

**GSL NOVA PETROCHEMICALS
LIMITED**

**SEXUAL HARASSMENT OF WOMEN
AT THE WORKPLACE (PREVENTION,
PROHIBITION AND REDRESSAL) &
ELIMINATION OF CHILD LABOUR
POLICY**

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Under the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013, [hereinafter referred to as “Act”]

Objective:

It is the endeavor of GSL NOVA PETROCHEMICALS LIMITED, to ensure a safe, secure and congenial work environment where employees and workers will deliver their best without any inhibition, threat or fear. In pursuance of this objective, the GSL NOVA PETROCHEMICALS Limited has evolved a “Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Policy”.

The approach adopted by the GSL NOVA PETROCHEMICALS LIMITED is to spread awareness about the causes and consequences of sexual harassment at workplace and thereby prevent any occurrences. In the event of such an occurrence, the Group would use this Policy to provide the framework for action.

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy:

Sexual harassment in the work place has been defined as “unwelcome” sexually determined behavior (whether directly or by implication). It includes any or all of the following:

- Physical contact and advances
- A demand or request for sexual favours
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
- Sexual harassment will be deemed to have taken place if work is used as the excuse or occasion for repeated, personalized, offensive and unwelcome speech or gestures.

It is the duty of the Organization to prevent or deter acts of sexual harassment and if they take place, to provide procedure for resolution, encourage counseling, settlement or prosecution of acts of sexual harassment;

- Where the conduct of the employee would constitute an offence under

the Indian Penal Code or any other law, the GSL NOVA PETROCHEMICALS LIMITED shall initiate legal action

- Where the conduct would in addition to an offence under law, constitute misconduct under the rules or regulations of the organization, GSL NOVA PETROCHEMICALS LIMITED shall initiate disciplinary action against him/her.

The concerns of or about employees can be reported without fear of reprisal or retaliation. Any allegations of sexual harassment will be investigated quickly and discreetly, and disciplinary action initiated as described in this policy. To the extent possible, the identity of the complainant, the victim, witnesses and the alleged harasser will be protected against unnecessary disclosure. All efforts will be made to ensure that proceedings remain confidential.

Redressal Mechanisms:

If an employee experiences or witnesses sexual harassment in the workplace, she/he should report to the respective Head of Department (HOD)/Internal Complaints Committee (constituted/to be constituted as per the Act) of the Company through one of the following channels.

1. The employee can verbally inform, followed by a written statement
2. The employee can write to the HOD/Internal Complaints Committee on his/her official email ID.

Any complaint received by the HOD/Internal Complaints Committee, shall be dealt with as per provisions of the Act.

In addition to any incidents that take place in the GSL NOVA PETROCHEMICALS LIMITED group workplaces, employees will also be assisted in dealing with third party harassment.

In the event of a complaint being received, the HOD/Internal Complaints Committee shall investigate the issue immediately and prepare a report at the end of the investigation. For the purpose of investigation, the HOD/Internal Complaints Committee is entitled to elicit all forms of evidence, including access to written communication, witnesses and previous records. All employees shall co-operate with the HOD/Internal Complaints Committee in this regard. Both the complainant and the accused will be given the opportunity to present their views to the HOD/Internal Complaints Committee and all principles of natural justice shall be

followed. The final report with timelines will be presented to the Board of the GSL NOVA PETROCHEMICALS Limited. The HOD/Internal Complaints Committee should submit the report no later than one month from the receipt of the complaint.

Disciplinary action:

Disciplinary action will be initiated by the Company, based on the recommendations of the HOD/Internal Complaints Committee, within 5 working days of the receipt of the report.

If the employee is found guilty of Sexual Harassment as defined in the policy, any of the following actions, as recommended by the HOD/Internal Complaints Committee, can be initiated:

1. Official written warning which will be entered in the service record of the employee/perpetrator
2. Transfer of the perpetrator
3. Termination of employment of the perpetrator
4. Criminal proceedings will be initiated if warranted

In the event the HOD/Internal Complaints Committee finds that the complaint is false, it will recommend further action. This may be to determine if the false complaint was mal-intended or frivolous. Based on the findings thereof, any or all of the above actions can be taken against the employee making such a complaint.

If the complainant wants to be transferred to another centre, the employer shall assist to the extent possible.

Strategy for Communication of Policy:

- (a) Policy affirmation: Policy shall be communicated to all employees and workers and they shall adhere to it.
- (b) Orientation and training of all employees on the Policy on Sexual Harassment.
- (c) Setting up and capacity building of the HOD/Internal Complaints Committee on Sexual Harassment at Workplace (Prevention and Redressal). The HOD/Internal Complaints Committee will evolve a process to be followed from receipt of complaint till preparation of the final report.
- (d) The HOD/Internal Complaints Committee will meet twice a year to review the situation, plan awareness programs, and discuss related issues.

- (e) Middle Managers will be responsible for ensuring a harassment-free and congenial environment of mutual trust among employees.
- (f) Constant reinforcement of the policy shall be ensured by discussions about these issues by top management and staff in various appropriate forums.

Policy on elimination of child labour:

The Company's policy is not to support child labour. The Company is committed to implementing the provisions of the Child labour (Prohibition and Regulation) Act, 1986. The Company is aware of social reality of the existence of child labour and recognizes that this evil cannot be eradicated by simply setting up rules or inspections. Towards this end, the Company is committed to work in a pro-active manner to eradicate child labour by actively contributing to the improvement of children's social situation. As part of its efforts to eliminate the evil of child labour, the Company encourages the employment of the parents of such children to secure the existence of the family and the education of the children. The Company supports the use of legitimate workplace apprenticeship, internship and other similar programs that comply with all laws and regulations applicable to such programs.