

Policy on Prevention of Sexual Harassment at the Workplace

Overview.....	2
1. Our Duties as an Employer	2
2. Responsibilities of Individuals	2
3. Objectives	2
4. Scope	2
5. Redressal Mechanism.....	3
5.1. Internal Committees (ICs).....	3
5.2. Lodging a complaint.....	3
5.3. Redressal through conciliation	3
5.4. Redressal through formal inquiry.....	4
5.5. Interim Relief	4
5.6. Third Party Harassment.....	5
5.7. Malicious / False Complaints.....	5
6. Confidentiality	5
Annexure 1: Definitions.....	6
Sexual harassment.....	6
Aggrieved Person.....	6
Respondent.....	6
Employee	7
Workplace.....	7
Employer.....	7
Complainant	7
Annexure 2: Constitution of the Internal Committees linked to four geographical locations.....	8
Annexure 3: Points for a well drafted complaint	9
Annexure 4: Process Flow.....	10
Annexure 5: Timelines in respect of Inquiry.....	11

Policy on Prevention of Sexual Harassment at the Workplace

Overview

1. Our Duties as an Employer

Pidilite is committed to building an inclusive workplace which protects the interests of all employees and promoting a gender sensitive environment where all employees can work together, without the fear of Sexual harassment, exploitation or intimidation in any form.

Further, our collective vision as an organization is to “create a world class Indian multinational, where it is a pleasure to work”, and building an inclusive workplace is one of the crucial priorities in such an effort.

2. Responsibilities of Individuals

It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- i. Refusing to participate in any activity which constitutes harassment.
- ii. Supporting the person to reject unwelcome behaviour.
- iii. Acting as a witness if the person being harassed decides to lodge a complaint.

All employees at Pidilite Industries Limited and its subsidiaries* must ensure that nobody is subjected to harassment and there is equal treatment. They must also ensure that all Employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the Complainant, Respondent/s, and/or witnesses are not victimized in any way.

3. Objectives

- To provide protection against Sexual harassment at the Workplace and for the prevention and redressal of complaints of Sexual harassment and for matters connected therewith or incidental thereto.
- To set forth the expectations of conduct and mutual respect at the Workplace with a focus on prevention of Sexual harassment, its prohibition and the redressal mechanism if these expectations are not met or violated.
- To ensure compliance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the “Pidilite Code of Conduct”

4. Scope

- This Policy extends to all employees of Pidilite Industries Limited and its subsidiaries*/ companies under the same management and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. In the event any of the subsidiary/company under the same management has a separate Posh policy as may be required as per the applicable local laws, the same shall prevail over this Policy with respect to such subsidiary/company under the same management.

The terms referred to in this policy are summarized in Annexure 1

5. Redressal Mechanism

5.1. Internal Committees (ICs)

To prevent, prohibit instances of Sexual harassment and to receive and effectively redress the complaints pertaining to the same, "Internal Committees" have been constituted for four geographical regions.

Two Internal Committees have been formed for Pidilite Industries Limited and its subsidiaries* / Companies under the same management are linked to the four geographical regions:

1. **Western Region** (comprising of states of Goa, Gujarat, Maharashtra).
2. **Southern Region** (comprising of states of Andhra Pradesh Karnataka, Kerala, Tamil Nadu, Telangana).
3. **Northern Region** (comprising of states of Madhya Pradesh Uttarakhand, Bihar, Uttar Pradesh, Chhattisgarh, Haryana, Himachal Pradesh, Punjab, Rajasthan).
4. **Eastern Region** (comprising of states of Arunachal Pradesh, Assam, Jharkhand, Odisha, West Bengal, Manipur, Meghalaya, Mizoram, Nagaland, Sikkim, Tripura).

The constitution of the IC is more specifically provided in Annexure 2 of this policy.

5.2. Lodging a complaint

An Aggrieved Person who intends to file a complaint is required to submit a written complaint, along with supporting documents and names and addresses of the witnesses, wherever possible to the IC, **within three months from the date of the incident.**

In case of a series of incidents, the complaint must be lodged **within three months of the date of the last incident.**

List of points which may be included as part of the complaint are provided in Annexure 3 to this Policy.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the IC shall render all reasonable assistance to the person for making the complaint in writing.

5.3. Redressal through conciliation

Once the complaint is received, before initiating the inquiry, the IC may take steps to settle the matter between the Complainant and the Respondent through conciliation. This may be done only if requested by the Aggrieved Person. It is however to be noted that no monetary settlement shall be made as a basis of conciliation.

