



Anti Sexual Harassment Policy

VISION / COMMITMENT

Vardhman Group aims to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and harassment free workplace to all employees.

The Company strives to prohibit any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. The below stated policy therefore intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding Sexual Harassment.

SCOPE:

This policy applies to all categories of employees of the Company, including management and workmen, apprentices and employees on contract at our workplace, premises and precincts. The Policy also extends to those who are not associates of the Company such as customers, visitors etc. but are subjected to sexual harassment at the premises of the Company.

DEFINITION:

Sexual Harassment would mean and include any of the following but not limited to:

- Unwelcome sexual advances involving verbal, non verbal or physical conduct, implicit or explicit. Physical Contact and advances.
- Demand or request for sexual favours.
- Sexually colored remarks, including but not limited to vulgar/indecent jokes, letters, phone calls, text messages, e mails, gestures etc.
- Showing pornography or the likes.
- Any other unwelcome physical, verbal or non verbal conduct of sexual nature.
- Physical contact and advances such as touching, stalking, sounds which have explicit or implicit sexual nature/connotation/overtone in the work area and work related areas.
- Verbal or non Verbal communication which offends the individual's sensibilities and affect her/his performance and has sexual connotation/overtone/nature.
- Teasing, Voyeurism, innuendos and taunts, physical confinement and /or touching against one's will and likely to intrude upon one's privacy.



Vardhman

Delivering Excellence. Since 1965.

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The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential in the employment
- Implied or explicit threat or detrimental treatment in the employment
- Implied or explicit threat about the present or future employment status
- Interference with the work or creating an intimidating or offensive or hostile Work environment
- Humiliating treatment likely to affect health or safety

An alleged act of Sexual Harassment committed during or outside of office hours fall under the purview of this policy.

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

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.

COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time-bound redressal of the complaint made by the victim.

CORRECTIVE ACTION :

It may include any of the following:

- Formal apology
- Counseling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.



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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.

K V Patel

Chief General Manager (Operations)