



**POLICY UNDER THE PROVISIONS OF THE SEXUAL HARASSMENT OF  
WOMEN AT WORKPLACE ( PREVENTION, PROHIBITION AND REDRESSAL)  
ACT, 2013 ("POSH")**

**(REVISED & IMPLEMENTED W.E.F. 27.10.2023)**





## 1. INTRODUCTION:

Supreme Petrochem Limited ((hereinafter referred to as "SPL" or "the Company")) is committed to establishing and upholding a workplace environment where our employees can collaborate without the threat of sexual harassment, exploitation, or intimidation. SPL believes that Sexual harassment at the Workplace results in violation of the fundamental rights of a woman and the Company has zero tolerance towards any such act of Sexual harassment.

Sexual harassment results in violation of the fundamental rights of a woman to equality under Articles 14, 15 and 21 her rights to Life and Personal Liberty under of the Constitution of India and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from Sexual harassment.

The 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 referred to as "POSH" or "Act"). Accordingly, While the policy covers all the aspects of the Act, for any further clarification reference shall always be made to the Act and the Provisions of the Act shall prevail. In case of any conflict between the policy and the law, the law will prevail.

This policy provides protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

## 2. SCOPE

This policy extends to all categories of employees of the Company, more particularly as defined in Clause 3.3 stated hereinafter.

## 3. DEFINITIONS

3.1 **Sexual harassment** may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals within the course of his/her work who is not employed by the Company.

"Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but not limited to:

- a. Physical contact and advances; or
- b. A demand or request for sexual favours; or
- c. Making sexually coloured remarks; or
- d. Showing pornography.
- e. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

3.2 The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment, as defined in (3.1) above, may amount to sexual harassment: —

- I. Implied or explicit promise of preferential treatment in her employment; or
- II. Implied or explicit threat of detrimental treatment in her employment; or
- III. Implied or explicit threat about her present or future employment status; or
- IV. Interference with her work or creating an intimidating or offensive or hostile work environment for her;
- V. Humiliating treatment likely to affect health or safety.





: 2 :

- 3.3 Employee / Aggrieved Person: In relation to a workplace, a person employed at the workplace for any work on regular/temporary/ad- hoc daily wage basis, either directly or through an agent, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes a contract worker, probationer, trainee, apprentice working for Company, who alleges to have been subjected to any sexual harassment by the respondent.
- 3.4 Respondent: A person against whom a complain of sexual harassment has been made by the aggrieved person.
- 3.5 Employer: A person responsible for management, supervision, and control of the workplace.
- 3.6 Workplace: All offices, factories, units, or any place visited by the aggrieved person or the employee during and/or arising out of employment/contract/engagement with SPL including transportation provided for undertaking such a journey.

#### 4. ROLES AND RESPONSIBILITIES

Every employee within the Company carries a personal obligation to uphold this policy. It is the duty of all individuals to honour the rights of others and never endorse any form of harassment. It's important to recognize that some behaviours may occur unintentionally. While this doesn't excuse such behaviour, it provides an opportunity for individuals engaging in inappropriate conduct to amend or cease their offensive actions.

Requisite provisions should be made in Company so that no one within the organization is subjected to harassment and that equal treatment is maintained and all employees should be aware of the following:

- Harassment is absolutely not tolerated.
- Complaints will be treated with the utmost seriousness.
- Individuals making complaints, those against whom complaints are made, or any witnesses will not face any form of victimization.

#### 5. INTERNAL COMMITTEE (IC)

The Internal Committee (IC) of the Company has been re-constituted on July 23, 2025 under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (POSH Act). Accordingly, the composition of IC is comprised of following members: -

Sr. No.	NAME OF THE COMMITTEE MEMBERS	CATEGORY
1.	Ms. Isha Raina	Presiding Officer/Chairperson
2.	Ms. Jean Bhandary	Member/Deputy Chairperson
3.	Mr. D.N. Mishra	Member
4.	Mr. R. P. Shinde	Member
5.	Ms. Jyotsna Datar	External Member

The External Member shall be paid such fees or allowances for attending the proceedings of the IC, as may be prescribed under the Act.





