploits

Graphic descriptions pornography

Pressure for dates

Sexually explicit gestures

Unwelcome touching and hugging

Sexist and insulting remarks

Sexist jokes and cartoons

Displaying pornography in the workplace

Insisting that workers wear revealing clothing

Inappropriate gifts

Discussion of one's partner's sexual life

Lewd and threatening letters

"Accidentally" brushing sexual parts of the body

Pressing or rubbing up against an aggrieved person

Indecent exposure

Subtle or overt pressure for sexual favours

Soliciting sexual services

Demanding sexual services

Sexual or physical contact, such as kissing or touching

Intrusive questions about sexual activity

Sexual assault

Repeated sexual invitations when the person invited has refused/ ignored similar invitations

Coerced sexual intercourse (e.g., as a condition of employment or academic status)

"Sexual Harassment" should not be confused with simple friendly behaviour, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is an unwelcome act.

7. PREVENTION OF SEXUAL HARASSMENT

No women shall be subjected to sexual harassment at any work place.

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 may amount to sexual harassment.

- (i) implied or explicit promise of preferential treatment in the persons employment/promotion; or
- (ii) implied or explicit threat of detrimental treatment in the persons employment/promotion; or
- (iii) implied or explicit threat about the persons present or future employment/promotion status; or
- (iv) interferes with work or creating an intimidating or offensive or hostile work environment for the persons; or
- (v) humiliating treatment likely to affect the persons health or safety.

8. RIGHTS AND RESPONSIBILITIES OF EMPLOYEES

- (1) Every Employee shall be entitled to a work environment with dignity and free from sexual harassment.

- (2) Every Employee shall be entitled to complain against Sexually Oriented Behaviour to which she was subject to or which was targeted at her, to the Internal Complaints Committee or to the Chairperson or any other Member of the Internal Complaints Committee established under this policy, as the case may be.
- (3) Every Employee shall promptly report any incident of Sexual Harassment that comes to his/ her knowledge to the Internal Complaints Committee or to the Chairperson of the Internal Complaints Committee or to the Official, if designated by the Chairperson of the Internal Complaints Committee as the case may be.

9. THE INTERNAL COMPLAINTS COMMITTEE

The names and contact details of the members of the Internal Complaints Committee is given in Annexure One. The term of office of the Internal Complaints Committee is for a period of 3 years from today. On the expiry of the three year period, the existing members of the Internal Complaints Committee will continue to hold office, till the new Internal Complaints Committee is constituted. If a member of the Internal Complaints Committee who is an employee of the company and when she /he cease to be an employee of the company then she/he will also cease to be a member of the Internal Complaints Committee.

The Internal Complaints Committee will cover all the factories and offices of the Company in India.

10. POWERS AND DUTIES OF THE INTERNAL COMPLAINTS COMMITTEE

The Internal Complaints Committee will receive the complaints on sexual harassment; enquire into the complaints, conduct the enquiry and submit the findings on the complaint

11. COMPLAINTS PROCEDURE

Any employee will have a right to lodge a complaint concerning sexual harassment against an employee.

Such a complaint needs to be in writing.

If the complaint is oral, the same needs to be in writing. The complainant, if desires could be facilitated in writing the complaint by an Internal Complaints Committee member.

The Complainant will be afforded confidentiality on the complaint by the Internal Complaints Committee members.

Immediately upon receipt of the Complaint, the Member of the Internal Complaints Committee to whom the Complaint is made shall communicate the same to the Chairperson of the Internal Complaints Committee

Within a period of 5 working days from the date of such communication, the Chairperson shall convene a meeting of the Internal Complaints Committee.

The Internal Complaints Committee shall examine the complaint and shall undertake investigation of the complaint after giving opportunities to the complainant to present her case and the respondent to give his /her version. The Internal Complaints Committee may examine witness from both the sides and also give opportunity of cross-examining of the witness. Documents if any produced by the parties may be taken on record. Neither the complainant nor the respondent is allowed to bring in any legal practitioner to represent them in their case at any stage before the Internal Complaints Committee. The Internal Complaints Committee on completion of the inquiry will submit its report to the complainant, respondent and the company management. The Internal Complaints Committee shall enquire into the complaint as prescribed under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made there under as in force from 9.12.2013.

12. PROTECTION AGAINST VICTIMISATION:

In the event complainant being an employee and the respondent being his/her manager, during the pendency of investigation and even after such investigation if the manager is found to be guilty, the respondent shall not act as Manager of the Complainant.

13. CONSEQUENCE OF COMPLAINT BEING PROVED:

In the event allegations made in the complaint are proved against the respondent, it will be taken as proved misconduct and the competent authority may impose any of the punishment as envisaged in the policy on disciplinary process including dismissal.

14. CONSEQUENCE OF FALSE COMPLAINT:

In the event allegations made by the complainant are proved to be false then the competent authority may impose any of the punishment as envisaged in the policy on disciplinary process including dismissal.

15. OBLIGATIONS OF THE MANAGEMENT:

The Management of the Company shall provide all necessary assistance for the purpose of ensuring full effective and speedy implementation of this Internal Complaints Committee constituted as above and shall implement the decisions in an expeditious manner.

16. THIRD PARTY HARASSMENT:

In case of third party Sexual Harassment the Internal Complaints Committee will actively assist and provide all its resources to the complainant in pursuing the complaint.

17. SAVINGS:

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the respondent under any other provision of civil or criminal law.

Signature :

Name : Prabhu Nath Ojha

Designation : Executive Director

Dated : 14th May, 2014

Place : Kolkata

JAYSHREE CHEMICALS LIMITED

Annexure 1

Name and details of the Internal Complaints Committee Members

| Sr. No. | Names | Designation | Whether Company Employee | Contact Address & Email | Telephone No. & Mobile No. |
|---------|---------------------|--------------|--------------------------|--|----------------------------|
| 1 | Ms.Moumita Sarkar | Chair Person | Yes | 38-B, Braun Feld Row Kolkata-700027 corporatehr@jayshreechemicals.com | 9007929294 22656272 |
| 2 | Ms.Arpita Roy | Member | Yes | 7, North Nowdapara Kolkata-700057 aroy@jayshreechemicals.com | 9674186821 22656271 |
| 3 | Mr.Nav Ratan Biyani | Member | No | External Person E 17/14, Purbasa Housing Estate 160, Maniktalla Main Road Kolkata-700054 nrbiyani@gmail.com | 9748603972 22654922 |

Signature :
Name : Prabhu Nath Ojha
Designation : Executive Director
Dated : 14th May, 2014
Place : Kolkata