



USHANTI COLOUR CHEM LIMITED

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SEXUAL HARASSMENT POLICY

(Modified in the Board Meeting dated 29th May, 2025)

1. INTRODUCTION

Ushanti Colour Chem Limited (the “Company”) believes in the conduct of its affairs in a fair and transparent manner to foster professionalism, honesty, integrity and ethical behavior. The Company is committed to developing a culture where it is safe for all the employees to raise concerns about any misconduct or unacceptable practice by co-employee.

In accordance with Section 22 of Sexual Harassment of Women at work place (Prevention, Prohibition and redressal) Act, 2013, the Company shall have to implement policy to provide protection against Sexual Harassment of Women at work place and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto. The sexual harassment results in violation of the fundamental rights of women to equality under Articles 14 and 15 of the Constitution of India and their right to life and to live with dignity under Article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

It is required to implement this policy to protect the fundamental and human rights of the women against the sexual harassment at work place of the Company. This Policy extends to all employees of Ushanti Colour Chem Limited and those working for the company at any other locations.

2. OBJECTIVE

The Company is committed to adhere to the highest standards of ethical, moral and legal conduct of business operations. To maintain these standards, our Company is committed to providing work environment that ensures every employee is treated with dignity, respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. 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 when they are working in the Company.

The committee will put best efforts to create awareness among the employees in respect of Guidelines.

3. SCOPE

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at customer’s sites if any. The Company will not tolerate sexual harassment, if engaged in by customers or by suppliers or any other business associates.

4. DEFINITIONS

In this Policy, unless the context otherwise requires:

- (a) "**Act**" shall mean "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and the Rules framed thereunder, including any modifications, amendments, clarifications, circulars, notification, orders to remove difficulties or re-enactment thereof time to time.
- (b) "**Aggrieved Employee**" means any Employee of the Company or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace.
- (c) "**Internal Complaints Committee**" means a committee by that name, constituted from time to time by the Board of the Company as per the provisions of the Act.
- (d) "**Respondent**" means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.
- (e) "**Sexual Harassment**" means as per section 2(n) of Act –
"Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances or act or behavior (whether directly or by implication), requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- a. Physical contact and advances
- b. Unwelcome sexual advances (verbal, written or physical);
- c. Demand or Request for sexual favours;
- d. Any other type of sexually-oriented conduct;
- e. Verbal abuse or 'Joking' that is sex-oriented;
- f. Making sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- g. Showing pornography;
- h. Requests for sex or repeated unwanted requests to go out on dates;
- i. implied or explicit promise of preferential treatment in her employment;
- j. implied or explicit threat of detrimental treatment in her employment;
- k. implied or explicit threat about her present or future employment status;
- l. interference with her work or creating an intimidating or offensive or hostile work environment for her;
- m. humiliating treatment likely to affect her health or safety;
- n. Any physical, verbal, non-verbal conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and / or submission to such conduct is either an explicit or implicit term or condition of employment and / or submission or rejection of the conduct is used as a basis for making employment decisions.

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- o. Words and expressions used and not defined in the Policy shall have the same meanings respectively assigned to them in the Act or any other applicable law or regulation and as amended from time to time.

5. RESPONSIBILITIES REGARDING SEXUAL HARRASMENT

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

6. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS FOR SEXUAL HARRASMENT

The Company will follow the following procedure for resolving a complaint:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances.

Lodging a Complaint

An aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within a period of 3 months from the date of incident/ last incident. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.

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

1. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:
 - a. her relative or friend; or
 - b. her co-worker; or
 - c. an officer of the National Commission for Women or State Women's Commission; or
 - d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman
2. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:
 - a. her relative or friend; or

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- b. a special educator; or
- c. qualified psychiatrist or psychologist; or
- d. the guardian or authority under whose care she is receiving treatment or care; or
- e. any person who has knowledge of the incident jointly with the Aggrieved Woman's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care

The complaint shall be submitted by the complainant to the ICC in writing or shall be submitted to the ICC electronically at csucl@ushanti.com or purvittrivedi@gmail.com. The complaint can also be physically submitted to any ICC member.

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

- i. The name, department and position of the person or persons allegedly causing the harassment.
- ii. A description of the incident(s), including the date(s), location(s) and the presence of any witnesses.
- iii. 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.
- iv. The names of other individuals who might have been subject to the same or similar harassment.
- v. What, if any, steps the complainant has taken to try to stop the harassment.
- vi. Any other information the complainant believes to be relevant to the harassment complaint.

B. Complaints

1. After the receipt of complain the Presiding Officer of the ICC 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 15 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.
2. If the Presiding Officer of the ICC determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.
3. The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
 - Upon receipt of the complaint, the committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
 - Respondent shall reply with all supporting documents within 10 working days of

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receiving the copy of the complaint.

- Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.
 - The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
 - If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
 - The Committee shall call upon all witnesses mentioned by both the parties.
 - The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
4. 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 ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director(s) & Head of Department as soon as practically possible and in any case, not later than 45 working days from the date of receipt of the complaint. The Executive Director(s) & Head of Department will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action

The Corrective actions may include any of the following:

- i. Formal apology
- ii. Counseling
- iii. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- iv. Change of work assignment / transfer for either the perpetrator or the victim.
- v. Suspension or Termination of services of the Employee found guilty of the offence.
- vi. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation is to happen within 4 weeks of receipt of complaint.

7. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. 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.

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.

8. 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

9. REVIEW OF POLICY

This Policy is framed based on the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and the Rules framed thereunder and as amended from time to time.

In conclusion this policy, 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.

The Board of Directors of the Company shall have the right to amend the policy from time to time without assigning any reason whatsoever.

10. INTERNAL COMPLAINT COMMITTEE (ICC)

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Complaints Committee will comprise of the following members:

1. Mrs. Purvi Tapan Trivedi, Independent Director	Presiding Officer
2. Ms. Vishakha Tanwar, Company Secretary	Member

The Internal Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment;
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- Discouraging and preventing employment-related sexual harassment.