

POLICY

ON

**THE SEXUAL
HARASSMENT OF**

WOMEN AT

WORKPLACE

(PREVENTION,

PROHIBITION AND

REDRESSAL) ACT,

2013”



RAGHUVIR SYNTHETICS LIMITED

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CIN : L17119GJ1982PLC005424

INTRODUCTION:

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed there under (hereinafter "the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

COMMITMENT :

Our Company " **RAGHUVIR SYNTHETICS LIMITED**" is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination. The 'Policy on Prevention of Sexual Harassment of women at workplace' intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

SCOPE

"This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace.

1. The workplace includes:

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

2. "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:

- i. Physical contact and advances;
- ii. Demand or request for sexual favors;
- iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually Demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;



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- v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- vi. Giving gifts or leaving objects that are sexually suggestive;
- vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- viii. Persistent watching, following, contacting of a person; and
- ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

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.

COMPLAINTS COMMITTEE

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. The Complaints Committee shall have atleast one of its members as women. Presently the Complaints Committee comprises of the following members:

Mr. Sunil R. Agarwal – Chairperson
Mrs. Pamita S. Agarwal- Member
Mr. Yash S. Agarwal - Member
Mr. Hardik S. Agarwal - Member

The Complaints Committee shall be 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

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

A. Manner of Complaint of Sexual Harassment

- (i) Any aggrieved woman may make in writing, a complaint of sexual harassment at workplace to the Complaints Committee ('Committee'). Provided that where such complaint cannot be made in writing, the Chairperson or any Member of the Committee, as the case may be, shall render all reasonable assistance to the woman for making the complaint in writing.



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- (ii) Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

B. Conciliation

(i) The Committee may, before initiating any inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation.

(ii) Where a settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same to the Board of Directors to take necessary action in this regard.

(iii) The Committee shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.

(iv) Where a settlement is arrived at, no further inquiry shall be conducted by the Committee.

Provided that where the aggrieved woman informs the Committee, as the case may be, that any term or condition of the settlement arrived at has not been complied with by the respondent, the Committee shall proceed to make an inquiry into the complaint or, as the case may be, forward the complaint to the police.

C. Inquiry into Complaint

(i) The Chairperson of the Committee 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. 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, s/he will record this finding with reasons and communicate the same to the complainant.

(ii) If the Chairperson of the Committee determines that the allegations constitute an act of sexual harassment, s/he will proceed to investigate the allegation with the assistance of the Committee members.

(iii) 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 Committee.



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(iv) 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.

(v) The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board of Directors.

D. Inquiry Report and Action

(i) On the completion of an inquiry, the Committee shall provide a report of its findings to the Board of Directors and such report be made available to the concerned parties.

(ii) Where the Committee arrives at the conclusion that the allegation against the respondent has not been proved, then no action is required to be taken in the matter.

(iii) Where the Committee and Board of Directors together arrives at the conclusion that the allegation against the respondent has been proved, it may take the following actions depending upon the circumstances :

- a. Formal apology
- b. Counseling
- c. Written warning to the Respondent and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the Respondent or the Complainant.
- e. Suspension or termination of services of the employee found guilty of the offence
- f. Granting of compensation or damages to the Complainant
- F. False or Malicious Complaint

(iv) Where the 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 or any other person making the complaint has produced any forged or misleading document, the Complainant shall, be liable for appropriate disciplinary action by the Board of Directors. Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. Provided further that the malicious intent on part of the complainant shall be established after an inquiry in accordance with the procedure prescribed, before any action is recommended.

(v) Where the Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Board of Directors to take necessary actions in this regard.



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COMPENSATION

For the purpose of determining the sums, if any to be paid to the aggrieved woman, the Committee shall consider the following while arriving at the compensation :

- i. the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
- ii. the loss in the career opportunity due to the incident of sexual harassment;
- iii. medical expenses incurred by the victim for physical or psychiatric treatment

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 the investigatory process to the extent practicable and appropriate under the circumstances.

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.

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 the 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.

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.

FOR RAGHUVIR SYNTHETICS LIMITED

FOR, RAGHUVIR SYNTHETICS LIMITED

DIRECTOR / AUTHORISED SIGNATORY

SUNIL R. AGARWAL

CHAIRMAN & MANAGING DIRECTOR

DIN: 00265303