



Owner Department	Document Title	
Human Resources	Prevention of Sexual Harassment (POSH) of women at work places	

**NSL SUGARS LIMITED  
And its  
Subsidiary**


**Policy Name:  
PREVENTION OF SEXUAL HARASSMENT (POSH) OF WOMEN  
AT WORK PLACE  
(PREVENTION, PROHIBITION AND REDRESSAL)**

Document Author	Document Reviewer	Document Approver
<b>AGM HR(LnD)</b>	<b>GM - HR</b>	<b>CEO</b>

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## 1. OBJECTIVE / COMMITMENT

NSL Sugars Limited is committed to provide a work environment that ensures every women associate or employee is treated with dignity and respect and afforded equitable treatment. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women associates / visitors / employees are not subjected to any form of sexual harassment at the work place.

As a conscious and vigilant organization, NSL Sugars Limited believes in the conduct of the affairs of its constituents in a fair and transparent manner by adopting the highest standards of professionalism, honesty, integrity and ethical behavior.

This policy is formulated to comply with “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” which came into effect from 09.12.2013 for

- Providing protection against sexual harassment of women at workplace and prevent and redress complaints of sexual harassment.
- Providing an opportunity to employees to access in good faith, to the committee in case any woman is aggrieved by sexual harassment.

## 2. SCOPE AND EFFECTIVE DATE

This policy extends to all the employees of NSL Sugars Ltd and is deemed to be incorporated in the service rules and/or conditions and is applicable with immediate effect. The service rules shall prevail over the policy, wherever there is divergence.

## 3. DEFINITIONS


**3.1 “Act”** means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013;

**3.2. “Committee”** means internal complaints committee;

**3.3. “Complainant”** means In relation to the Workplace, alleges to have been subjected to harassment by the Respondent;

**3.4. “Employee”** means a person employed at a workplace for any work on regular, temporary, adhoc or daily wages basis, either directly or through an agent, including a contractor, with or, without 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 called by any other such name;

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**3.5. “Employer”** means any person responsible for the management, supervision and control of the work place. Management includes the person or Board or Committee responsible for formulation and administration of policies for such organization;

**3.6 “Incident”** means incident of sexual harassment;

**3.7 “Rules”** means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013;

**3.8 “Respondent”** In relation to the Workplace, any employee or visitor against whom the Complainant has made the complaint;

**3.9 “Sexual harassment”** includes any of the following unwelcome acts or behavior (whether directly or by implication) namely:

- Physical contact and advances; or
- A demand or request for sexual favours; or
- Making sexually colored remarks; or
- Showing pornography; or
- Any other unwelcome physical, verbal or nonverbal conduct of sexual nature.

Some of the behavior/actions listed below are an indicator for employee’s clarity only and should not be treated as limited to these alone.

**Physical Harassment which includes**

- Physical contact and advances;
- Intentional touching, pinching, grabbing, brushing against another’s body;
- Sexual assault;
- Cornering, trapping or blocking another’s pathway;
- Any physical conduct which is unwelcome;


**Written or Graphic Harassment**

- Showing pornography;
- The display of pornographic material;
- Written communication that has sexual implications;
- Leering or staring at another's body and / or suggestive gesturing;
- Displaying sexually visual material such as pinups, cartoons, graffiti, computer programmes, catalogues of a sexual nature;

**Verbal Harassment which includes**

- A demand or request for sexual favors;
- Making sexually colored remarks;

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- A demand or request for sexual favours over promises related to employment such as work conditions, promotion, and increments. This is known as "quid pro quo" sexual harassment;
- Gesture-based harassment eg. Sexually colored remarks;
- Making sexually suggestive or off color comments, threats, slurs, sexual propositions;
- Sexual jokes or teasing, misogynist humour, sexually colored gender specific jokes
- Sexual innuendoes and off color remarks;
- Comments about how someone looks, especially about parts of the body

The following circumstances may constitute sexual harassment if it occurs or is present in relation to or connected with:

- Implied or explicit promise of preferential treatment in employment;
- Implied or explicit threat of detrimental treatment in employment;
- Implied or explicit threat about present or future employment status;
- Interferes with work or creating an intimidating or offensive or hostile work Environment;
- Humiliating treatment likely to affect her health or safety;

**3.9 “Workplace”** includes any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit of the company 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 journey and any social, business or other functions (Events of the Company).

