

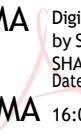


# Shalimar Paints -POSH Policy (Prevention of Sexual Harassment at Workplace)

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## **Policy on the Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace**

### **1. Objective**

Shalimar Paints Limited, its parent company, subsidiaries, group companies, associate companies and affiliates ('**the Company**' or '**Shalimar Paints**') are committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our Workplace (*as defined hereinbelow*), whether they are employees, customers, suppliers or visitors.

All employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to:

- Treat each other with dignity and respect;
- Follow the letter and spirit of law;
- Refrain from any unwelcome behavior that has sexual connotation (of sexual nature);
- Refrain from creating hostile atmosphere at workplace via sexual harassment; and
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the Organisation.

The objective of this Policy on Prevention, Prohibition and Redressal of Sexual Harassment at the workplace ("Policy") is to educate all persons employed or engaged by Shalimar Paints on what conduct constitutes sexual harassment, the ways and means to prevent occurrence of such conduct, the redressal mechanism in the event of occurrence of sexual harassment and the penal consequences of sexual harassment.

Though under the Act, the protection has been provided only to women, the Organisation's policy extends the protection against sexual harassment to all genders. The process of inquiry remains the same.

It is to be noted that since protection under law is for women (including transwomen), the execution of order/ action/recommendation in complaints from women, will be done under The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act. Meanwhile the execution of order/ action/ recommendation in complaints from any other gender will be done as under misconduct policy.

### **2. Applicability**

This Policy applies permanent employees, management, directors, retainers, consultants, staff, advisors, interns, trainees, apprentices (during the period of their internship, traineeship or apprenticeship), whether employed or engaged by Shalimar Paints on a temporary/part time/ad hoc/daily wage basis either directly or through an agent or contractor, with or without remuneration, on a voluntary or other basis ("Shalimar Paints Affiliates"). We require all Shalimar Paints Affiliates to make sure that they maintain mutual respect and positive regard towards one another.



### 3. Definition

**(i) Sexual Harassment shall mean and include:**

- a. Sexual harassment is unwanted conduct of a sexual nature. The unwanted nature of sexual harassment distinguishes it from behavior that is welcome and mutual. Physical conduct of a sexual nature includes all unwanted physical contact.
- b. Verbal forms of sexual harassment include unwelcome innuendoes, suggestions and hints, explicit demand or request for sexual favours, sexual advances, comments with sexual overtones, sexually colored remarks, which may include any unwelcome remark/comment/inappropriate remark/joke/insinuation about a person's dress, physique, age, marital status, planning a family, etc., objectionable sex-related jokes or insults or unwelcome graphic comments about a person's body made in their presence or directed toward them.
- c. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature or inappropriate inquiries, and unwelcome whistling directed at a person or group of persons.
- d. Non-verbal forms of sexual harassment include unwelcome gestures, indecent exposure, and the unwelcome display of sexually explicit pictures and objects in any media. Further, any unwelcome invitation or request, implicit or explicit, any lascivious look, lurid stares or other gesture associated with sexuality; and any unnecessary physical contact such as touching, caresses, pinching, molestation or assault may also amount to sexual harassment under this Policy.
- e. The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment, as defined in (a) above, may amount to sexual harassment:—
  - (i) Implied or explicit promise of preferential treatment at work; or
  - (ii) Implied or explicit threat of detrimental treatment at work; or
  - (iii) Implied or explicit threat about present or future employment status; or
  - (iv) Interference with work or creation of an intimidating or offensive work environment; or
  - (v) Humiliating treatment likely to affect health, safety or self-esteem.

**(ii) "Workplace"** for the purposes of this Policy includes all offices and off-sites of the Company and places visited by the Shalimar Paints affiliates where services are rendered or arising out of or during the course of employment/ engagement/ assignment, as the case may be, including transportation provided by the Company for undertaking such journey. Workplace would include the place of residence/any other place the Shalimar Paints Affiliate chooses to work from remotely for any reason whatsoever.

