

SETHIA OILS LIMITED

DIAMOND HERITAGE, ROOM NO.505
16, STRAND ROAD, KOLKATA – 700001

Policy on Prevention of Sexual Harassment (POSH) Of Women at Workplace

1. Introduction

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). While the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

2. Scope

Our organisation aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee or stakeholders during their association with the company towards any other person being an internal and external stakeholder of the company in India or abroad.

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at activity locations. It also applies to any personnel at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the 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.

The workplace includes:

- All offices or other premises where the company’s work and/or activities/projects/programmes are conducted.
- All Our organisation-related activities performed at any other site away from the Our organization’s premises.

3. Complaint Process

Whether or not such conduct constitutes an offence under law and a breach of the employment rules, 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 complainant.

Our organization will ensure that any Complainant will not suffer adverse consequences as a result of any complaint being made.

4. Complaints Committee:

The Company shall form an Internal Complaints Committee for redressal (Henceforth Known as “Committee”) of harassment complaints and for ensuring time bound treatment and resolution of such complaints.

The Internal Complaints Committee will comprise of the following four members:

- Chairperson (Presiding Officer) – Woman
- Member – Employee
- Member – Employee
- Member – a person from NGO / social worker / person having knowledge of sexual harassment issues.

The Internal Complaints Committee shall be responsible for:

- Receiving complaints of sexual harassment
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the chairperson and/or board of directors of our organisation in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting annual reports in the prescribed format

5. Procedures For Resolution, Settlement of Acts of Harassment:

The Company is committed to providing a supportive environment in which to resolve concerns of harassment as under:

A. Procedure for Informal Resolution of the Grievances:

When an incident of harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request the harasser to desist from such conduct in the future.

If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, she can bring the concern to the attention of the Complaints Committee for redressal of grievances.

The Complaints Committee will thereafter provide advice or extend support as requested and will do the needful to resolve the matter.

It is advisable that the victim keeps a record of incident i.e. date, place, possible witness and file a complaint as soon as possible.

B. Procedure for Formal Resolution of the Grievances:

- The complaint should be submitted in writing for it to be considered as formal and for the committee to probe and take necessary actions. The victim may submit the complaint in the form of a written letter, duly signed by the victim and submitted in a sealed envelope to the Chairperson/Member of Committee.
- If any complaints are received by any of the members of the Committee, the member is obliged to bring it to the notice of the Chairperson within three working days from the date of receipt of the complaint.
- The Committee should meet within 10 working days from the date of receipt of the complaint by the Chairperson to decide on the proceedings and the course of the investigation.
- Once the complaint is received by the Internal Complaints Committee, the alleged accused should be informed regarding the complaint. It should also be made clear that no act of retaliation or unethical action by the accused shall be tolerated and that the accused should extend full support during the investigation of the case.
- The Internal Complainants Committee shall ensure that a fair and just investigation is undertaken immediately.
- Both the victim and the alleged accused will be questioned separately by the Internal Complaints Committee with a view to ascertain the authenticity of their contentions.
- The investigation shall be completed within 90 days of the receipt of the complaint. If the investigation reveals that the victim has been sexually harassed as claimed, the accused will be disciplined accordingly. Disciplinary action may include any of the following:
 - Counselling
 - Warning
 - Apology to be tendered by the respondent
 - Withholding promotions and/or increments

- Bond of good behavior
 - Written warning
 - Suspension
 - Police Complaint
 - Or any other action that the management may deem fit
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Internal Complaint Committee.
 - Any party not satisfied or further aggrieved by the implementation or non implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated.

6. 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 any investigatory process to the extent practicable and appropriate under the circumstances.

7. 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.

8. Protection to complainant/victim

The company is committed to ensuring that no employee, associate or stakeholder 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. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

9. Complaints made with a malicious intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees, associates and stakeholders have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

The Committee may also take suo moto action, if any incident of harassment is brought to its attention, without any formal complaint being made in this regard.

10. Responsibility of employees, volunteers, stakeholders and associates regarding sexual harassment

All employees, volunteers, stakeholders and associates of the company have a personal responsibility to ensure that their behavior is not contrary to this policy. This policy is deemed to be a part of the terms of employment of every employee of the organization. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

11. Conclusion

In conclusion, the company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.