



I G PETROCHEMICALS LIMITED
POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES

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1.0 POLICY

- 1.1 I G Petrochemicals Limited (IGPL) 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.
- 1.2 The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

2.0 SCOPE AND EFFECTIVE DATE

- 2.1 This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- 2.2 “Sexual harassment” would mean and includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
- i) physical contact or advances
 - ii) a demand or request for sexual favours or
 - iii) making sexually coloured remarks or
 - iv) showing pornography or
 - v) any other welcome physical, verbal or non-verbal conduct of sexual nature.
- 2.3 “Employee” means any person employed at a workplace for any work on regular, temporary, adhoc or daily wage basis, either directly or through an agent, including a contractor, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- 2.4 “Company” means I G Petrochemicals Limited

3. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

The Internal Complaints Committees (ICC) shall consist of the following members:

- (a) Smt. Nandini Salian, Presiding Officer
- (b) Shri Atul Wadatkar
- (c) Smt. Megha V
- (d) Smt. Shruti Bardia

4. COMPLAINT AND REDRESSAL PROCESS

- 4.1 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint either by e-mail at posh@igpetro.com or in writing of the alleged incident to the ICC with his/her signature within 10 days of occurrence of incident.
- 4.2 The ICC may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.
- 4.3 The ICC shall 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. The ICC shall hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- 4.4 At the first meeting, the ICC 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 her/his 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.
- 4.5 Thereafter, the person against whom complaint is made may be called for a deposition before the ICC and an opportunity will be given to him / her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- 4.6 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.
- 4.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the ICC.

5. CONCILIATION

- 5.1 The ICC may before initiating an inquiry at the request of the aggrieved employee take steps to settle the matter between the complainant and the respondent through conciliation.

Provided that no monetary settlement shall be made as a basis of conciliation.

- 5.2 Where a settlement has been arrived at, the ICC shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation. Provided that where the aggrieved employee informs the ICC that any term or condition of the settlement arrived at has not been complied with by the respondent, the ICC shall proceed to make an inquiry into the complaint.

5.3 The ICC shall provide the copies of the settlement to the aggrieved employee and the respondent.

5.4 Where a settlement is arrived at, no further inquiry shall be conducted by the ICC .

6. ENQUIRY PROCESS

6.1 The ICC shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

6.2 Where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC .

6.3 The ICC 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.

6.4 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

6.5 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 ICC the names of witness/es whom they propose to call.

6.6 If the Complainant desires to tender any documents by way of evidence before the ICC she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the ICC he/she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.

6.7 The ICC shall call upon all witnesses mentioned by both the parties.

6.8 The ICC 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.

6.9 The ICC shall complete the “Enquiry” within reasonable period but not beyond ninety day and communicate its findings and its recommendations for action to the ICC . The report shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

6.10 The ICC shall be vested with the powers of a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:—

(a) summoning and enforcing the attendance of any person and examining him on oath;

(b) requiring the discovery and production of documents; and

(c) any other matter which may be prescribed.

7. ACTION DURING PENDENCY OF ENQUIRY

7.1 During the pendency of an inquiry on a written request made by the aggrieved employee, the ICC may recommend to the Company to –

- (a) transfer the aggrieved employee or the respondent to any other workplace; or
- (b) grant leave to the aggrieved employee for such period as it may determine; or
- (c) grant such other relief to the aggrieved employee as may be prescribed.

7.2 The leave granted to the aggrieved employee under this section shall be in addition to the leave, the aggrieved employee would be otherwise entitled.

7.3 On the recommendation of the ICC, the Company shall implement the recommendations and send the report of such implementation to the ICC.

8. ENQUIRY REPORT

8.1 On the completion of an inquiry, the ICC shall provide a report of its findings to the Company within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

8.2 Where the ICC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.

8.3 Where the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company -

- (i) to take action for sexual harassment as a misconduct in such manner as it may decide;
- (ii) to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved employee or to his/her legal heirs, as it may determine

Provided that in case the Company is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved employee:

Provided further that in case the respondent fails to pay the sum referred above, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

8.4 The Company shall act upon the recommendation within sixty days of its receipt by him.

9. Punishment for false or malicious complaint and false evidence

Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved employee or any other person making the complaint has made the complaint knowing it to be false or the aggrieved employee or any other person making the complaint has produced any forged or misleading document, it may recommend to the Company to take action against the employee or the person who has made the complaint in accordance with the provisions of the service rules applicable to her or him.

Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant under this section.

10. Determination of compensation

For the purpose of determining the sums to be paid to the aggrieved employee as compensation, the ICC shall have regard to –

- (a) the mental trauma, pain, suffering and emotional distress caused to the aggrieved employee;
- (b) the loss in the career opportunity due to the incident of sexual harassment;
- (c) medical expenses incurred by the victim for physical or psychiatric treatment;
- (d) the income and financial status of the respondent;
- (e) feasibility of such payment in lump sum or in instalments.

11. Prohibition of publication or making known contents of complaint and inquiry proceedings

The contents of the complaint, the identity and addresses of the aggrieved employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken by the Company shall not be published, communicated or made publicly known.

The above policy was adopted by the Board of Directors at their meeting held on 10th February, 2015 and subsequently modified on 7th February, 2019, 3rd February, 2020, 24th May, 2021, 3rd February, 2022 and 10th November, 2022