**4. POLICY**


The Company’s policy is to:

- Provide an equal employment opportunity;
- create a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment and believes that all employees of the Company, have the right to be treated with dignity Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable. The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

**5. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE**

NSL Sugars Limited as an integral part of its commitment to create an ambience in providing a conducive working environment for women which is safe, free from all forms of discriminations and conduct which can be considered harassing, coercive or disruptive including sexual harassment, has made provision of “Internal Complaints Committee” which is formed by the management to consider and redress complaints of sexual harassment. The members of the committee shall be nominated by the employer wherein at least half of the nominated members are women and shall hold the office for a period not exceeding 3 years.

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In order to prevent sexual harassment at workplace and to address this, the following Committee has been constituted:

S.No.	Name& Designation	Position	E-mail ID	Contact Number
1	Mrs. M. Bhaskara Mani	Chairperson	posh@nslsugars.com	9848002186
2	Mr. Divyaraj Pillai	Chief Counsel	posh@nslsugars.com	7760960754
3	Mrs.T.M.V.N. Kameshwari	Member	posh@nslsugars.com	7331140649
4	Mrs. Somasekharamma	Member- External	posh@nslsugars.com	9703858209

Any individual who either experiences or witnesses sexual harassment can report the incident to the Complaint Committee.

**The ICC is responsible for:**

- Dealing with all formal written complaints of Sexual Harassment from all the Workplaces of the Company.
- 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.

The Committee is empowered to conduct thorough investigation of complaints received, analyze and submit the report to the CEO for appropriate action.

**Quorum :**

Quorum of 3 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 should be a lady.


**6. REDRESSAL PROCESS**

**6.1 Written Complaint :** Any aggrieved women employee who feels and is being sexually harassed at workplace directly or indirectly may within a period of 3 months from the date of the incident submit a written complaint with her signature of the alleged incident to any member of the committee and in case of a series of incidents, within a period of three months from the date of last incident. (The time limit of 3 months may be further extended to another 3 months, if the committee is so satisfied)

**6.2 Notice to Respondent :** The committee on being satisfied shall forward one copy of complaint within 7 working days from the date of receipt of complaint to the respondent;

**6.3 Respondent's Reply :** The respondent shall file his reply along with his list of documents, and names and address of witness within a period not exceeding 10 working days from the date of receipt of

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a copy of complaint.

**6.4 Conciliation and Settlement :** The committee may before initiating an inquiry and upon the request of aggrieved woman take steps to settle the matter between her and respondent through conciliation and no monetary settlement shall be made through conciliation.

**6.5 Intimating Employer on Settlement :** The committee shall record the settlement so arrived, if any, and forward the same to employer to take action specified in the recommendation and provide the copies of settlement to the aggrieved women and respondent. No further inquiry shall be conducted.

**6.6 Inquiry or Police Complaint :** In the event, the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof. Where the aggrieved woman informs the committee that any term or condition under settlement has not been complied with by the respondent, the committee shall proceed to make an inquiry into the complaint or forward the case to the Police.

## 7. INQUIRY PROCESS

**7.1.** The committee shall proceed to make inquiry into the complaint where the complainant is an employee in accordance with the Rules and where both the parties are employees, on the basis of principles of natural justice, the parties shall be given an opportunity of being heard and a copy of findings shall be made available to both the parties enabling them to make representations against the findings before the committee.

**7.2.** In conducting inquiry, a minimum of three members of the committee including the Presiding Officer shall be present.

**7.3.** The committee shall have the powers of civil court under the Code of Civil Procedure, 1908 for making an inquiry and an inquiry shall be completed within a period of 90 days. The Committee shall within 15 working days, provide the reasons in writing to the employer where the inquiry is not completed within stipulated time.


**7.4.** The written request, if any, made by the aggrieved woman during the pendency of an inquiry the committee may recommend the employer to:

- a. Transfer the aggrieved woman or the respondent to any other workplace; or
- b. Grant leave to the aggrieved woman upto a period of 3 months which shall be in addition to the leave which she shall would be otherwise entitled; or
- c. Grant such other relief as the aggrieved women may request, if appropriate.

