

GARDEN SILK MILLS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I: POLICY

Garden Silk Mills Limited (GSML) 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 Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

II: SCOPE AND EFFECTIVE DATE

This policy applies to all categories of employees and is deemed to be incorporated in the service conditions of all employees of the Company, including permanent management, staff and workmen, temporaries, trainees and employees on contract at their workplaces. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The policy comes into effect immediately.

The workplace includes:

1. All offices or plants or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.

III: DEFINITION OF SEXUAL HARASSMENT:

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-

- i. Physical contact and advances; or
- ii. A demand or request for sexual favors; or
- iii. Making sexually coloured remarks; or
- iv. Showing pornography; or
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

IV: RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V: COMPLAINT MECHANISM:

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of **“Internal Complaints Committee”** has been created in the Company for time-bound redressal of the complaint made by the victim.

VI: INTERNAL COMPLAINTS COMMITTEE (ICC):

The Company has instituted an Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

In accordance with the sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, initially and till further notice, the Internal Complaints Committee will comprise of the following:

1. Chairperson – Ms. Shreeshma S. Adier, y,
2. Member – Ms. Gayatri K. Patel
3. Member – Dr. Chetnaben Kapilrai Thakur representing Non-Governmental Organisations (NGO)

The Internal Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

VII: PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the ICC for redressal of their grievances. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the ICC constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged

incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the ICC to contact them and take the matter forward.

2. The ICC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the ICC will record this finding with reasons and communicate the same to the complainant.
3. If the ICC determines that the allegations constitute an act of sexual harassment, it will proceed to investigate the allegation.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director / Local Authority as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director will ensure corrective action on the recommendations of the ICC and keep the complainant informed of the same. Corrective action may include any of the following: a. Formal apology b. Counselling c. Written warning to the perpetrator and a copy of it maintained in the employee's file d. Change of work assignment / transfer for either the perpetrator or the victim.e. Suspension or termination of services of the employee found guilty of the offence.

VIII: MANNER OF TAKING ACTION AGAINST THE RESPONDENT:

Where the Complaints Committee arrives at the conclusion that the allegation against the respondents been proved, it shall recommend to the employer to take action which may include the following:

- a) Written apology;
- b) Warning;
- c) Reprimand or Censure;
- d) Withholding of Promotion;
- e) Withholding of pay rise or increments; or
- f) Terminating the respondent from service; or
- g) Undergoing a counseling session or carrying out community service.

IX: PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE:

Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the

complaint has produced any forged or misleading document, it may recommend to the employer to take action in accordance with the provisions of the service rules applicable to her or him.

X: CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

XI: ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XII: 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 victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

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

XIII: CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.