In case a settlement is arrived at, the IC shall record the settlement so arrived and forward the same to the Employer for taking action as specified in the recommendation.

The IC shall provide copies of the settlement to the Aggrieved Person and the Respondent. Once a settlement is arrived, no further inquiry shall be conducted by the IC.

5.4. Redressal through formal inquiry

A. Decision by IC to pursue the case

The IC shall, within seven working days from receipt of a complaint, establish a prima facie case of Sexual harassment on the basis of the definition of Sexual harassment as given in this policy. Reasons for not pursuing a complaint must be recorded in the minutes and made available to the Complainant in writing.

The IC shall make inquiry into the complaint in accordance with the principles of natural justice.

B. Conduct of Inquiry

- If the IC decides to pursue the case, the IC shall a copy of the Complaint received from the Aggrieved Person to the Respondent within a period of seven working days.
- The IC shall make inquiry into the complaint in accordance with the principles of natural justice.
- The IC may terminate the inquiry or pass an *ex parte* decision on the complaint.
- The parties to the complaint shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
- In conducting the inquiry, a minimum of three members of the IC including the Presiding Officer and the External Member shall be present.

C. Evidence

- I. If the Complainant or the Respondent desires any witness(es) to be called, they shall communicate in writing to the IC the names of witness(es) whom they propose to call.
- II. If the Complainant or the Respondent desires to tender any documents by way of evidence before the IC, he / she shall supply original copies of such documents and shall testify them to be originals.

D. Submission of Report & Disciplinary Action

- On completion of the enquiry, the IC shall provide a written report of its findings with reasons for its conclusions to the Employer (i.e., a triage comprising of Chief Human Resource Officer, Director-Operations and President-Legal) for further action. Such report shall also be made available to the Complainant and the Respondent.
- The recommendations of IC shall be reviewed by the triage and action for misconduct as per the service rules may be initiated by the Employer in addition to any other action as may be recommended by the IC.
- Where the conduct of the Respondent amounts to a specific offence under the Indian Penal Code and/or any other law, the Company will initiate appropriate action in accordance with such law by making a complaint to the appropriate authority i.e. a criminal case may be filed (if deemed fit) by the Company.
- Where the IC arrives at a conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.

A summarized process flow is given in Annexure 4 of this policy.

5.5. Interim Relief

During pendency of the inquiry, on a written request made by Aggrieved Person, the IC may recommend to the Employer to provide interim measures such as:

- i. transfer the Aggrieved Person or the Respondent to any other Workplace.
- ii. grant leave to the Aggrieved Person up to a period of three months (this shall be in addition to her regular statutory/ contractual leave entitlement);
- iii. restrain the Respondent from reporting on the work performance of the Aggrieved Person or writing her confidential report, and assign the same to another officer.

5.6. Third Party Harassment

Where sexual harassment occurs as a result of an act or omission by any third party or outsider at the workplace, the Company will take all steps necessary to assist the affected person in terms of preventive action and support for initiating appropriate action in accordance with law (under the Indian Penal Code or any other law).

5.7. Malicious / False Complaints

In case the Complainant is found to have made a false complaint and/or for ulterior motives/reasons under the garb of Sexual harassment it will be treated as a major misconduct and appropriate disciplinary/penal action will be taken against such Complainant.

6. Confidentiality

Recognising the sensitivity attached to matters pertaining to Sexual harassment, the members of the IC will ensure that the complaint and connected information are kept confidential, including the contents of the complaint, the identity and addresses of the Complainant, Respondent, witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC etc.

Annexure 1: Definitions

Sexual harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- i. Physical contact and advances; or
- ii. Demand or request for sexual favours; or
- iii. Making Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body; or
- 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.; or
- v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes; or
- vi. Giving gifts or leaving objects that are sexually suggestive; or
- vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; or
- viii. Persistent watching, following, contacting of a person; or
- ix. Physical and/or verbal or non-verbal or conduct, such as loaded comments, remarks or jokes, letters, phone calls, SMS or emails, gestures; or
- x. When any person uses with a sexual purpose, the body or any part of it or any object as extension of body in relation to another person without his/her consent or against his/her will, such conduct shall amount to sexual assault; or
- xi. Spreading rumours about an employee's sexual relationship; or
- xii. Abetment to any or all of the above
- xiii. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among others, if it occurs or is present in relation to or connected with any act or behaviour of Sexual harassment, may amount to Sexual harassment:

- i. Implied or explicit promise of preferential treatment in employment; or
- ii. Implied or explicit threat of detrimental treatment in employment; or
- iii. Implied or explicit threat about present or future employment status; or
- iv. Interference with work or creating an intimidating or offensive or hostile work environment ; or
- v. Humiliating treatment likely to affect health or safety.

