

POLICY FOR THE PROHIBITION, PREVENTION, AND REDRESSAL OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

1. COMMITMENT:

The Ravalgaon Sugar Farm Ltd. (*hereinafter referred to as the Company*) is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. the Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

2. SCOPE:

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company. the Company will also not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. The workplace includes.

- a. All offices or other premises where operations of the Company are conducted
- b. All the Company-related activities performed at any other site away from the Company's premises.
- c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations

3. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Inappropriate conduct could also be a joke, a prank or even a compliment. Sexual Harassment at the workplace includes.

- a. Physical contact and advances; or
- b. A demand or request for sexual favours; or
- c. Making sexually coloured remarks; or
- d. Showing pornography; or
- e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

4. COMPLAINTS COMMITTEE:

The Company has instituted an Internal Complaints Committee ("Complaints Committee") for redressal of sexual harassment complaints (made by the victims) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following:

- a. Presiding Officer - 1 member
- b. Internal Member - 2 members
- c. External Member - 1 member

The Complaints Committee is responsible for:

- a. Investigating every formal written complaint of sexual harassment
- b. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment

- c. Discouraging and preventing employment-related sexual harassment

5. COMPLAINT MECHANISM:

An employee with a harassment concern may make a complaint to the Presiding Officer of the Complaints Committee 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 Presiding Officer to contact them and take the matter forward.

To ensure the prompt and thorough investigation of a sexual harassment complaint, the complainant should provide as much of the following information as possible:

- a. The name, department and position of the person or persons allegedly causing the harassment.
- b. A description of the incident(s), including the date(s), location(s) and the presence of any witnesses.
- c. The effect of the incident(s) on the complainant's ability to perform his or her job, or on other terms or conditions of his or her employment.
- d. The names of other individuals who might have been subject to the same or similar harassment.
- e. What, if any, steps the complainant has taken to try to stop the harassment.
- f. Any other information the complainant believes to be relevant to the harassment complaint.

The Presiding Officer of the Complaints 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, 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 Presiding Officer will record this finding with reasons and communicate the same to the complainant.

If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Complaints Committee.

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

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 Director from time to time.

The Complaints Committee will ensure corrective action 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.

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

If the Complainant or the Respondent is dissatisfied with the decision of Complaints Committee, she or he may appeal specifying the reasons in writing to the Managing Director.

6. DISCIPLINE:

Employees who violate this policy are subject to appropriate discipline. If an investigation results in a finding that this policy has been violated, the mandatory minimum discipline is a written reprimand. The discipline for very serious or repeat violations is termination of employment. Persons who violate this policy may also be subject to civil damages or criminal penalties.

7. CONFIDENTIALITY:

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. 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.

8. 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.

9. 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.

10. CONCLUSION:

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