

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORK PLACE

1. Introduction

We as a Company respects the dignity of all employees working for the Company irrespective of their gender or hierarchy and we expect responsible conduct and behaviour on the part of all our employees at all levels. Providing for a safe and congenial work environment to all employees is an integral part of the Company's employment policy.

2. Objective

This policy has been framed with a view to:

- Promote a workplace based on equality & respect.
- Provide a safe and congenial work environment.
- Awareness & sensitization about sexual harassment at the workplace.
- Prevent sexual harassment.
- Provide formal and informal mechanism for redressal in case of complaint of sexual harassment at the workplace.
- Define the implications and outcome of sexual harassment.
- Ensure protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

3. Scope

This policy shall be applicable to all employees of AXEL POLYMERS LIMITED ("APL") and its subsidiaries (if any) including any associate engaged on fixed term contract, short term engagement, temporary, apprentice, trainees, contract persons and visitors on our premises. It shall also include any unwelcome behaviour of a sexual nature mentioned in the policy by any Vendor/Supplier/Contractor including their agents, supervisors, managers and their employees to any of our employees on our premises.

4. Definitions and Abbreviations

4.1 Sexual Harassment:

Sexual harassment includes such unwelcome sexually determined behaviour (whether direct or by implication) such as:

- a) Physical contact and sexual advances;
- b) Demand or request for sexual favours;
- c) Sexually - coloured remarks;
- d) Showing pornography; and
- e) Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.



4.2 "Unwelcome sexually determined behaviour"

"Unwelcome sexually determined behaviour" includes but is not limited to:

- Subjecting another person to an unwelcome act of physical intimacy including grabbing, brushing, touching, including sexual flirtations, advances or propositions.
- Making any unwelcome remark with sexual connotations like sexually explicit, remarks, cracking jokes or using sentences with sexual connotations or making sexist remarks etc.
- Showing any sexually explicit visual material in the form of pictures / cartoons / pinups / calendars / screen-savers on computers / any offensive written or electronic material / including pornographic.
- Engaging in any other unwelcome conduct of a sexual nature, verbal or even nonverbal, staring to make the other person uncomfortable, making offensive gestures, etc.
- Sending unwelcome communication of a sexual nature, through e-mail, letter, mobile technology or any other form of written or electronic communication, exhibiting conduct of a sexual nature.
- Making an unwelcome demand or request whether directly or by implication for sexual favours and/or making it a condition of employment / payment of wages / increments / promotion / preferential treatment / threat to detrimental treatment in employment / threat to current or future employment status or similar act.
- Where a supervisor requests sexual favours from a junior (or any other person) in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits or continued employment or threatens to terminate any such person for non-co-operation.
- Where a boss or other senior person intrudes into the private life of employees or persistently asks them out.
- Where any employee(s) make(s) sexual epithet, jokes, written or oral references to sexual conduct, and/or gossip regarding one's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable.
- Behaviour which creates an environment that is intimidating, hostile, offensive, humiliating for any employee.



4.3 Workplace:

Any place where working relationship and/or employer-employee relationship between the company and the person exists. This includes our premises (including transit houses & guest houses) and any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

4.4 Aggrieved Person:

In relation to 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.

4.5 Respondent:

Against whom the aggrieved person has made a complaint.

5. Responsibilities

- CEO/CFO/
MD**
 - Shall be responsible for constitution of the Internal Complaint committee
 - Shall be responsible for implementation of actions recommended by internal complaint committee through Head HR, in case of any reported misconduct
- Head, HR**
 - Shall be responsible for dissemination of this policy to all employees and maintaining a record of the same.
- Employees**
 - Shall be responsible for compliance with the policy
 - Shall be responsible for reporting to internal Complaint committee in case of any misconduct.

6. Statement of Policy

APL is committed to prevent sexual harassment of women at work place and has adopted a zero-tolerance approach towards such behaviours by its employee, consultants, staff and visitors to its premises and work place.

APL will implement a process to sensitize its employees towards this policy and the consequences of non-compliance.

APL has adopted this policy to preserve its reputation as an ethical corporate entity as well as reputation of its employees. This document will require approval of the Board of Directors in case of any change except for change in the constitution of internal complaint committee.



7. Implementation of the policy

7.1 Constitution of Internal Complaint Committee

The Internal complaint committee shall be constituted which will consist of the following

- Presiding Officer – A Woman employed at a senior level amongst the employees
- At least 2 members from employees committed to the cause or having legal knowledge
- One external member familiar with issues relating to sexual harassment

At least one half of the total members of the Committee shall be women.

A quorum of 2 members is required to be present for the proceedings to take place.

The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

Current nominated members of the Internal Complaints Committee of the Company are specified in **Annexure A**.

7.2 Dealing with the Complaint

- 7.2.1 It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the Internal Complaints Committee of any instance or behaviour of sexual harassment by a co-worker towards another employee.
- 7.2.2 The concerned employee shall give his complaint in writing to the Chairperson of the Committee giving details of the incident within a week of its occurrence.
- 7.2.3 Once the complaint is received, it will be kept strictly confidential.
- 7.2.4 The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.
- 7.2.5 The Committee shall ensure that a fair and just investigation is undertaken immediately.
- 7.2.6 Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- 7.2.7 The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.
- 7.2.8 The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer.



7.3 Disciplinary Action

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

7.4 Confidentiality

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

7.5 Protection against retaliation

Regardless of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the Committee shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused. Any unwarranted pressures, retaliatory or any other type of unethical behaviour from the accused against the complainant while the investigation is in progress should be reported by the complainant to the Complaints Committee as soon as possible. Disciplinary action will be taken by the Complaints Committee against any such complaints which are found genuine.

7.6 Documentation

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's files with the full report of the Internal Complaints Committee.

7.7 Dissemination of the Policy

A copy of this Policy is available on the website of the Company.

7.8 Complaints made with a malicious intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.



8. Reference document(s)

- Companies Act, 2013
- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

Annexure A

Internal Complaint Committee Composition

Members of the Internal Complaint Committee of Axel Polymers Limited ("APL") are as under:

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|----|------------------------------|-------------------|
| 1. | Mrs. Pooja Mehta | Presiding Officer |
| 2. | Mr. Kaushal Patel | Member |
| 3. | Mrs. Vaishali Maladkar | Member |
| 4. | Dr. (Mrs.) Minnie Bodhanwala | Member (External) |

