

KRITI GROUP

DEALING WITH SEXUAL HARRASSMENT COMPLAINTS POLICY

PURPOSE:

KRITI Group is an equal employment opportunity company and is committed to create and maintain a work environment free of violence, harassment, exploitation, and intimidation. This includes all forms of gender violence, sexual harassment, and discrimination on the basis of sex/gender.


SCOPE:

This policy applies to all employees, including probationers & trainees in staff & workmen category of all companies of KRITI Group which includes Kriti Nutrients Ltd, Kriti Industries (India) Ltd & Kriti Auto & Engineering Plastics Pvt. Ltd, herein after called as "Kriti"

POLICY:

The following acts/ incidents are / shall be constituted as Sexual Harassment:

- i. Unwelcome sexual contacts, advances, demands or requests for sexual favors, and verbal or physical conduct of a sexual nature made implicitly or explicitly;
- ii. Unwelcome sexual advances involving verbal, non-verbal and/or physical conduct such as lewd comments, sexually colored remarks or jokes, letters, phone calls or e-mails, SMSs, gestures, exhibition of pornography, lurid stares, physical contact or molestation, stalking, sounds or display of pictures, signs, verbal, non-verbal, textual, graphic, electronic or any other kind of communication which is of a derogatory nature which has the purpose and/or effect of interfering with an one's performance or of creating an intimidating, hostile, or offensive environment;
- iii. When person/s using, with a sexual purpose, the body or any part of it or any object as an extension of the body in relation to another person without the latter's consent or against that person's;



- iv. Threat made of adverse consequences to a persons physical well-being or employment in case of non-submission to the sexual demands made.
- v. Deliberately creating a hostile or humiliating working environment in a manner that is sexually discriminatory or the person has reasonable grounds to believe that one's objection would disadvantage one in connection with one's employment or work including recruiting or promotion

The incidents / acts set forth herein above are only indicative in nature & do not present an exhaustive list on the subject.

1. Prohibition on Sexual Harassment:

- i. No Employee at KRITI shall sexually harass any other person employed at KRITI;
- ii. Any Employee of KRITI found engaging in sexual harassment practices shall be subjected to appropriate disciplinary action including dismissal from his / her / their services.
- iii. Every Employee at KRITI shall take reasonable steps to prevent Sexual Harassment from being conducted at KRITI and shall also assist KRITI in its efforts against Sexual Harassment.

2. Sexual Harassment Complaints Committee and its Constitution:

- i. Based on the guidelines given in the present policy, a 'Sexual Harassment Complaints Committee' (SHCC) will be set up in KRITI to which any complaint on Sexual Harassment shall be made for its redressal.
- ii. SHCC shall consist of at least 3 (three) members with not less than half of its members being women and shall have a woman chairperson.
- iii. SHCC shall have a third party such as a woman's rights activist(s), social worker(s), activist(s) from a NGO, counselor(s), lawyer(s), doctor(s), trade unionist(s) as one of its members.



3. Dealing With Sexual Harassment Complaints:

- i. All Employees of KRITI are to be provided equal protection through SHCC.
- ii. Procedure for registering a complaint & the mechanism to deal with it will be outlined by SHCC.
- iii. Where Sexual Harassment occurs as a result of an act or omission by any third party or outsider, KRITI shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- iv. In case the SHCC finds the degree of offence coverable under the Indian Penal Code or under any other law, then this fact shall be brought to the attention of the Management of KRITI and appropriate action shall be initiated by KRITI, for making a Police Complaint.
- v. An annual report will be prepared by the SHCC to the Government Department concerned of the complaints and action taken by them.

4. SAFEGUARDS:

- i. KRITI shall ensure that the following persons are not victimized or discriminated against while dealing with complaints of Sexual Harassment and every effort will be made by KRITI to keep their identity confidential:
 - a. Person(s) who has brought investigation under the present policy against any person.
 - b. Person(s) who has alleged that any person has contravened a provision of this Policy
 - c. Person(s) who has otherwise done anything in accordance with this Policy in relation to any person.


A handwritten signature in blue ink, appearing to read 'Pawale', is written over a horizontal line.

5. AWARENESS:

With the aim of ensuring that all employees at KRITI are aware of this policy, KRITI shall issue notifications, publications, circulations and conduct awareness programs for KRITI's employees in English and Hindi

6. AMENDMENTS:

KRITI reserves the right to modify or amend this policy in part or as a whole at any time as it may deem necessary.

Should you have any questions in relation to this Policy, please contact company Compliance Officer or Head, Human Resources at your location.

