

Chemetall India Pvt. Ltd.

Policy on Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace

Rev. No. : 06
Effective from : 15th May 2025

INTRODUCTION:

The Central government has passed the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, prescribing procedure for handling such cases. The foregoing policy shall be subject to the provisions of the said Act and Rules framed under the provisions of the said Act and Rules shall prevail if any provisions of the foregoing policy are considered to be in contradiction or contravention of the said Act and Rules.

POLICY:

It is the policy of the Company to scrupulously honour and practice gender equality, equal opportunity to all based on merit alone without any other consideration subject to the Organization's right to make special provisions for safety and security and honour of women as per the principles enshrined in the Constitution.

The Company Policy is to prohibit and prevent sexual harassment of any kind of any employee at the workplace or elsewhere if the same emanates from the association at workplace. The Company shall take necessary action speedily in case any complaint of sexual harassment is received from any employee.

Pursuant to the above, the Company strictly prohibits sexual harassment of any kind by the employees and treat such behavior serious misconduct and without prejudice to other options, reserves the right to terminate the employment of any employee found to be guilty of sexual harassment of any employee.

The Policy is effective from the time it is adopted and published in the Organisation.

The Policy extends to all employees based of the Organisation and is a part of Service Conditions of all employees.

SCOPE OF THE POLICY:

- A) For the purpose of the policy, sexual harassment means and includes the following
1. Any one or more of the following unwelcome act or behaviours, directly or by implication:
 - a) physical contact and advances,
 - b) a demand or request for sexual favours,
 - c) making sexually coloured remarks,
 - d) showing pornography
 - e) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 2. Any one or more of the following circumstances, among other circumstances should these occur or is/are present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment.

- a) implied or explicit promise of preferential treatment to the victim in employment, or
- b) implied or explicit threat of detrimental treatment in employment, or
- c) Implied or explicit threat about present or future employment status, or
- d) Interference with victim's work or creating an intimidating or offensive or hostile work environment for the victim, or
- e) Humiliating treatment likely to affect victim's health or safety.

B) Employee shall mean and include, any person holding employment of any kind under the Company, including those on probation, contract, training, part time work and consultants.

DEALING WITH COMPLAINTS:

The Management shall constitute a committee to receive, consider and address complaints of sexual harassment. The Committee shall have at least three more members. The Committee shall be chaired by a lady selected by the Management from the Employees or from the outside. The Committee shall have at least two more members, at least one of whom shall be a lady.

The Internal Complaint Committee (ICC) may before initiating an inquiry and at the request of the aggrieved woman, take steps to settle the matter between her and the alleged harasser through conciliation, provided that no monetary settlement shall be made as a basis of conciliation. Where a settlement is arrived, no further inquiry shall be conducted by the ICC.

REDRESSAL PROCESS:

1. Any employees who experience or alleges sexual harassment of any kind shall hand over a written and signed complaint to the aforesaid committee within a period of ten days from such occurrence.
2. The Committee shall receive, acknowledge and record the complaint
3. The Committee shall hear the complaint within a week of receiving the complaint and record the allegations. The Committee will also receive and record evidence or documentary proof if any of the incident. The Committee shall investigate the complaint.
4. The Committee shall also give an opportunity to the person against whom the complaint is made to give his/her written explanation within a week. A copy of such statement shall be made available to the complainant.
5. If the complainant or the respondent or both wish to produce witnesses, the Committee shall call such witnesses and examine them.
6. The Committee shall provide all reasonable opportunity to both sides to put forward their respective cases.
7. The Committee shall complete its enquiry within three months and give its findings and recommendations to the Management for necessary action.
8. The conduct of the Committee's examination shall be subject to rules any formed by the Government / Courts / other competent authorities.

OTHER INCIDENTAL MATTERS :

1. The Management shall take all necessary actions and provide all necessary support for effective implementation of this Policy.
2. The Management shall take appropriate action against the respondent or if the complaint is found to be baseless, against the complainant on receipt of the Committee's recommendations.
3. If the Committee finds that the offence complained of is covered by the Indian Penal Code, the Management shall take appropriate action to make a Police complaint.

THE FIRST INTERNAL COMPLAINT COMMITTEE:

The first internal Complaint Committee constituted is as follows:

Chairperson: Ms. Shobha Popalghat (the tenure of the Chairperson is 3 years from the date of the appointment. Her appointment as chairperson is effective 14th Feb 2023 and will get over by 28th Feb 2026)

Members:

1. Divya Murali
2. Santosh Kulthe
3. Adv. Deepak Patwardhan (External nominee familiar with issues relating to Sexual harassment)
4. Satheesh K

Internal Complaint Committee will also cater other locations in India including Chennai Plant and other Regional / sales Offices too.

The Committee will meet once in a quarter or otherwise upon reporting of any issue pertaining to Sexual Harassment.



Anmol Rao
Managing Director

Chemetall India Pvt. Ltd.

Date: 15th May 2025

C I R C U L A R

This is to inform you that The Central government has passed the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. This act provides protection against sexual harassment of Women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

Since it's a statutory requirement to abide by the law, we have also formed a policy on Sexual Harassment of Women at Workplace and formed a committee as below which will look into related matters in this regard.

Members of the IC Committee for Pune factory Site (Koregaon Bhima), Pune City Office at Viman Nagar, Any Regional Sales office at Pan India:

Name	Role	Contact Number	Email ID
1. Ms. Shobha Popalghat	Chairperson	9075754994	shobha.popalghat@basf.com
2. Ms. Divya Murali	Member	9920375258	divya.murali@basf.com
3. Mr. Santosh Kulthe	Member	9850047975	santosh.kulthe@basf.com
4. Adv. Deepak Patwardhan	External Member	9822042038	deepaklawyer@gmail.com
5. Mr. Satheesh K	Member	9962159381	satheesh.k@basf.com

Members of the IC Committee for Chennai & Adjacent Locations:

Name	Role	Contact Number	Email ID
1. Ms. Shobha Popalghat	Chairperson	9075754994	shobha.popalghat@basf.com
2. Ms. Divya Murali	Member	9920375258	divya.murali@basf.com
3. Mr. Santosh Kulthe	Member	9850047975	santosh.kulthe@basf.com
4. Adv. Deepak Patwardhan	External Member	9822042038	deepaklawyer@gmail.com
5. Mr. Satheesh K	Member	9962159381	satheesh.k@basf.com

Above members can be contacted in case of related issues pertaining to Sexual Harassment of Women at Workplace.

Please find the attached policy as above.

For Chemetall India Pvt. Ltd.



Anmol Rao
Managing Director