

## **Harassment, Abuse and Anti-discrimination Policy**

**GEM SUGARS LIMITED** is committed to ensure that their employees are free from harassment, abuse and discrimination. Harassment/Abuse/Discrimination based on an individual's sex, race, creed, colour, national origin, age, religion or any other legally protected characteristics will be strictly prevented in their premises. The management will monitor this policy involving all employees including Regular and Contract workmen and ensures Zero Harassment/No Abuse/No discrimination cases in their premises.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This 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.

As per the Provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, "the employer shall include in its report the number of cases filed, if any, and their disposal under this act in the Annual Report of the Company or where no such report is required to be prepared, intimate such number of cases, if any, to the district officer."

The policy will be implemented and the Company reserves the right to amend, abrogate, modify, rescind / reinstate the entire policy or any part of it at any time

The Committee for Prevention of Sexual Harassment is constituted with the following Directors which will adhere to the following measures:

Mr. R. Sekar, Managing Director  
Mr. Jawaharlal P Doddanavar, Wholetime Director

- 1) This policy is constituted to cover all women employees of Gem Sugars Limited as per the guidelines of The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal Act, Rules 2013).
- 2) The Management will deal with all types of harassment/abuse/discrimination issues, if any.
- 3) The Committee will ensure to prevent harassment/abuse/discrimination issues at their work stations during day to day working.

- 4) The Company will ensure that no harassment/abuse/discrimination will be there at the time of recruitment, fixation of compensation, promotion, termination, etc.
- 5) Treat all complaints in a sensitive, fair, timely and confidential manner.
- 6) No person will be adversely affected in employment as a result of bringing complaints against harassment/abuse/anti-discrimination.

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“Sexual harassment” includes any unwelcome sexually determined behavior (direct or implied) such as physical contact and advances, unwelcome communications or invitations, demand or request for sexual favors, sexually cultured remarks, showing pornography, creating a hostile work environment and any other unwelcome “sexually determined behavior” (physical, verbal or non-verbal conduct) of a sexual nature.

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may also include to all new joiners.

The company is adhered to a policy in line with the requirements of the Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013 pursuant to POSH Act, called the Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Amendment Bill, 2024 (POSH Amendment) was introduced in the Rajya Sabha on February 02, 2024.

## **FILING OF A COMPLAINT**

If any associate believes that (s)/ she has been subjected to sexual harassment, such person may file a complaint with any member of the committee or send an email to [progemsugars@gmail.com](mailto:progemsugars@gmail.com).

## PROCEDURE

1. The Committee member on receiving a complaint will intimate the committee head. The committee head would arrange for a meeting within one week of receipt of the complaint for discussing the complaint raised.
2. Every attempt will be made to get the Complainant to provide the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of witnesses, if any. The complaint shall be signed by the Complainant. Where the aggrieved associate is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint within 3 months of the incident.
3. Committee will ask the complainant to prepare a detailed statement of incidents/allegations. The statement of allegations will be shared with the accused.
4. The accused will be asked to prepare a response to the statement of allegations and submit to the Committee within the given time.
5. The statements and other evidence obtained in the inquiry process will be considered confidential.
6. The Committee will organize verbal hearings with the complainant and the accused. The Committee will take testimonies of other relevant persons and review the evidence wherever necessary. The committee should ensure that sufficient care is taken to avoid any retaliation against the witnesses.
7. During the inquiry process, the complainant and the accused would be expected to refrain from any form of threat, intimidation or influencing of witnesses.
8. The committee will conduct inquiry in accordance with the practices of natural justice, i.e. the Complainant will be offered to the accused for cross-examination and vice versa.
9. The Committee will arrive at a decision after carefully and fairly reviewing the circumstances, evidence and relevant statements.
10. The Committee will ensure confidentiality during the inquiry process and will ensure that in the course of investigating a complaint:
  - i. Both parties will be given reasonable opportunity to be heard along with witnesses and to produce any other relevant documents;

ii. Upon completion of the investigation, both parties will be informed of the results of the investigation.

The committee will be empowered to do all things necessary to ensure a fair hearing of the complaint including all things necessary to ensure that victims or witnesses are neither victimized nor discriminated against while dealing with a complaint of sexual harassment. In this regard the committee will also have the discretion to make appropriate interim recommendations in relation to an accused person (pending the outcome of a complaint) including suspension, transfer, leave, change of work location etc.

The investigation into a complaint will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances.

The committee will investigate and prepare an enquiry report with recommendations within 4 weeks.

#### **DECISION AND ACTION**

Once the investigation is completed, a determination will be made regarding the validity of the harassment allegations. If it is determined that harassment has occurred; prompt, remedial action will be taken.