In the event of an occurrence of any instance of sexual harassment with respect to a Shalimar Paints Affiliate as a result of an act by a third party or an outsider during the course of employment or rendering of service, Shalimar Paints will take all necessary and reasonable steps to assist such affected Shalimar Paints Affiliate in terms of support and preventive action, including, but not limited to providing assistance to the Shalimar Paints Affiliate, if he/she/they so wishes to file a complaint under the Indian Penal Code, 1860.



**Aggrieved Person:** In relation to a workplace, any person (woman, man or transgender) of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

**Complainant:** Any aggrieved person who makes a complaint alleging sexual harassment under this policy.

**Respondent:** A person against whom a complaint of sexual harassment has been made by the Aggrieved person under this policy. The Respondent needs to be an employee of the Organisation.

**Employee:** A person employed at the 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.

**Internal Committee (known as IC):** The committee constituted in the Organisation in terms of this policy tasked with the prevention and redressal of sexual harassment at the workplace.

**Special Educator:** A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.

**Employer:** A person responsible for management, supervision and control of the workplace. The Employer will be responsible for the purpose of implementation and execution of this policy and IC recommendations.

#### 4. Policy Statement

- a. All Shalimar Paints Affiliates will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b. All Shalimar Paints Affiliates will understand and appreciate the rights of the individual to be treated with dignity.
- c. All Shalimar Paints Affiliates are required to maintain a work environment which is free from any kind of harassment.
- d. Shalimar Paints Affiliates 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. Shalimar Paints Affiliates will be protected against victimization, retaliation for filing or reporting a complaint on Sexual Harassment and will also be protected from false accusations.



## 5. Who can complain?

Complain can be filed by an aggrieved person in writing in format provided by the Organisation (in Appendix 1) or otherwise, as per the requirements as given under. The Act allows the following to file a complaint:

- a. If the Aggrieved person is unable to make a complaint on account of her/his/their physical incapacity, a complaint may be filed by:
  - i. their relative or friend; or
  - ii. their co-worker; or
  - iii. an officer of the National Commission for Women or State Women's Commission; or
  - iv. any person who has knowledge of the incident, with the written consent of the Aggrieved person
- b. If the Aggrieved person is unable to make a complaint on account of her/his/their mental incapacity, a complaint may be filed by:
  - i. their relative or friend; or
  - ii. a special educator; or
  - iii. a qualified psychiatrist or psychologist; or
  - iv. the guardian or authority under whose care they are receiving treatment or care; or
  - v. any person who has knowledge of the incident jointly with the Aggrieved person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care
- c. In case of Complainant's death: Any person with knowledge of incident with written consent of her/his/their legal heir
- d. In case complainant is unable to file the complaint for some other reason: By any person who has knowledge of the incident with her/his/their written conser.

## 6. Essentials of a Complaint

- a. Name of the aggrieved, work, designation
- b. In case complainant is not able to file the complaint then the relationship with the complainant and the consent form along with the reason for incapacity of the complainant;
- c. Date of the incident(s)/last incident;
- d. Name of the alleged harasser, designation, working relationship with the complainant;
- e. Details of the incident;
- f. Documents or evidence in support; and
- g. Remedy sought.

It is always advised to give your complaint in written. A format for the same is available as Appendix (1) to this policy. When you make your complaint verbally, the IC shall transcribe the same in written. As a complainant you should sign at the complaint submitted.

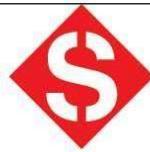


## 7. Constitution and Term of the Internal Committee

The Committee shall be responsible for investigating any violations to this Policy and recommending appropriate action. The Committee will have a minimum of 5 (five) members (including the chairperson) and will necessarily have at least 50% female representatives and shall comprise of the following:

- (i) the chairperson of the Committee, who shall be a woman employed at a senior level from amongst the Shalimar Paints or parent company;
- (ii) not less than 2 (two) members of the Committee shall preferably be Shalimar Paints Affiliates committed to the cause of women or who have had experience of social work or have legal knowledge;
- (iii) 1 (one) member from a non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

