



Policy on prevention of sexual harassment at the workplace

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Version	3
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1. Purpose

- i) define sexual harassment as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (referred to as Act hereinafter)
- ii) provide an effective complaint and redressal mechanism in case of a reported behaviour that is in line with the definition of sexual harassment at workplace

2. Scope

All team members including ETs, MTs, consultants, apprentices, interns, secondary | contract of Atul and its subsidiary, associate and joint venture entities.

In addition to this, the scope of sexual harassment will include 'Third Party Harassment'.

3. Definitions

3.1. Sexual harassment:

3.1.1. As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, "sexual harassment" includes any (but not limited to) one or more of the following acts or behaviour (whether directly or by implication) namely:

- i) physical contact and advances,
- ii) a demand or request for sexual favours,
- iii) making sexually coloured remarks,
- iv) showing pornography, or
- v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature

3.1.2. Further the following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act of behaviour of sexual harassment:

- i) implied or explicit promise of preferential treatment of her employment,
- ii) implied or explicit threat of detrimental treatment of her employment,
- iii) implied or explicit threat about her present and future employment status,
- iv) interfering with her work and creating an intimidating or offensive or hostile work environment for her, or
- v) humiliating treatment likely to affect her health and safety

3.2. **Workplace:** As mentioned in the Act and this policy, "workplace" is, in addition to the place of work (offices and plant sites) shall include any place where the aggrieved team member or the respondent visits, in connection with her | his work, during the course of and | or arising out of employment | contract | engagement with Atul and its subsidiary, associate and joint venture entities, including transportation provided for undertaking such a journey.

3.3. **Team member:** For the purpose of this policy, the term "team member" refers to any person on the rolls of any of Atul and its subsidiary, associate and joint venture entities within India. It also includes people who work as honorary, temporary, or part-time team members, regardless of title. It would also include people hired on a contract basis, for project-based work, or through any third-party service providers. This broad definition of 'team member' used for the purpose of this policy cannot be used to claim rights of a team member conferred by any other law | policy, and is only for the purpose of interpretation and execution of the policy on prevention of sexual harassment at workplace.

3.4. **Aggrieved:** An individual of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by a team member of Atul and its subsidiary, associate and joint venture entities (the Company) or any third party associated with the Company thereby.

- 3.5. **Complainant:** Refers to any individual covered under the scope of this policy, who has lodged a complaint of sexual harassment at the workplace.
- 3.6. **Respondent:** Refers to any individual covered under the scope of this policy against whom the complaint for sexual harassment has been lodged by the complainant.
- 3.7. **Evidence(s):** All oral testimony of witnesses, documents, Company records, objects, photographs, audio and | or video tapes and depositions relevant to the charges of sexual harassment filed by the aggrieved team member.
- 3.8. **Internal Complaints Committee (ICC):** A committee formed under this policy via an office order, as per the guidelines mentioned in the Act pertaining to composition of ICC, responsible to investigate complaints of sexual harassment that are referred to it, and makes appropriate recommendations to the Management of Atul and its subsidiary, associate and joint venture entities.
- 3.9. **Third Party Harassment** is where sexual harassment occurs by a third party (not a team member of the Company) for example, a client, a vendor or any other person that the team member is interacting with, for work purposes.

4. Responsibility

4.1. Atul and its subsidiary, associate and joint venture entities:

- 4.1.1. Provide a safe working environment and conditions at workplace to all team members, including secondary workmen.
- 4.1.2. Organise workshops and awareness programs at regular intervals (at least once in a financial year) with an objective to sensitise the team members with the Policy and the clauses covered under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013; also organise orientation programs and workshops for the members of the Internal Complaints Committee (herein after referred as Internal Committee as per the guidelines of the Act).
- 4.1.3. Display the penal consequences of sexual harassment at the workplace, at identified, noticeable areas in the workplace across all its locations (office and manufacturing sites).
- 4.1.4. Constitute an Internal Committee through a written order and its constitution should be as per the guidelines of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and provide an effective complaint and redressal mechanism to the aggrieved person and treat all the cases reported as a violation of the Policy, and handled with utmost confidentiality.
- 4.1.5. Mandatorily disclose the number of sexual harassment cases filed and disposed of, during any given financial year, in the Company's annual report.
- 4.2. It shall be the responsibility of **every team member** as mentioned under the scope of the Policy, that no person shall cause sexual harassment of any woman at the workplace.
Please refer to [Annexure III: Guidelines for sustaining a women-friendly work culture at Atul](#).
- 4.3. **Manager L&D | EC (Human Resources)** shall be responsible for the overall effective administration of the Act, its rules and the Policy.

