



Policy on Sexual Harassment and Gender Neutrality in Gujarat Themis Biosyn Ltd.

1. Need for Policy:

Gujarat Themis Biosyn Ltd. employs women in its work places.

Gujarat Themis Biosyn Ltd. aims at giving equal opportunity to its employees irrespective of Gender, Religion, Caste or Community.

Gujarat Themis Biosyn Ltd. also aims to assure its employees that all efforts to avoid Sexual harassment will be made by the Company and also to provide appropriate justice to its aggrieved employee in case of occurrence of Sexual Harassment.

2. What is Sexual Harassment?

The scope of this policy is to relate sexual harassment at the workplace only. Workplace means the normal working premises / places during official tour of the employees which will also include places like client premises, Hotel Stay, guest house, etc. on official duty.

Sexual harassment includes any one or more of the following incidences whether direct or implicit:

- Incidences of sexually colored remarks, jokes, innuendos, taunts, pet names;
- Gender based insults or remarks;
- Any indecent gesture, indecent language, or any act intended to insult the modesty of a woman
- Touching or brushing against any part of the body etc.
- Unwelcome sexual hints/ suggestions by using any communication whether oral or written.
- Forcible physical touch or molestation;
- Conversation improperly made towards sexual preferences, fantasy, or sex life;
- Physical confinement against one's will and any other act likely to violate one's privacy;
- Sexual Harassment may be done by a person individually or acting with others.
- Sexual Harassment may be directed at either males or females
- It could occur between individuals in a hierarchical relationship like superiors & subordinates, seniors & juniors etc.
- Sexual Harassment caused by threatening, coercing, or intimidating an employee to accept sexual advances in exchange for something.
- Showing Pornography.



3. Complaints Committee:

The Complaints Committee shall aim at redressal of the sexual harassment complaints and thereby achieving gender neutrality policy in the company. The Committee shall consist of four members i.e. 2 female & 2 male members. The Presiding Officer of the Committee shall be a Female who shall be a senior level employee.

The first committee shall consist of following members:

1. Ms. Aruna Khedkar – Presiding Officer (Senior Level Employee)
2. Mr. Nayan Kumar Singh – Employee member
3. Mr. Rudrapratap Singh Chouhan – Employee Member
4. Mrs. Indu Agarwal – NGO Representative

The term of the committee shall be three years or in case of resignation / retirement / death of a committee member the vacancy so caused shall be filled in by the Board of Directors of the Company or by any person so authorized by the Board.

The scope of the committee, apart from listening & deciding the complaints will also to formulate the policy from time to time depending on the current circumstances & business and social dynamics. This however, will have to be approved by the Board of Directors.

4. Complaint Process:

- A written complaint should be made by the aggrieved person to any of the committee members within a period of three months from the date of alleged incidence.
- The complaint should contain all facts relating to alleged sexual harassment.
- The complaint should contain the name against whom the complaint is lodged.
- Committee members are expected to keep confidentiality of the matter.
- The Committee should initiate action by enquiring within a reasonable period but not exceeding four working days.
- The enquiry should be completed within 30 days of the date of the complaint
- The Committee should give opportunity to both the parties (i.e. the Complainant & the accused) of presenting their views and supporting proofs & documents, if any.
- The Committee should submit its recommendations to the Managing Director / Dy. Managing Director within seven working days of the completion of the enquiry process.
- The committee should also recommend the appropriate punishment / disciplinary action like verbal warning, suspension or termination of employment to the erring party.
- In case the circumstances as well as findings of the committee demands, appropriate criminal proceedings should be initiated.



- While disposing of the complaint the Committee should also keep in mind the provisions of Indian Penal Code as well as the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

5. Guidelines to Employees:

- ✓ The objective of this policy is to ensure dealing with the sexual harassment cases in such a manner that the environment at work place is free from threat or fear. The ultimate aim is to minimize the occurrences of sexual harassment cases in the workplace of Themis.
- ✓ The Employees, especially the female employees are expected to be firm and communicate their un-acceptance to the offenders conduct whether it be spoken , physical , indecent gestures, media communication such as mobile /telephone calls, SMS's, emails etc.
- ✓ Try avoiding the colleague who makes you uncomfortable. If it is unavoidable, communicate your disapproval to the offender and tell him to stop his 'inappropriate behaviour'.
- ✓ Keep a record of the incidence as soon as it happens. Gather evidence; write down the date, time and nature of harassment.
- ✓ Make a formal complaint to your direct manager and the HR department with all the evidence you have against the offender.
- ✓ Oral warning should first be given to the offender followed by written warning by keeping the HR dept. in the loop. If the aggrieved is not able to take appropriate action in a situation, one should meet the HR Manager / Dept for getting their counsel
- ✓ The HOD's / Managers are expected to guide the complainant appropriately to initiate the action against erring person without fear. It is also expected that the privacy of the both the complainant & the accused is maintained.