- a) The Committee shall also co-opt local members from the other offices.<sup>1</sup> In addition, the Committee shall also induct a secretary who shall be responsible to transcribe the proceedings of the meetings of the Committee with the complainant, respondent, witnesses and concerned parties during the course of the conciliation/inquiry process.
- b) In case a member of the Committee ceases to be or engaged, as the case may be, with the Company during the period of nomination, then the Company will appoint an alternate member to the Committee instead.
- c) Any member of the Committee shall be removed from the Committee if:
  - I. he/she makes known to the public, press or media by means of publishing, communicating or in any other manner, any information in relation to the content of a complaint, the identity and addresses of the Complainant, Respondent and witnesses, details of the conciliation and inquiry proceedings, recommendations of the Committee, or the action taken by the Company. Such non-disclosure obligation shall not apply to information regarding the justice secured to any Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant or witnesses should not be disclosed; or
  - II. he/she has been convicted for an offence or an inquiry into an offence under any law for the time being in force or is pending against him/her including any proceedings under the Act; or
  - III. he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her including any proceedings under the Act; or
  - IV. he/she has so abused his/her position as to render his/her continuance in office prejudicial to the public interest.



d) The chairperson or any member of the Committee cannot hold office for a period exceeding 3 (three) years from the date of their appointment. Changes in the constitution of the Committee whenever necessary shall be made as expeditiously as possible and in any case within 15 (fifteen) days of the date of vacancy of office by the chairperson or members. The identity and contact details of the current committee is as follows

Name	Committee Position	Designation	Contact Details	Email ID
Sheetal Shetty	Presiding Officer	Chief Human Resource Officer	09819862050	sheetal.shetty@shalimarpaints.com
Shalmali Sharma	Member	General Manager – HR	08879580346	shalmali.sharma@shalimarpaints.com
Bharti Pagar	Member	Manager Technical – R&D	09625037826	b.pagar@shalimarpaints.com
Sachin Naik	Member	Chief Financial Officer	09820022504	sachin.naik@shalimarpaints.com
Bhagavat Andhale	Member	Assistant General Manager – R&D	09921050289	Bhagavat.andhale@shalimarpaints.com
Vishal Bhagat	Member	Deputy General Manager - Marketing	09267984521	vishal.bhagat@shalimarpaints.com
Smita Kapoor	External Member	External Committee Member	09987199277	smita@kelphr.com

e) Local members from the offices will be co-opted in case the complaint is with respect to a Company Affiliate of the regional offices.

f) **Powers:** The IC has the powers of a Civil Court (as set out under Code of Civil Procedure, 1908):

- Examining on oath;
- Obtaining and production of documents;
- Summoning and enforcing attendance of parties and witnesses.

1. May terminate proceedings if complainant fails, without sufficient cause, to be present for three consecutive hearings. The IC should provide 15 days prior notice in writing to complainant.

2. May give ex-parte order if respondent fails, without sufficient cause, to be present for three consecutive hearings. The IC should provide 15 days prior notice in writing to the respondent.



g) **Responsibilities:** The IC will be responsible for:

- a. Receiving complaints of sexual harassment at the workplace;
- b. Initiating and conducting inquiry as per the established procedure;
- c. Submitting findings and recommendations of inquiries;
- d. Coordinating with the employer in implementing appropriate steps for prevention and prohibition of sexual harassment;
- e. Maintaining strict confidentiality throughout the process as per established guidelines;
- f. Submitting annual reports in the prescribed format;
- g. Collaborate with the HR/relevant department to ensure that enough training and communication is done on a regular basis;
- h. Propagate the values and culture of the organisation with respect to the gender diversity and acceptance;
- i. Walk the Talk - Ensure that one practices respect and equality in all respects at the workplace.
- j. All complaints from employees, customers, suppliers or visitors in relation to a violation of this Policy addressed to the Committee may be sent to Presiding Officer.
- k. On receipt of the complaint, the Committee shall evaluate if any of the members of the Committee are involved in or closely connected with the complaint so as to result in a conflict of interest with that of the parties involved. In the event of a conflict of interest, such member so conflicted shall not participate in the proceedings for the investigation into the relevant complaint and the Committee may co-opt other members to conduct the investigation for such complaint.