5. Policy statement:

Atul and its subsidiary, associate and joint venture entities are committed to providing a safe environment for all its team members, free from discrimination on any ground, and from harassment at work including sexual harassment. The Management of the Company will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents

seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action up to, and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

6. Complaint mechanism and procedure:

6.1. Step 1: Identifying and lodging an official complaint

- 6.1.1. Once the aggrieved team member has identified an act | behaviour which is in line with the definition of sexual harassment as mentioned under this policy, they may then submit a detailed complaint, along with any documentary evidence available, or names of witnesses, to the Secretary of the Internal and also mark an e-mail to icc@atul.co.in.
- 6.1.2. The complaint must be lodged within three months from the date of the incident | last incident. The ICC can extend the timeline by another three months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.
- 6.1.3. All timelines, as per the Act has been attached as [Annexure I: Timelines as per the Sexual Harassment of Women at Workplace \(Prevention, Prohibition and Redressal\) Act, 2013](#) for ready reference and adherence.
- 6.1.4. In cases where such a complaint cannot be made in writing, the Presiding officer of ICC or any Member of the ICC shall render all reasonable assistance to the aggrieved team member for making the complaint in writing.
- 6.1.5. If the aggrieved team member is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her | his written consent:
 - i) Legal heir, relative or friend
 - ii) Co-worker
 - iii) Any such individual having the knowledge of the incident
- 6.1.6. If the initial complaint is made to a person other than ICC member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

6.2. Step 2: Pre-investigation

- 6.2.1. Once the complaint is received, before initiating an official inquiry, the ICC, only at the request and agreement of the aggrieved team member, may take steps to conciliate the complaint between the aggrieved team member and the respondent. In addition, no monetary settlement shall be made on the basis of such conciliation. In case if both parties, i.e., the complainant and the respondent, arrive at a mutual conciliation, no further inquiry shall be conducted by the ICC and other concerned authorities of the Company.
- 6.2.2. In case of a mutually consented settlement of the issue, the ICC will be responsible to record the statement of conciliation between the aggrieved team member and the respondent and forward the same to the Executive Vice President - Human Resources, and the Management, to initiate actions as recommended by the ICC in its report. The Secretary of ICC shall provide copies of the settlement as recorded, to the aggrieved woman and the respondent.

6.3. Rights of the aggrieved team member | complainant:

The aggrieved team member, during the course of investigation process carried out by ICC, reserves the right to:

- 6.3.1. Transfer of either self or the respondent to another workplace
- 6.3.2. Leave of up to a period of three months. The leave granted to the aggrieved woman under this section shall be in addition to the leave she will be entitled to otherwise
- 6.3.3. Restriction of the respondent from reporting on the work performance of the aggrieved team member or writing a confidential report and assigning the same to another officer
- 6.3.4. Confidentiality of identity throughout the process
- 6.3.5. Legal assistance from the Company
- 6.3.6. Appeal in case not satisfied with the recommendations | findings of the ICC

6.4. Rights of the respondent:

The respondent, during the course of investigation process carried out by ICC, reserves the right to:

- 6.4.1. A patient, non-biased hearing to present his case
- 6.4.2. A copy of the statement along with all the evidence and the list of witnesses submitted by the complainant
- 6.4.3. Confidentiality of identity throughout the process
- 6.4.4. Appeal if in case not satisfied with the recommendations | findings of the ICC

6.5. Step 3: Investigation by the Internal Complaints Committee (ICC)

6.5.1. Conducting inquiry:

The ICC initiates inquiry in the following cases:

- i) No conciliation is requested by the aggrieved team member
- ii) Conciliation has not resulted in any settlement
- iii) Complainant informs the ICC that any term or condition of the settlement arrived through conciliation, has not been complied with, by the respondent

The ICC proceeds to make an inquiry into the complaint within a period of one week of its receipt of the original complaint | closure of conciliation | repeat complaint.