**7.5.** The employer shall implement the recommendation and forward the report to the committee within 30 days of receipt of recommendation or give reasons for delay in Form IV.

**7.6.** The committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings conveyed by chairperson or presiding officer by giving 15 days advance notice to the party concerned.

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## 8. INQUIRY REPORT

- 8.1** The committee shall provide a report on its findings to the employer and concerned parties within 10 days from the date of completion of inquiry.
- 8.2** Where the allegation against the respondent is not proved, the committee shall recommend the employer not to take any action and if the allegations are proved, the committee shall recommend the employer:
- a) To take action for sexual harassment as a misconduct in accordance with the Rules
  - b) To deduct, notwithstanding anything from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman and if employer is unable to make such deductions due to his being absent from duty or cessation of employment it may direct the respondent to pay such sums to the aggrieved women.
  - c) Take such other action as the committee may deem appropriate.
- 8.3** The employer shall act upon the recommendation within a period of 60 days from the date of its receipt.

## 9. APPELLATE AUTHORITY

Any person aggrieved by recommendations or non-implementation of recommendation may prefer an appeal to the appellate authority notified under section 2 of the Industrial Employment (Standing Orders) Act, 1946 within 90 days of recommendations.

### Reporting Mechanism


The ICC is required to prepare an annual report and submit the same to the competent authority. The Company is required to include in its report the number of cases filed, if any, and their disposal in the annual report of the Organization.

### False Claims

Dealing with complaints of sexual harassment is a very sensitive matter and any allegations/complaints, however discreetly handled, could prove damaging for the person against whom it has been raised. Baseless allegations should therefore be strictly avoided. In a case where a false complaint has been filed and the investigation has proved that the motivation of the Complainant was purely to defame the respondent, disciplinary action will be initiated against the Complainant and recorded in the personal file of Complainant. The action to be taken will be recommended by the Committee. Action can also be taken against a witness who provided false evidence or produced any forged or misleading document.

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## 10. AWARENESS, COMMUNICATION & EMPLOYER DUTIES

The emphasis of Company's policy against sexual harassment shall be preventive rather than prescriptive. In that vein, the Company will ensure that all of its Employees are aware of and fully understand the tenets and conduct requirements laid out in this policy. The Company shall:

- display at conspicuous locations in the workplace, the penal consequences of sexual harassment; and the order constituting the ICC.
- regularly organize workshops and awareness programmes to sensitize the Employees to the provisions of the Act and orientation programmes for the members of the ICC.
- provide necessary facilities to the ICC to deal with the complaint and conduct an Enquiry.
- assist in securing the attendance of respondent and witnesses before the ICC.
- make available required information to the ICC.
- monitor the timely submission of reports by the ICC.

## 11. CONFIDENTIALITY/PROHIBITION OF PUBLICATION

The contents of the complaint, identity and addresses of the victim, respondent and witnesses, any information relating to inquiry proceedings, recommendations of the ICC, and the action taken by the Company are not to be published, communicated or made known to the public, press and media. However information may be disseminated regarding the justice administered to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to identification of the Victim and witnesses.

**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 or under applicable laws.


### Protection to Complainant

- The Company is committed to ensure 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 victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. Anyone who abuses the procedure will be subject to disciplinary action.

### Statutory Compliance

- The above policy is aimed at complying with the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal Act, 2013).
- The Company reiterates its commitment to provide its employees a workplace free from harassment/ discrimination and where every Employee is treated with dignity and respect.