Aggrieved Person

In relation to a Workplace, a person, of any age whether employed or not, who alleges to have been subjected to any act of Sexual harassment by the Respondent.

Respondent

A person against whom a complaint of Sexual harassment has been made by the Aggrieved person.

Employee

A person employed at a 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 by any other such name.

Workplace

In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place where the Aggrieved Person or the Respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Pidilite Industries Limited, including transportation provided by the Employer for undertaking such a journey.

Employer

A person responsible for the management, supervision and control of the Workplace

Complainant

A complainant is the person who lodges a complaint.

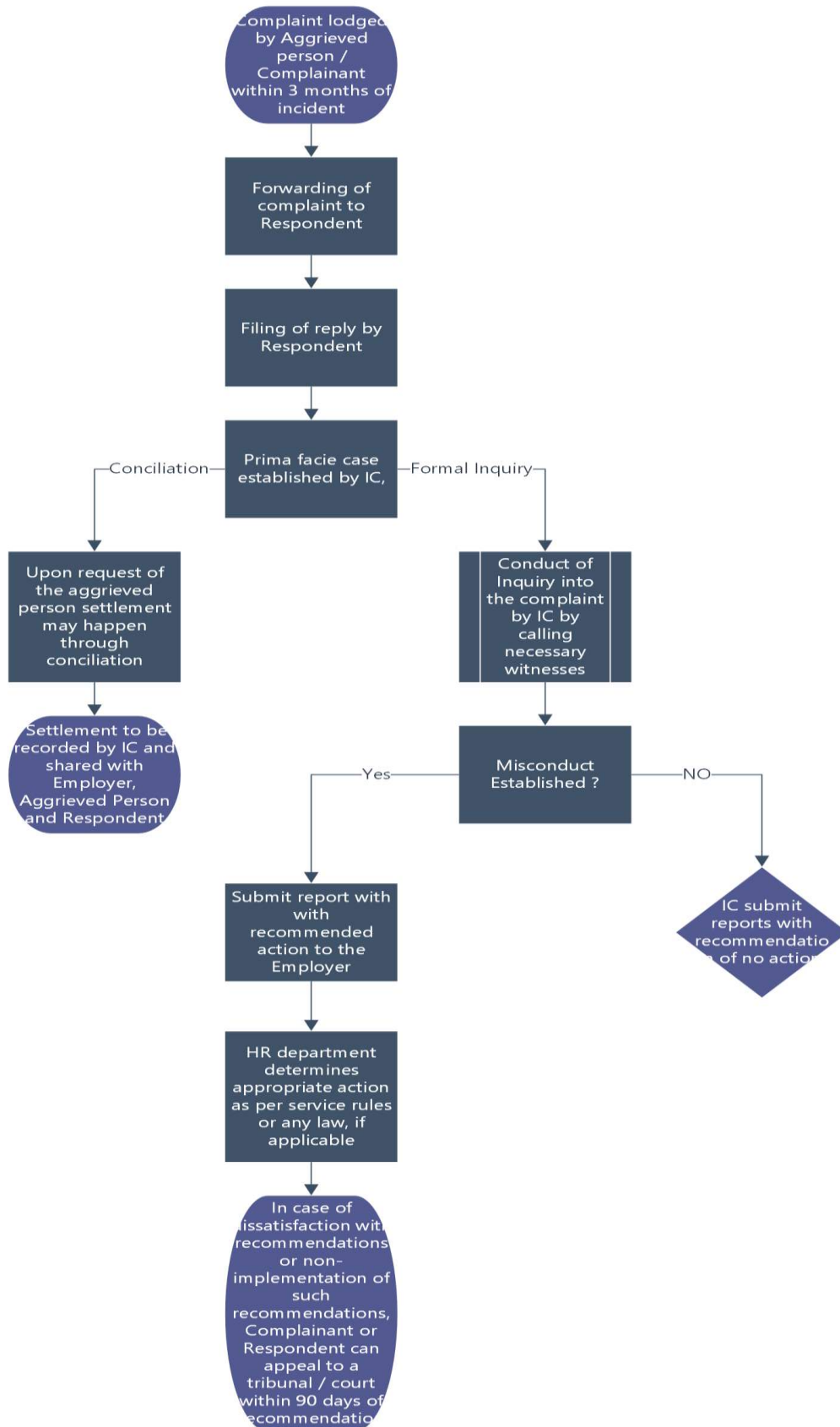
Annexure 2: Constitution of the Internal Committees linked to four geographical locations

