

JHS SVENDGAARD LABORATORIES LIMITED

CIN: L24230HP2004PLC027558

Regd. Office : Trilokpur Road, Kher (Kala-Amb), Tehsil-Nahan, Distt. Sirmour, Himachal Pradesh-173030

Corporate Office : B-1/E-23, Mohan Co-operative Industrial Area, Mathura Road, New Delhi – 110 044

E-Mail – enquiry@svendgaard.com, cs@svendgaard.com, Website: www.svendgaard.com

Tel: 011-26900411/412, Fax: 011-26900434

Policy of the Company under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

I. COMMITMENT:

Our Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours,

3. any other type of sexually-oriented conduct,
4. verbal abuse or 'joking' that is sex-oriented,
5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

V. POLICY STATEMENT

- a) All the employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All the employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All the employees are required to maintain a work environment, which is free from any kind of harassment.
- d) All the employees will refrain from committing any acts of sexual harassment at work place.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) All the employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

VI. PROCEDURE FOR DEALING WITH COMPLAINTS OF SEXUAL HARASSMENT

- a) If the person believes that she has been subjected to sexual harassment, then the complaint/grievance should be promptly reported to the Internal Complaints Committee (ICC) through the respective HR Manager or the Unit/Location/Department Head.
- b) Ideally, the complaint should be lodged immediately or within a reasonable period 3 months from the date of incident/last incident.
- c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.

- d) An “Internal Complaint Committee” has been set up to deal with the complaint.
- e) The complaint committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- f) Any victimization of, or retaliation against, the complainant or any JHS employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- g) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the ICC post investigations may recommend disciplinary action against the complainant.

VII. DISCIPLINARY ACTION

In case any such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

Sexual harassment will not be tolerated at JHS. If the outcome of an investigation by the Internal Complaints Committee shows that harassing behaviour has taken place, the harasser will be subject to disciplinary action up to and including termination of employment.

VIII. INTERNAL COMPLAINT COMMITTEE (ICC)

The committee will be chaired by a senior female employee of the company. In addition, the members would include two senior Business Heads, a senior HR person and an external executive from any NGO or association committed to the cause of women or a person familiar with the issues relating to sexual harassment. The members of the committee will be rotated every 3 years.

The Internal Complaint Committee may constitute sub-committees for places where JHS factories and regional offices are located. The ICC would examine each case and take a decision from time to time, for conducting the enquiry proceedings.

IX. CONFIDENTIALITY

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by JHS shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

X. MEMBERS OF INTERNAL COMPLAINT COMMITTEE (ICC)

The Internal Complaint Committee shall comprise of as many members as the Board of Directors may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the ICC shall comprise of the following:

- (i) One Presiding Officer who shall be a senior level woman employee of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) HR Manager;
- (iii) One member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The ICC shall have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company. The Board of Directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under the Act.

Frequently Asked Questions (FAQs)

1) What is sexual harassment?

Sexual harassment is defined as any unwanted physical, verbal or visual sexual advances, requests for sexual favours, and other sexually oriented conduct, which is offensive or objectionable to the recipient.

2) When is conduct unwelcome or harassing?

Unwelcome sexual advances (either verbal or physical), requests for favours and other verbal or physical conduct of a sexual nature constitute sexual harassment when: Submission to such conduct is either explicit or implicit act. The conduct having sexual overtones has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

3) What is not sexual harassment?

Sexual harassment does not refer to occasional compliments of a socially acceptable nature. It only refers to behaviour that is not welcome, that is personally offensive, that debilitates morale, and that, therefore, interferes with the morals and values at work.

4) What should one do if harassed sexually?

If anyone feels that she has been the recipient of sexually harassing behaviour, report it immediately to the supervisor and the respective HR Manager. It is preferable to make a complaint in writing, but one can accompany or follow up the written complaint with a verbal complaint. If the supervisor is the source of the harassing conduct, report the behaviour to the next level or as mentioned in the sexual harassment policy. The identity will be protected and one will not be retaliated against for making a complaint.

5) What happens after a complaint is made?

The ICC will investigate the complaint. The committee will first speak to the person who has made the complaint and then will speak to the person named in the complaint. The anonymity of the involved parties will be maintained.