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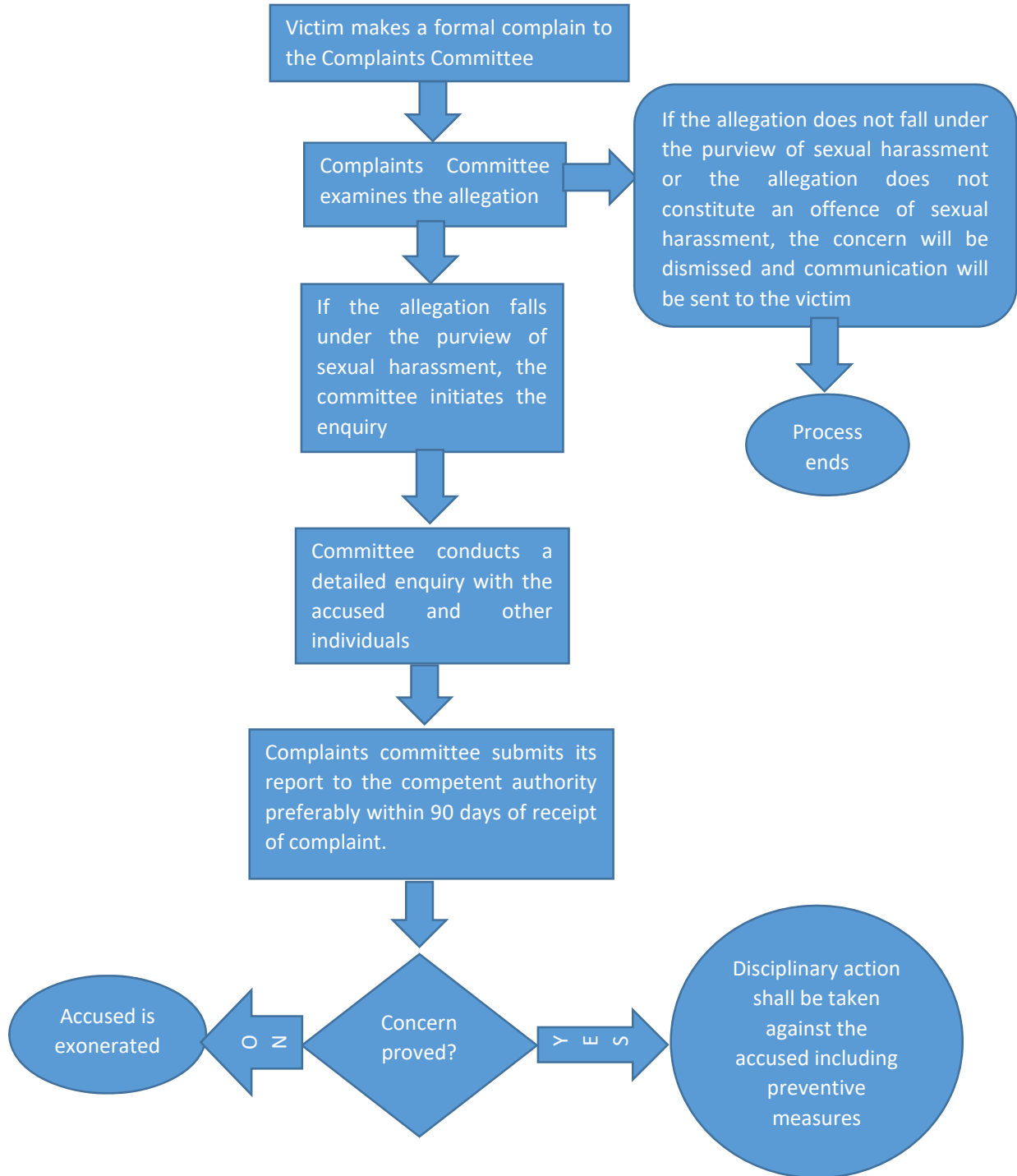
## 12. COMPLIANCE STATEMENT


This policy of the company was originally approved by the Company's Board of Directors on 20<sup>th</sup> June, 2014 for adoption and subsequently reviewed and revised by the Board on 18<sup>th</sup> July, 2023. The contents of this policy shall be appropriately disclosed in the Board Report in accordance with the requirements of the Companies Act, 2013, and rules framed thereunder. Composition of the ICC Committee, this Policy approved by the Board shall be hosted on the website of the Company for public access.

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**ANNEXURE 1**  
**Process Flow chart**



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**ANNEXURE 2  
REDRESSAL FORM**

<b>Date</b>	
<b>Name of Complainant</b>	
<b>Name of Respondent</b>	
<b>Complaint</b>	
<b>Action Initiated</b>	
<b>Investigation Report</b>	
<b>ICC Decision</b>	<b>Date- Summary -</b>

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