

BEST AGROLIFE LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF WOMEN EMPLOYEES AT WORKPLACE

1. OBJECTIVE

This policy has been laid down by the Company, viz. Best Agrolife Limited. (BAL)

- To lay down measures for prohibition, prevention & protection of women employees against sexual harassment at workplace
- To provide a platform for redressal of complaints of sexual harassment (if any) and the matters connected therewith and incidental thereto
- To ensure adequate relief and take appropriate action in any such matter where a complaint has been received.

By constitution of Internal Complaints Committee in terms of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. POLICY

BAL is an equal employment opportunity Company and is committed to creating a healthy work 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.

3. SCOPE AND EFFECTIVE DATE

3.1 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 on its approval, i.e. 11th November, 2019.

3.2 Sexual harassment would mean and include any of the following: -

- (a) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any Company activity;
- (b) Unwelcome sexual advances involving verbal, non-verbal or physical conduct such as sexually coloured remarks, jokes, letters, phone calls; e-mail, messages, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sound, display of pictures, signs, verbal or non-verbal communication or by any other means of communication which offends the individuals sensibilities and affect her performance;

- (c) Eve-teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- (d) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- (e) Conduct of such an act at work place or outside in relation to an employee of BAL, or vice versa during the course of employment; and
- (f) Any unwelcome gesture by an employee having sexual overtones.

These are indicative acts only not exhaustive in nature, as such, any other incident may or shall amount to sexual harassment may also be included in such acts of misconduct based on reference drawn on case to case basis which is accepted or admitted to be an act of sexual harassment by the Internal Complaints Committee.

4. INTERNAL COMPLAINTS COMMITTEE

- 4.1 The Company hereby constitutes a Committee under the nomenclature of “**Internal Complaints Committee**” (ICC) to exercise powers and discharge duties and responsibilities as per this Policy.
- 4.2 The ICC shall be constituted for Corporate Office, Units and Regional Offices of the Company where females are employed by the local Management to consider and redress complaints of sexual harassment.
- 4.3 The constitution of the Committee at Corporate/Registered Office will be as under : -

S. No.	Committee Member	Name of the Person	Remarks
1.	Presiding Officer (One)	Ms. Himanshi Negi (Company Secretary and Compliance Officer)	Woman employed at a senior level to be nominated as Presiding Officer by Corp. Office / Plant location / Regional Office not below the rank of Key Managerial Personnel (KMP) of the Company
2.	Member (One)	Ms. Isha Luthra (Whole Time Director)	To be nominated as Member by Corp. Office / Plant location / Regional Office not below the rank of Key Managerial Personnel (KMP) of the Company

The Committee shall hold Office for a period of three years from the date of its formation and may be re-constituted from time to time as and when required. Any vacancy arising at the Committee membership shall be filled by respective persons of same cadre/ as per the above criteria from time to time by consent of all the members nominated by the management.

- 4.4 The meetings of the Committee shall be held as and when required subject to quarterly review by the Committee. Attendance at each meeting and proceedings thereof must be recorded and shall be kept in safe custody of Manager HR.
- 4.5 The Presiding Officer shall act as Chairman of the Committee and minutes of meeting shall be recorded after its each meeting and be signed by Chairman for confirmation within 30 days of the same.
- 4.6 A quorum of 2 members (in which one must be women) is required to be present for the proceedings to take place. The quorum shall include Presiding Officer and at least one member.

5. REDRESSAL PROCESS

- 5.1 Any employee who feels and is being sexually harassed directly or indirectly may submit in writing a complaint of the alleged incident to the Presiding Officer of the Committee within 7 days of occurrence of incident. If required, Member of ICC shall render all reasonable assistance to the woman for making the complaint in writing.
- 5.2 The Committee will 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.
- 5.3 The Committee will hold a meeting with the Complainant within 5 (five) days of the receipt of the complaint, but no later than a week in any case.
- 5.4 At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady employee shall assist her to record the statement.
- 5.5 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an 'Enquiry' shall be conducted and concluded.

5.6 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.

5.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

6. ENQUIRY PROCESS

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

6.2 The Committee shall prepare and handover the Statement of Allegation to the person against whom complaint is made and give him an opportunity to submit a written explanation if he so desires within 7 days of receipt of the same.

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

6.4 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 Committee the names of witness/es whom they propose to call.

6.5 If the Complainant desires to tender any documents by way of evidence before the Committee, she 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 Committee he shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.

6.6 The Committee shall call upon all witnesses mentioned by both the parties.

6.7 The Committee 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.

6.8 The Committee shall complete the 'Enquiry' within reasonable period but not beyond 2 (two) months and communicate its findings to the Chairperson. The Chairperson will review and scrutinize the reports & send her recommendations for action to the HR Manager. The report of the Committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment.

7. OTHER POINTS TO BE CONSIDERED

- 7.1 The Committee may recommend to the HR Manager action which may include minor or major punishment or any of the other appropriate disciplinary action including but not limited to expulsion or dismissal or suspension of an employee found guilty.
- 7.2 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
- 7.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, BAL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 7.4 In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for lodging a Police Complaint.

This Policy shall be governed by The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 as amended from time to time.

The Management reserves the right to amend, alter, modify any or all the provisions of this Policy from time to time.

Signed, Approved and Notified by

Sd/-
Managing Director

Sd/-
Manager-HR