6.5.2. Manner of inquiry into the complaint:

- i) Complainant should submit the complaint along with the supporting documents and the names of the witnesses.
- ii) Upon receipt of the complaint, the committee sends one copy of the complaint to the respondent within seven working days.
- iii) Respondent replies with all supporting documents within 10 working days of receiving the copy of the complaint.
- iv) No legal practitioner can represent any party at any stage of the inquiry procedure.
- v) The ICC makes inquiry into the complaint in accordance with the principles of natural justice.
- vi) In conducting the inquiry, a minimum of three committee members including the Presiding Officer of ICC must be present.

6.6. Termination of inquiry:

ICC at Atul and its subsidiary, associate and joint venture entities may terminate the inquiry or give an ex-parte decision, if the complainant or respondent respectively is absent for three consecutive hearings, without reason. A written notice is to be given to the party, 15 days before termination or the ex-parte order.

6.7. Inquiry procedure:

- 6.7.1. All proceedings of the inquiry are documented. The ICC interviews the respondent separately and impartially.
- 6.7.2. The ICC states exactly who has made the allegation and what it is. The respondent is given the opportunity to respond and provide evidence (definition stated in 3.7).
- 6.7.3. Detailed notes of all the meetings are prepared, which may, upon request, be shared with the respondent and the complainant along with other members of the ICC. Any witnesses produced by the respondent are also interviewed and their statements are recorded.
- 6.7.4. If the complainant or respondent desires to cross-examine any witnesses, the ICC facilitates the same and records the statements.
- 6.7.5. In case the complainant or respondent seeks to ask questions to the other party, they may give them to the ICC. ICC asks them these questions and records the statement of the other party.
- 6.7.6. Completion of such inquiry and submission of its report shall be done within 90 days from the date of commencement of the inquiry. The inquiry procedure ensures absolute fairness to all parties involved.

6.8. Step 4: Report of the final order by ICC:

- 6.8.1. Post the inquiry, the ICC must submit its report containing the findings and recommendations to the Executive Vice President HR and the Management of Atul Ltd and its Group companies within 10 days of completion of the inquiry.
- 6.8.2. The ICC must ensure that the findings and recommendations are reached from the facts established and is recorded accurately.
- 6.8.3. If the situation so requires, or upon request of the complainant, respondent or witness, Management at Atul Ltd and its Group companies may decide to take interim measures such as transfer, changing of shift, grant of leave etc to protect against victimisation or distress during or subsequent to the course of inquiry, pending the final outcome.

6.9. Considerations while preparing the inquiry report:

While preparing the findings | recommendations, the following guidelines must be considered:

- 6.9.1. Whether the language used (written or spoken), visual material or physical behaviour was of sexual or derogatory nature
- 6.9.2. Whether the allegations or events follow logically and reasonably from the evidence
- 6.9.3. Credibility of complainant, respondent, witnesses and evidence
- 6.9.4. Other similar facts, evidence, for example, if there have been any previous accounts of harassment pertaining to the respondent
- 6.9.5. Both parties have been given an opportunity of being heard
- 6.9.6. A copy of the proceedings were made available to both parties enabling them to make representations against the findings

6.10. Step 5: Action to be taken post inquiry:

Once the report of final order is submitted by the ICC to Executive Vice President - Human Resources and the Management of Atul Ltd and its Group companies, Executive Vice President - Human Resources in consultation with the Management will initiate appropriate actions, based on recommendations and suggestions of the ICC, against the respondent team member.

6.11. Complaint unsubstantiated:

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the Company.

6.12. Complaint substantiated:

6.12.1. Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include, but not limited to the following:

- i) Counselling
- ii) Censure or reprimand
- iii) Apology to be tendered by the respondent
- iv) Written warning
- v) Withholding promotion and | or increments
- vi) Suspension or immediate termination from all capacity with Atul Ltd and its Group companies
- vii) Any other action that the Management of Atul Ltd and its Group companies may deem fit based on the recommendations and suggestions of ICC

6.12.2. Executive Vice President - Human Resources and the Management of the Company will act upon the recommendations of the ICC within 60 days and confirm to the ICC in written of the actions initiated.