: 3 :

This ICC will deal with the matters within the purview of this policy across all the locations of SPL.  
Members of the ICC will hold office for a period of 3 years from the date of their nomination.

## 6. COMPLAINT RESOLUTION PROCEDURES:

### 6.1 INFORMAL RESOLUTION OPTIONS:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

### 6.2. FORMAL RESOLUTION OPTIONS:

- a. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a duly signed letter, submitted within 3 months from the date of the incident and in case of a series of incidents, within a period of 3 months from the date of the last incident. However, the ICC may grant extension of not more than 3 months if it is satisfied that specific circumstances were such which prevented the female employee from filing complaint within aforesaid 3 months period. Alternately, the employee can send written complaint to the email Id: [icc@spl.co.in](mailto:icc@spl.co.in). The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.
- b. Internal Complaints Committee on receipt of such written complaint, may, if require ask the aggrieved person to furnish additional information about the alleged harassment. The ICC will proceed to determine whether the allegation(s) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual harassment, or the allegation does not constitute an offence of Sexual Harassment, the ICC will record this finding with reasons, and communicate the same to the complainant.
- c. Where the aggrieved woman is unable to make a complaint on account of her physical/mental capacity or death or otherwise, her legal heirs can lodge complaint as per the provisions of POSH.
- d. The Committee may, before initiating an inquiry and at the request of the aggrieved employee, take steps to settle the matter between the aggrieved and the respondent through conciliation, provided that no monetary settlement shall be made as a basis of such conciliation in writing. Such conciliation should be completed within one month from the date of making the complaint. In case settlement is arrived no further inquiry shall be conducted by the ICC.
- e. If the Presiding Officer of the Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Committee.
- f. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.





: 4 :

- g. The ICC shall conduct and complete such inquiry/investigation in a timely manner not exceeding 90 days from the date of receiving complaint and shall submit a written report containing the findings and recommendations to the Employer as soon as practically possible and in any case, not later than 10 days from the date of completion of inquiry. The Employer shall act upon the ICC recommendation within 60 days of its receipt.
- h. ICC in separate meetings with the aggrieved woman employee and the alleged harasser will record and investigate into the statements given by them. In addition, ICC has right to ask for any witness/documents/records etc. as are relevant to the case, during the inquiry.
- i. The Committee's final report will also be made available to concerned parties.
- j. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- k. The place of hearing w.r.t. any complaint under POSH shall be held by ICC at the SPL location where the complainant was already harassed.

**7. DISCIPLINARY ACTION:**

Once the ICC arrives at the conclusion that the allegations against the respondent has been proved, it shall recommend to the Management:

1. To take action for the Sexual harassment as misconduct. The action might range from issuance of warning letter/written apology by the harasser to the complainant/to dismissal from service.
2. To deduct, notwithstanding anything in service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, having regard to:
  - a. The mental trauma, pain, suffering and emotional distress caused to the aggrieved woman;
  - b. The loss in the career opportunity due to the incident of sexual harassment;
  - c. Medical expenses incurred by the victim for physical or psychiatric treatment
  - d. The income and financial status of Respondent
  - e. Feasibility of such payment in lump sum or in installments

It may be noted that in case the respondent fails to pay the recommended sum, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

**8. 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 the investigatory process to the extent practicable and appropriate under the circumstances.

**9. 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.





**10. PROTECTION TO COMPLAINANT / VICTIM:**

The Company is committed in ensuring that no employee 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 the 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.

**11. MISCELLANEOUS:**

Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees. II. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law. III. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report: a. Number of complaints of sexual harassment received during the year; b. Number of complaints disposed off during the year; c. Number of cases pending for more than 90 days; d. Number of workshops or awareness program against sexual harassment carried out; e. Nature of action taken by the employer.

**12. CONCLUSION:**

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

For **SUPREME PETROCHEM LTD**

*N. Gopal*

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MANAGER / CEO**

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