

BIOFIL CHEMICALS AND PHARMACEUTICALS LIMITED

CIN:- L24233MP1985PLC002709

POLICY ON PREVENTION OF SEXUAL HARASSMENT

(Under Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act,
2013 and Regulations made there under**)**

BIOFIL CHEMICALS AND PHARMACEUTICALS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

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NOTE: Throughout this Policy, the term “Company” refers to Biofil Chemicals and Pharmaceuticals Limited in which an employee works, depending on context.

POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES AT WORKPLACE

BIOFIL CHEMICALS AND PHARMACEUTICALS LIMITED

1. PREAMBLE

BIOFIL CHEMICALS AND PHARMACEUTICALS LIMITED 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 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 Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

2. APPLICABILITY

2.1 The policy shall be applicable to all the employees employed at the workplace for any work on regular, temporary, ad hoc or daily wage basis. Either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, 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.

2.2 "Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

3. DEFINITION AND SCOPE OF SEXUAL HARASSMENT

Sexual harassment would mean and include any of the following:

- (i) Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- (ii) unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexual jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- (iii) eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- (iv) act or conduct by a person in authority which creates the hostile environment at workplace or intimidating to a person belonging to the other sex;
- (v) any unwelcome gesture by an employee having sexual overtones.

4. INTERNAL COMPLAINT REDRESSAL COMMITTEE

A Committee has been constituted by the Management to consider & redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

1. Mrs. Namrata Tiwari	Chairman
2. Ms. Chandra Nair	Member
3. Mr. Satish Gaur	Member
4. Mr. Rajpal Rajput	Member

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson and at least two members, one of whom shall be a lady. Committee shall submit its report to the management.

5. REDRESSAL PROCESS

- 51 Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 30 days of occurrence of incident.
- 52 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.
- 53 The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but not later than a week in any case.
- 54 At the first meeting, the Committee members 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 his/her 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.
- 55 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.
- 56 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.
- 57 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

- 61 The Committee shall proceed with the Enquiry within two working days from receipt of complaint and communicate the same to the Complainant and person against whom complaint is made.
- 62 The Committee 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.

- 63 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- 64 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.
- 65 If the Complainant desires to tender any documents by way of evidence before the Committee, 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 Committee 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.
- 66 The Committee shall call upon all witnesses mentioned by both the parties.
- 67 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.
- 68 The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Chairman & Managing Director. The report of the committee shall be treated as an enquiry report on the basis of which an employee who has been found guilty of such allegations can be awarded appropriate punishment straightaway.
- 69 The Chairman & Managing Director will direct appropriate action in accordance with the recommendation proposed by the Committee.
- 6.10 The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7. PROTECTION AGAINST RETALIATION

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Internal Complaints Redressal Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

8. DOCUMENTATION

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accuser's files with the full report of the Internal Complaints Redressal Committee.

9. COMPLAINTS MADE WITH A MALICIOUS INTENT

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual

harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

10. DISCIPLINARY ACTION

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

11. CONFIDENTIALITY

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.