6.13. Malicious Allegations:

6.13.1. Where the ICC arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved team member or any other person making the complaint has made the complaint knowing it to be false or the aggrieved team member or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint.

6.13.2. The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints.

6.13.3. While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

6.14. Confidentiality:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the Act.

6.15. Appeal:

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.

Inquiry process at a glance has been attached as [Annexure II: Inquiry process at a glance](#) for ready reference and adherence.

7. **Policy amendments and authorisation**

The above policy guidelines are subject to review and modification from time to time at the discretion of the Management. The decision of the Head – Human Resources shall be final and conclusive in the event of an interpretation of a guideline mentioned in the policy.

8. **Policy change history**

Version	Review date	Description of changes made
1	December 09, 2013	Introduction of the policy
2	August 01, 2018	Overall revision in the Policy
3	March 31, 2024	Change in document format

Annexure I

Timelines as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

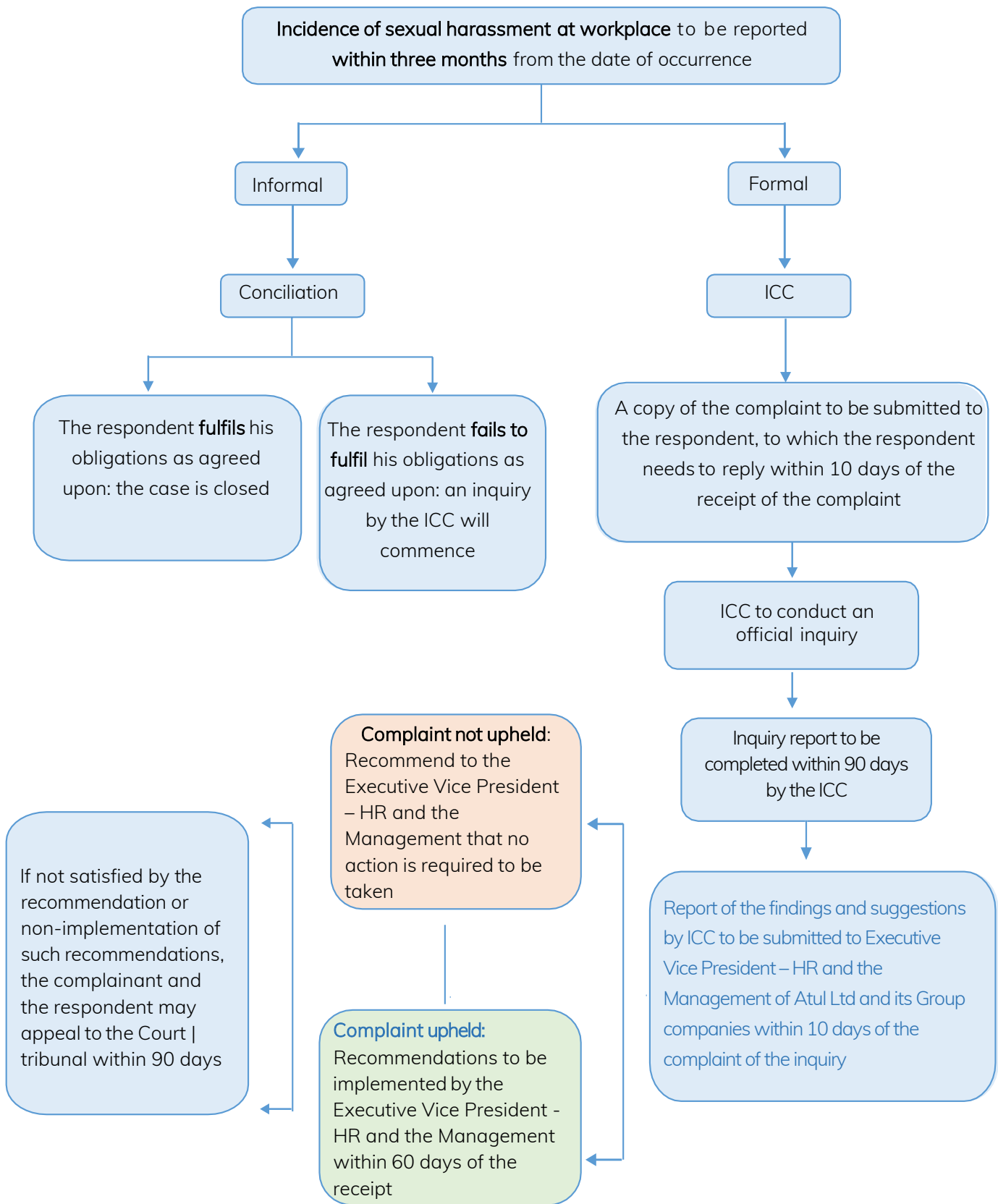
Particulars	Timeline
Submission of Complaint	Within 3 months of the last incident
Notice to the Respondent	Within 7 days of receiving copy of the complaint
Completion of Inquiry	Within 90 days from the date of receipt of the complaint
Submission of Report by ICC ¹	Within 10 days of completion of the inquiry
Implementation of recommendations	Within 60 days of the date of submission of ICC's Report
Appeal (if any) by parties ²	Within 90 days of the recommendations

