



THE SUKHJIT STARCH & CHEMICALS LIMITED

SEXUAL HARASSMENT POLICY

Introduction

The company is committed to provide a safe and conducive work environment to its employees and expects them to combine “Expertise with responsibility”. Towards this it is essential that each employee deals with his/her colleagues and third parties with full fairness and respect and realize that his/her behavior will be attributed to the company and can affect its inward and outward reputation.

Under the corporate compliance, harassment of any kind including sexual harassment is forbidden. Company recognizes the right of every employee to be able to attend work and to perform their duties without being subjected to any form of sexual harassment. It is the obligation and responsibility of every employee to ensure that the workplace is free from sexual harassment. Company is fully committed to its obligation to eliminate sexual harassment at the workplace.

Purpose & Objective

The company Sexual Harassment Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment and to comply with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder.

The objective in implementing and enforcing this policy is to define workplace sexual harassment, prohibit it in all forms, carry out appropriate disciplinary measures in the case of violations, and provide procedures for lodging complaints about conduct that violates this policy and investigating sexual harassment claims with appropriate remedial action to ward of any such act or violation at the workplace.

Applicability

This policy applies to all the employees, workers and trainees of the company. Where sexual harassment occurs to an employee as a result of an act by a third party or outsider while on official duty, the company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

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What is Sexual Harassment?

Sexual Harassment includes such unwelcome sexually determined behavior, as physical contacts and advances, sexually colored remarks, showing pornography and sexual demands whether by words, gestures or actions, staring or leering, insults or taunts of a sexual nature, sending sexually explicit emails or text messages, behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications and any other unwelcome physical, verbal or non-verbal conduct of sexual nature. Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that his or her objection would disadvantage him/her in connection with employment, including promotion or when it creates a unhealthy, unproductive & hostile working environment.

Policy

The Company will not tolerate sexual harassment under any circumstances. Responsibility lies with every Manager, Supervisor and employee to ensure that sexual harassment does not occur at the workplace.

Both central and state Equal Employment Opportunity legislation provide that sexual harassment is unlawful and establish minimum standards of behavior for all employees.

This policy applies to conduct that takes place in any work-related context, including conferences, work functions, social events and business trips.

A breach of this policy will result in disciplinary action, up to and including termination of employment. The Company strongly encourages any employee who feels that they have been sexually harassed to take immediate action. If an employee feels comfortable in doing so, it is preferable to raise the issue with the person directly with a view to resolving the issue by discussion. The employee should identify the harassing behavior, explain that the behavior is unwelcome and offensive and seek that the behavior stops.

Alternatively, or in addition, they may report the behavior in accordance with the relevant procedure. Once a report is made the organization has the right to determine how the report should be dealt with in accordance with its obligations and this policy.

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Any reports of sexual harassment will be treated seriously and promptly with sensitivity. Such reports will be treated as completely confidential up to the point where a formal or informal complaint is lodged against a particular person, at which point that person must be notified under the rules of natural justice. Complainants have the right to determine how to have a complaint treated, to have support or representation throughout the process, and the option to discontinue a complaint at any stage of the resolution process.

The alleged harasser also has the right to have support or representation during any investigation, as well as the right to respond fully to any formal allegations made. There will be no presumptions of guilt and no determination made until a full investigation has been completed.

No employee will be treated unfairly as a result of rejecting unwanted advances. Disciplinary action may be taken against anyone who victimises or retaliates against a person who has complained of sexual harassment, or against any employee who has been alleged to be a harasser. All employees have the right to seek the assistance of the relevant tribunal or legislative body to assist them in the resolution of any concerns.

Managers or Supervisors who fail to take appropriate corrective action when aware of harassment of a person will be subject to disciplinary action.

Internal Complaint Committee (ICC)

The company has formed an Internal Complaint Committee as per the provisions of the The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, commonly referred to as the 'PoSH Act' to receive the complaints, handle/deal with the complaints, conduct inquiry, call upon any explanation, examine the witnesses, initiate corrective actions, resolve the disputes, lodge complaints (if any required), recommend any action to the management and/or to do any other act/thing/ deed as may be deemed appropriate or necessary for resolving the complaint(s) or incidental thereto, in consonance with the provisions of the Act and in consultation with the management of the company to the satisfaction of the complainant / harasser.

Complaint Resolution Procedures

Individuals should report complaints of conduct believed to violate Company's sexual harassment policy according to the policy's complaint procedures. To initiate a formal investigation into an alleged violation of this policy, employees may be asked to provide a written statement about the alleged

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misconduct to the ICC/ HR head. Complaints should be submitted as soon as possible after an incident has occurred. The ICC/ HR head may assist the complainant in completing the statement. To ensure the prompt and thorough investigation of a sexual harassment complaint, the complainant should provide as much of the following information as is possible:

1. The name, department and position of the person or persons allegedly causing the harassment.
2. A description of the incident(s), including the date(s), location(s) and the presence of any witnesses.
3. The effect of the incident(s) on the complainant's ability to perform his or her job, or on other terms or conditions of his or her employment.
4. The names of other individuals who might have been subject to the same or similar harassment earlier.
5. What, if any, steps the complainant has taken to try to stop the harassment.
6. Any other information the complainant believes to be relevant to the harassment complaint.

Disciplinary Action

Employees who violate this policy are subject to appropriate disciplinary action. If an investigation results in a finding that this policy has been violated, the mandatory minimum disciplinary action is a written reprimand. The disciplinary action for very serious or repeat violations is termination of employment. Persons who violate this policy may also be subject to civil damages or criminal action.

Confidentiality

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept as confidential as possible. However, the identity of the complainant is usually revealed to the respondent and witnesses. The ICC / HR head takes adequate steps to ensure that the complainant is protected from retaliation during the period of the investigation. All information pertaining to a sexual harassment complaint or investigation is maintained by the ICC/ HR head in secure files. The ICC/ HR head can answer any questions relating to the procedures for handling information related to sexual harassment complaints and investigations to complainants and respondents.

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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 retaliated or discriminated against in any way or in any manner whatsoever.

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

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.
