

SANGHI INDUSTRIES LIMITED

Policy on "Prevention of Sexual Harassment" (POSH)

Sanghi Industries Limited's (SIL) POSH policy is in alignment
with the Adani Group's POSH policy

Group policy on "Prevention of Sexual Harassment"

- 1.0 **Context:** Increasingly, across the globe, there is a large focus on the Social Responsibilities of Organisations and their employees. There is a clear emphasis on preserving and enhancing the dignity of the individual. Equally, there has been a consensus that sexual harassment of women in organisations is a basic assault on the dignity of women and strong actions need to be taken to ensure that this is prevented and eradicated in all organisations. In India the Supreme Court in its Vishakha judgment laid down the guidelines to be followed in such cases, which were then incorporated into the "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" ('the Act'). Sanghi Industries Limited (SIL) concurs with the worldview on this aspect and this policy has been crafted with that in mind.
- 2.0 **Scope:** The policy follows the universal practice of explaining sexual harassment and is specifically applicable to any instance of harassment of women at the workplace, or in the case of an employee outside the workplace regardless of who was involved in the act.
- 3.0 **Objective:** The purpose of this Policy is to ensure the following actions with respect to all employees and stakeholders, especially women:
- 3.1 Treat all employees with dignity and respect at all times
 - 3.2 Not display any unwelcome behaviour that has connotations of sexual harassment
 - 3.3 Avoid creating a situation of oppression or hostility at the workplace by using sexual harassment as a tool
 - 3.4 Follow the law and rules (related to sexual harassment) and ensure that others also follow the laws and rules. Take prompt action on instances of alleged harassment at the workplace, by reporting all such instances.
- 4.0 **Primacy of the Act:** It is specifically provided that the provisions contained in the Act shall prevail wherever there is any conflict with this policy or where there is any doubt or clarification required on any aspect of the policy.
- 5.0 **Definitions:**
- 5.1 **"Sexual Harassment"** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but is not limited to:
- 5.1.1 Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
 - 5.1.1.1 Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
 - 5.1.1.2 Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and/or implicit sexual connotation/overtone, molestation.
 - 5.1.1.3 Teasing, Voyeurism, innuendos and taunts with an implicit sexual connotation, physical confinement and /or touching against one's will
 - 5.1.1.4 Demand or request for sexual favours
 - 5.1.1.5 Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body

- 5.1.1.6 Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
 - 5.1.1.7 Showing pornography, making or posting vulgar/ indecent/ sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures, etc.
 - 5.1.1.8 Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
 - 5.1.1.9 Giving gifts or leaving objects that are sexually suggestive
 - 5.1.1.10 Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; persistent watching, following, contacting of a person; and
 - 5.1.1.11 Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- 5.1.2 The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment:
- 5.1.2.1 Implied or explicit promise of preferential treatment in employment
 - 5.1.2.2 Implied or explicit threat of detrimental treatment in employment
 - 5.1.2.3 Implied or explicit threat about the present or future employment status
 - 5.1.2.4 Interference with the person's work or creating an intimidating or offensive or hostile work environment
 - 5.1.2.5 Humiliating treatment likely to affect health or safety
- 5.2 **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- 5.3 **Complainant:** Any aggrieved woman who makes a complaint alleging sexual harassment under this policy.
- 5.4 **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy.
- 5.5 **Employee (for the purposes of this act only):** A person employed at the workplace, for any work on a 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.
- 5.6 **Special Educator:** A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and need.
- 5.7 **Workplace:** Any premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company. Places visited by the Employee arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking a journey.
- 5.8 **Employer:** In relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit, the head of the department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit; in any workplace not covered under above, a person responsible for management, supervision and control of the workplace.

6.0 Policy:

- 6.1** SIL has a policy of zero tolerance to any instance of sexual harassment and shall take all necessary steps to investigate and take necessary action with respect to such incidents
- 6.2** For the purposes of such investigation and action a Group Monitoring Committee shall be constituted at the Group level and Internal Complaint Committees (ICC) at the unit or location level
- 6.3** Whereas the Internal Complaints Committee will be responsible for the investigation of any complaints of sexual harassment, the Group Monitoring Committee will monitor whether an appropriate culture that prevents such instances and educates the workforce in steps to create such a work environment
- 6.4** The ICC will in the first instance see if a conciliation between the complainant and the accused person is possible. In that case, the ICC will resolve the issue to the satisfaction of the Complainant. It may issue an appropriate warning or other action against the accused person
- 6.5** If conciliation is not possible, the ICC will investigate the complaint fully, using principles of natural justice. If the complaint is proven it will take appropriate disciplinary action or else close the investigation
- 6.6** If it emerges during the course of the investigation that a false or malicious complaint was deliberately filed, appropriate action will be initiated against the Complainant.

7.0 Procedures:

- 7.1** Constitution of GMC, ICC:
All committees constituted under this policy will be headed by a senior woman member of the relevant leadership team. The majority of members shall be women. Where required external representatives can be made a part of the Committee or co-opted in specific cases.
- 7.2** A report shall be prepared by the relevant ICC at the conclusion of an investigation to the GMC. The GMC may modify the recommended disciplinary action.
- 7.3** Confidentiality: All procedures under this policy, and related documentation will be treated as confidential, and the identity of the complaint will not be disclosed outside the proceedings.

This policy will be distributed and made accessible widely across the organization.