¹Internal Complaints Committee

²Complainant and Respondent

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Annexure II Inquiry process at a glance



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Annexure III: Guidelines for sustaining a women-friendly work culture at Atul

1. Guidelines for the Reporting Manager (L+1) of a female team member:

When a female team member is staying back at work beyond normal working hours:

- i) Unless essential, it is suggested that the female team member must not be asked to stay back at workplace after sunset or work on non-working days.
- ii) In case if a women team member is staying back post normal working hours, L+1 to ensure that they are dropped home in Company transport, if needed.
- iii) In case if transport is not available, L+1 to offer accommodation in Guest House, if needed.

2. Other guidelines:

- i) Seating arrangement of a female team member must be such that she is facing the main door of the cabin | office.
- ii) In case if a female team member approaches the L+1 with a complaint related to harassment of any nature, it will be the L+1's responsibility to escalate the complaint to Manager – L&D EC (Human Resources) and adhere to the guidelines mentioned under (5.2) of the Policy on prevention of sexual harassment at workplace.

3. Guidelines for female team member:

Do	Don'ts
1. Keep mobile numbers of at least three colleagues from the same Bu Fu including the respective Bu Fu HR manager to whom you can contact in an event of an emergency	1. Do not ignore an inappropriate behaviour by a male colleague support staff. Report immediately any such instance to your L+1 HR and (or) ICC (as deemed to be appropriate)
2. While staying in office Plant, outside of normal working hours, you must inform your L+1. Also, please inform the Main Security Gate that you will be working late so that security rounds are ensured. Contact details of Site Security offices are as mentioned below: <ul style="list-style-type: none"> • East Site (including Corporate): 5254 • North Site: 3561 • West Site: 4300 • Ankleshwar: 6168 • Dadar and Goregaon: (+91) 93242 78028 Please note: while making a call from a mobile phone, please dial (02632) 230000 and then dial the respective extension numbers mentioned above.	2. Do not encourage male colleagues to visit your residence (in case you are staying in a Company-provided accommodation) or visit residence of male colleagues who are staying alone. It is best to socialise in public places such as parks, clubs etc.

3. While availing unit-provided transport facility post normal working hours:
- be alert to any change in the usual route to your residence
 - always sit on the rear seat of the vehicle
 - if you suspect that the driver is under the influence of alcohol or any other form of intoxication, refuse to board the vehicle and inform the transport department and your respective Bu | Fu HR immediately

3. Do not hesitate to highlight an incident or the behaviour which is in line with the definition of 'harassment' under the Act.

Please report such incident | behaviour through a detailed written complaint, along with any documentary evidence available or names of witnesses, to the Secretary of the Internal Complaints Committee and also mark an e-mail to a designated e-mail address: icc@atul.co.in

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