

**DHANLAXMI COTEX LIMITED**  
**CIN: L51100MH1987PLC042280**

**SEXUAL HARASSMENT POLICY**  
**(FOR PREVENTION, PROHIBITION & REDRESSAL)**

**Objective**

The Company aims to be a gender neutral workplace providing equal employment opportunity to its employees. The objective of this policy is to place adequate measures on employee safety and security at workplace thereby providing a safe and healthy environment for employees.

**Applicability**

The policy is applicable to all employees of the Company and within the business precincts of the Company's offices and the factory.

**Definitions**

**"Sexual Harassment"** unless there is anything repugnant in the subject or context, means

- Any unwelcome, sexually determined behavior, direct or by implication, and includes any physical contact and advances;
- Demand or request for sexual favors, sexually coloured remarks, unsavoury remarks;
- Showing pornography, any other unwelcome physical (for example, touching or brushing against any part of the body and the like, etc.) and
- Verbal or non-verbal conduct having sexual overtones.

For the purposes of this policy "Sexual Harassment" shall include, but will not be confined to the following:

- Unwelcome sexual advances, requests for sexual favours, and/ or verbal or physical conduct of a sexual nature made, either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any company activity;
- Unwelcome sexual advances and/ or verbal, non-verbal or physical conduct such as loaded comments, remarks or jokes, letters, phone calls or through e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds or display of a derogatory nature that have the purpose or effect of interfering with an individual's performance or of creating an intimidating, hostile or offensive environment;
- Forcible physical touch or molestation;
- Eve teasing, innuendos and taunts and any other act likely to impinge upon one's privacy;
- Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the workplace hostile or intimidating to a person belonging to the other/ same sex;
- Any such conduct committed by a third party or outsider in relation to an employee of the Company, or vice versa during the course of employment.

"Employee" means any person on the rolls of the Company to whom this policy is applicable including temporary, part time, honorary employees by whatever name called and would include employees engaged on a casual or project basis and also engaged through a contractor.

**"Competent Authority"** means the HR Manager of the Company.

**Scope**

This Policy will be applicable to all allegations of Sexual Harassment made by an Employee / third party or against an Employee / third party, irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises.



### Complaints Committee (herein referred as 'CC')

The Complaints Committee of the Company is as follows:

Chairperson & Presiding Officer: **Mrs. Kamla Jawar**

Email: [rjhawar@gmail.com](mailto:rjhawar@gmail.com)

Ph: +91 9322275723

Committee Member/ Coordinator :**Mr. Ramautar Jawar**

Manager – HR Committee Member :**Mr. R.K. Pandey, Manager – HR**

Committee Member :**Mr. Mahesh Jawar**

Manager Committee Member (External): (TBD): **Mrs Jayashree Iyer**

Sexual Harassment complaints can be registered with any of the above mentioned Committee members.

### Grievance Procedure

- Any Employee (“**Complainant**”) may lodge a complaint of Sexual Harassment (“**Complaint**”) against an Employee / third party (“**Accused**”), with any of the members of the ‘CC’ within 30 days from the date of occurrence of the alleged incident. If the Complainant feels that she/he cannot disclose her/his identity for any particular reason with the ‘CC’ members, she/ he can address the complaint to the Competent Authority.
- Such a Complaint may be oral or in writing.
- If the Complaint is oral, the same shall be put in writing by the hearing authority and shall be signed on every page, by the Complainant.
- The CC will hold a meeting with the Complainant latest within a period of 30 (thirty) days within the receipt of the Complaint and advance intimation of the scheduled meeting will be given to the Complainant.
- At the first meeting of the CC, the Complainant shall be heard and her/ his statement recorded (“**Statement of Allegation**”).The Complainant can produce any proofs (written, audio or video, etc) to substantiate her/ his Complaint. The same should be registered by the CC in the Statement of Allegation.
- If prima facie, the CC is certain about the validity of the Complaint, the CC should provide to the Complainant the opportunity of a transfer or leave or work from home. If the Accused is working in the same department/ location, the transfer of the Accused should take precedence over the Complainant.
- Thereafter, the Accused will be called for the meeting with the CC where he/ she will be briefed about the allegation. The Accused will be given an opportunity to give an explanation in the interest of principles of natural justice.
- If the Accused accepts the allegation, the CC will close the enquiry with its recommendations to the Competent Authority.
- If the Accused refutes the allegation, then an “**Enquiry**” shall be conducted by the CC. This Enquiry should normally be completed within 90 days from the date of meeting with the Accused. The CC can appoint a ‘POC’ (point of contact) within the Committee to carry out the enquiry. The employees of the Company are expected to provide their unequivocal support to the Enquiry.
- The report on the Enquiry should be submitted to the Competent Authority within 10 days of closure of Enquiry.
- The Competent Authority shall act on the Enquiry findings within 60 days of the receipt of Enquiry report as per the provisions of the Company’s Code of Conduct.
- In the event of a major misconduct, the Company shall also inform appropriate government authorities after taking written approval from the Complainant. If the Complainant refuses to approve of the proposal to inform the government authorities, the same should be recorded in writing and filed along with the Enquiry report.
- In case the Complaint registered by the Complainant is found to be false or done with malicious intent, the Complainant shall be liable for appropriate action including termination of employment.