Core IC-1- Western & Southern Region			
Scope of the Committee	List of Members	Contact Number	Email Id
<u>Workplaces of Pidilite located in the Western & Southern region including:</u> <ul style="list-style-type: none"> HO Field Branch Offices Factories, warehouses etc. 	Priyadarshini Ganapathy (Presiding Officer)	9892123706	priyadarshini.ganapathy@pidilite.com
	Neha Parashar	9167932491	neha.parashar@pidilite.com
	Pooja Tandon	9833801061	pooja.tandon@pidilite.com
	Seema Haridasan	9820754733	seema.haridasan@pidilite.com
	Salov Kumar Singh	9860625170	salov.singh@pidilite.com
	Sitar Mohammad	9816036150	sitar.mohammad@pidilite.com
	Sneha Khandekar (External Member)	9819770166	snehakhandekar@hotmail.com
Core IC-2- Eastern & Northern Region			
<u>Workplaces of Pidilite located in the Eastern & Northern region including:</u> <ul style="list-style-type: none"> Field Branch Offices, Factories, warehouses etc. 	Pooja Tandon (Presiding Officer)	9833801061	pooja.tandon@pidilite.com
	Neha Parashar	9167932491	neha.parashar@pidilite.com
	Priyadarshini Ganapathy	9892123706	priyadarshini.ganapathy@pidilite.com
	Seema Haridasan	9820754733	seema.haridasan@pidilite.com
	Salov Kumar Singh	9860625170	salov.singh@pidilite.com
	Sitar Mohammad	9816036150	sitar.mohammad@pidilite.com
	Sneha Khandekar (External Member)	9819770166	snehakhandekar@hotmail.com
<p>**The IC for subsidiaries will consist of the Core committee members and the subsidiary company representatives as nominated.</p> <p>** The Core IC committee shall remain common for the group companies where Pidilite holds major stakeholding or has board representation</p> <p>However, if any group company is having its own POSH policy already framed and implemented, the same will be considered for that group company.</p>			

Annexure 3: Points for a well drafted complaint

- The complaint should be addressed to the Presiding Officer and not the employer/HR representative.
- The complaint should be concise, i.e. it should be written in simple language which can be understood easily. Complaints that are well written and presented properly have greater credibility. Details of exact incident, date and time, witness etc. to be included.
- Circumstances preceding and following the incident to be recorded.
- Whether the complainant asked the Respondent to desist from the unwelcome act(s).
- Append as many documents as possible in whatever format i.e., relevant e-mails, screenshots of SMS's/ WhatsApp messages, call details, photographs, recordings etc.
- Details of the Respondent including name, designation, reporting structure between complainant and Respondent if any (whether subordinate, colleague or superior).
- Do not state any fact that is false or incorrect.
- The relief that is sought from the employer.

Annexure 4: Process Flow



Annexure 5: Timelines in respect of Inquiry

Particulars	Timelines	Remarks
Filing of written complaint	Within three months of the date of incident.	Written complaint along with supporting documents and names and addresses of witnesses to be provided. Timeline is extendable for a maximum of 3 months at the discretion of the IC.
Forwarding complaint copy to Respondent	Seven working days from receipt of the complaint	Complaint copy received from Complainant to be forwarded by IC to Respondent.
Filing of reply by the Respondent	Ten working days from the receipt of the copy of complaint	Reply to the complaint along with a list of supporting documents and names and addresses of witnesses to be provided to IC.
Notice prior to termination of inquiry of passing of exparte order	Fifteen days in advance	Notice to be given by IC to concerned party.
Completion of Inquiry	Within ninety days from the date of receipt of complaint.	-
Submission of Inquiry report	Within ten days from date of completion of inquiry	IC shall provide a report of its findings to Employer and to the Complainant and the Respondent as well.
Action by the Employer	Within sixty days of report by Employer	-
Appeal against the recommendation of IC	Within ninety days of the recommendation	Person aggrieved by the recommendation may prefer appeal to the Court or tribunal as may be prescribed
