



Chemistry of Success at Work

POLICY FOR PREVENTING SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

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INTRODUCTION:

Sexual harassment at the workplace is a serious violation of human rights and an impediment to creating a professional and inclusive work environment. Meghmani Organics Limited (MOL) is committed to ensuring a workplace free from discrimination, intimidation, and harassment for all individuals, regardless of their gender identity. In alignment with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 (POSH Act, India)**, which primarily addresses women's safety, MOL extends this policy to cover all employees, including men and individuals of the third gender. This policy also integrates ILO guidelines, United Nations Global Compact (UNGC) Principles, and other global best practices to ensure gender neutrality and an inclusive approach to workplace safety. By implementing a robust mechanism for prevention, reporting, and redressal, MOL aims to foster a culture of mutual respect, equality, and dignity for all employees.

1. OBJECTIVE OF POLICY:

Objective of this policy is to create a work environment where safety and dignity of employees is ensured and they are protected from Sexual Harassment as envisaged by Supreme Court of India Guidelines on Sexual Harassment, August 1997, "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013", ILO guidelines on workplace harassment, United Nations Global Compact (UNGC) Principles, and other global best practices.

The objectives of this policy are to:

- **Uphold Rights:** Recognize that sexual harassment in the workplace is a violation of women's rights to equality, life, and liberty, thereby preventing an insecure and hostile environment that undermines social and economic empowerment.
- **Legal Compliance:** Comply with the directives from the Hon'ble Supreme Court of India, mandating a robust policy for the prevention of sexual harassment.
- **Mechanism for Redressal:** Establish a permanent mechanism for the prevention and redressal of sexual harassment and other acts of gender-based violence at the workplace.
- **Structured Response:** Constitute an Internal Complaints Committee (ICC) and establish clear guidelines for addressing complaints of sexual harassment.
- **Employee Training & Awareness:** Enhance ongoing education and training so that all employees are well-informed about acceptable behaviour and the processes in place for addressing sexual harassment.
- **Cultural Transformation:** Foster a culture of inclusivity and respect, embedding zero tolerance for harassment into the organizational ethos.
- **Continuous Monitoring & Evaluation:** Implement regular reviews and updates of the policy to reflect evolving best practices and stakeholder feedback.
- **Transparency & Accountability:** Ensure transparent processes and accountability at all organizational levels, thereby reinforcing trust in the redressal mechanism

2. **SCOPE :**

This policy applies to all employees (permanent, contractual, trainees, interns), third-party vendors, consultants, and visitors at all MOL workplaces, including offices, manufacturing sites, and any place where official business is conducted.

3. **DEFINITIONS AND CONDITIONS:**

Following definitions—derived from the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013—shall apply:

- **Aggrieved Woman:** Any woman who alleges that she has been subjected to any act of sexual harassment at the workplace and seeks redressal under this policy.
- **Respondent:** Any person, whether an employee or otherwise, against whom a complaint of sexual harassment has been lodged.
- **Workplace:** Any premises, location, or platform (including virtual environments) where employees perform their duties or where business-related interactions occur, regardless of ownership or leasing arrangements.

For the purposes of this policy, **sexual harassment** includes one or more of the following acts or behaviors, whether directly or by implication:

- a) Physical contact and advances; or
- b) A demand or request for sexual favors; or
- c) Making sexually colored remarks; or
- d) Showing pornography; or
- e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- f) Hostile work environment created due to gender-based discrimination
- g) Threats or adverse employment actions in retaliation to reporting harassment
- h) Offensive jokes, gestures, or innuendos that affect dignity and workplace safety

4. **PROCEDURE**

The objective of this procedure is to establish a structured approach for the prevention, reporting, and redressal of sexual harassment at the workplace. Meghmani Organics Limited (MOL) aims to create a safe, dignified, and inclusive work environment for all employees, irrespective of their gender identity. This procedure ensures compliance with legal frameworks, including the **POSH Act (India)**, and integrates global best practices to maintain a workplace free from harassment, discrimination, and intimidation.

The procedure of prevention of sexual harassment at workplace has multiple steps as; formation of internal compliance committee, filling complaint, **Pre-Inquiry Conciliation, Inquiry Process, Handling Malicious or False Complaints, resolutions of actions,**

a) **Constitution of Internal Complaints Committee (ICC)**

A Complaints Committee, consisting of five members, has been constituted as the Internal Complaints Committee (ICC) for the redressal of such issues. The Committee should preferably include:

- A senior-level woman employee serving as the Presiding Officer.

- One Human Resources representative.
- One female representative.
- One legal representative.
- One member with an NGO background.

At least half of the Committee's members shall be women

b) Filing a Complaint:

Any aggrieved woman may submit a written complaint via email to the designated address (ethicmanager@meghmani.com) to the ICC. The complaint must be filed within three months from the date of the incident, or, in the case of multiple incidents, within three months from the date of the last occurrence.

c) Pre-Inquiry Conciliation:

Before initiating an inquiry, and upon the request of the aggrieved woman, the ICC will take steps to facilitate a settlement between her and the respondent through conciliation. (Note: No monetary settlement shall be considered as a basis for conciliation.)

- If a settlement is reached, the ICC shall record it and forward a copy to the employer for further action in line with the recommendations.
- Both the aggrieved woman and the respondent shall receive a copy of the recorded settlement.
- Once a settlement is confirmed, no further inquiry will be conducted by the ICC.

d) Inquiry Process:

- **If the respondent is an employee:** The ICC shall proceed with an inquiry into the complaint in accordance with the applicable service rules.
- **For parties who are both employees:** During the inquiry, both parties will be given an opportunity to be heard, and a copy of the findings will be provided to each party, allowing them to submit representations before the Committee.
- **Legal Provisions:**
Notwithstanding any provisions under Section 509 of the Indian Penal Code (1860), if the respondent is convicted, the court may order an appropriate compensation to the aggrieved woman in line with Section 15 on compensation determination.

For the purpose of the inquiry, the ICC shall have powers equivalent to those vested in a civil court under the Code of Civil Procedure, 1908, including:

- Summoning and enforcing the attendance of any person and examining them on oath.
- Requiring the discovery and production of documents.
- Addressing any other matter as prescribed.

The inquiry must be completed within ninety days. During the inquiry, upon receiving a written request from the aggrieved woman, the ICC may recommend certain actions to the employer. The employer shall implement these recommendations and report on their implementation to the ICC. Upon completion of the inquiry, the ICC shall provide a report of its findings to the employer within ten days. This report shall be made available to the concerned parties.

- **If the allegation is not proven:** The ICC shall recommend to the employer that no further action is required.
- **If the allegation is proven:** The ICC shall recommend appropriate actions to the employer in accordance with the Act.

e) Handling Malicious or False Complaints:

- If the ICC concludes that the complaint is malicious, or that the aggrieved woman (or any person filing the complaint) knowingly submitted false information or forged documents, it may recommend that the employer take action against the complainant in accordance with applicable service rules.
- If any witness provides false evidence or submits misleading documentation, the ICC may recommend that the employer take appropriate action against that witness as per the service rules.

Any person aggrieved by the ICC's recommendations or by the non-implementation thereof may appeal to the court in accordance with the applicable service rules within ninety days of the recommendations

f) Resolutions of actions;

If the complaint is substantiated, appropriate disciplinary actions will be taken, including warning, suspension, termination, or legal action, depending on severity.

If the complaint is found to be malicious or false, disciplinary action may be taken against the complainant, following due process. Either party can appeal the decision within **90 days** to the appropriate authority.

g) Prevention and Awareness Initiative

Mandatory POSH training for all employees annually.

Code of Conduct updates to reflect anti-harassment policies.

Periodic internal audits to assess workplace culture and safety.

Whistleblower protection mechanisms to safeguard complainants

h) Confidentiality and Retaliation Protection

The identity of the complainant, accused, and witnesses shall be kept confidential.

Retaliation or victimization of complainants and witnesses is strictly prohibited.

MOL ensures a safe reporting environment through legal and organizational safeguards.

i) Monitoring and Review

The ICC will submit an annual report to the employer and relevant statutory authorities (as applicable), detailing complaints received and actions taken.

The policy will be reviewed annually and updated as necessary to align with evolving laws and best practices.

5. DUTIES RESPONSIBILITIES:

5.1. EMPLOYER RESPONSIBILITIES:

The employer is committed to ensuring a safe and inclusive work environment by undertaking the following actions:

- i. **Safety Assurance:** Ensure a safe working environment that protects employees from any unwanted interactions or contact.
- ii. **Support for ICC:** Provide necessary facilities and support to the Internal Complaints Committee for handling complaints and conducting inquiries.
- iii. **Attendance Facilitation:** Assist in securing the attendance of respondents and witnesses at ICC proceedings.
- iv. **Information Provision:** Furnish the ICC with any relevant information required to investigate the complaint.
- v. **Legal Assistance:** Provide assistance to any woman who chooses to file a complaint under the Indian Penal Code (1860) or any other applicable law.
- vi. **Legal Action:** Initiate legal proceedings under the Penal Code (1860) or other applicable laws against the perpetrator, or, if preferred by the aggrieved woman, take action against a non-employee perpetrator present at the workplace.
- vii. **Policy Enforcement:** Treat incidents of sexual harassment as misconduct under the service rules and act accordingly.
- viii. **Monitoring:** Oversee the timely submission of reports by the ICC and ensure that recommendations are implemented.

5.2. EMPLOYEE RESPONSIBILITIES

- i. Maintain a professional and respectful workplace.
- ii. Report incidents of harassment immediately through the appropriate channels.
- iii. Participate in training programs related to sexual harassment prevention.
- iv. Cooperate fully with the Internal Complaints Committee (ICC) during investigations.
- v. Respect confidentiality provisions related to complaints and investigations.
- vi. Foster a workplace culture that discourages harassment and promotes inclusivity.
- vii. Support colleagues in raising awareness and ensuring compliance with the procedure.
- viii. Promote a workplace culture that discourages any form of harassment and discrimination.

IMPORTANT NOTES:

- i. **Annual Report:** The Company shall include in its Annual Report details regarding the number of complaints filed, resolved, and pending during the fiscal year.
- ii. A copy of this policy will be available at the HR Department of the plant and the Corporate Office.
- iii. In the event that any member of the ICC is accused of misconduct, the Committee shall be reconstituted immediately.
- iv. Both the Management and the ICC acknowledge the importance of confidentiality and shall take all reasonable measures to protect the privacy of the complainant and the respondent.

- v. Management reserves the right to modify or withdraw this policy at its discretion, provided such changes remain in alignment with the directives of the Hon'ble Supreme Court of India and other applicable laws.
- vi. Compliance with Global Standards; This policy aligns with: ILO Convention No. 190 on Violence and Harassment at Work, United Nations Global Compact (UNGC) Principle 6 on anti-discrimination, Sustainable Development Goals (SDG 5 & 8) on gender equality and decent work, ISO 45003:2021 guidelines on psychological health and safety at work

Note: The above Policy was adopted by BOD in their meeting held on 20 May, 2021 and further modified on 10 May, 2025.