## **8. REDRESSAL MECHANISM**

There are two ways of redressal available as per law:

Informal Resolution procedure through conciliation

- a. Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the Aggrieved person.
- b. No monetary settlement can be made as a basis of conciliation.
- c. In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action.
- d. It is mandatory to ensure that both parties have consented to the conciliation process. In some cases, such as those in which the respondent is alleging that the complaint is malicious, they may wish to proceed directly with the inquiry process.

Formal Resolution procedure through formal inquiry

The committee will initiate inquiry in the following cases:

- a. No conciliation is requested by Aggrieved person;
- b. Conciliation has not resulted in any settlement;



- c. Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent.

In compliance with the Act, any complaint under this policy, if not settled through conciliation, shall be followed by a formal redressal mechanism as described in this Policy.

#### **9. Procedure for Dealing with Complaints of sexual harassment**

- a) If the Shalimar Paints Affiliate or Aggrieved person believes that he/she/they has/have been subjected to Sexual Harassment, such person shall promptly report their complaint/grievance to the Internal Committee ("IC", or "Committee") through the HR Head or an IC Member in writing.
- b) Ideally, the complaint should be lodged immediately or within a reasonable period from the date of incident/last incident, and in no case later than 3 (three) months from the date of incident/last incident, as the case may be. The Committee may extend the time period by a maximum of 3 (three) more months by recording the reasons for the same if it is satisfied that circumstances were such which prevented the Complainant from making a complaint within the said period. The constitution, powers and workings of the Committee are explained in subsequent sections. When a complaint of Sexual Harassment is made, it will be investigated promptly.
- c) In case the Complainant is unable to make a written complaint, the Committee shall render all reasonable assistance to the Complainant for making the complaint in writing. The Complainant shall peruse the same and shall for the purposes of authentication of the record, sign the recorded statement/complaint and/or Company shall send the same by email to [spl.posh@shalimarpaints.com](mailto:spl.posh@shalimarpaints.com). In a situation wherein it is not possible to put signature by hand on the recorded statement/ complaint. It is expressly clarified that at the earliest possible instance, the Complainant or the person filing the complaint on behalf of the Complainant shall sign the recorded statement/complaint.
- d) At the time of filing of the complaint, the Complainant is required to submit the complaint along with supporting documents and names and addresses of the witnesses to the Committee.
- e) On receipt of the complaint, the Committee shall send 1 (one) of the copies received to the Respondent within a period of 7 (seven) working days.
- f) The Respondent is required to file his/her/their reply to the complaint along with his/her/ their list of documents, and names and addresses of witnesses, within a period not exceeding 10 (ten) working days from the date of the receipt of the documents specified in clause 4 (i) above.
- g) Upon the receipt of the complaint, the Committee will inform the Complainant of the process of the redressal before initiating an inquiry and at the request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- h) Where a settlement has been arrived at on the basis of conciliation, the Committee shall record the settlement so arrived and forward the same to the HR Department to take action as specified in the settlement. The copies of the settlement shall also be provided to the Complainant and the Respondent. A copy of the settlement to be shared with the management



- i) No further inquiry with respect to the complaint will be required to be conducted by the Committee in case of a settlement arrived at in accordance with the above.
- j) Where the Complainant does not opt for settlement through conciliation or in the event the Complainant informs the Committee that the terms and conditions of the settlement arrived at have not been complied with by the Respondent, the Committee shall proceed to make an inquiry in the manner set out hereunder:
  - (i) The Committee shall interview the relevant persons and inspect necessary documents and records. During the inquiry, the Committee shall hold a hearing where the Respondent and the Complainant shall be given a fair and reasonable opportunity to present his/her/their case, to call for his/her/ their evidence and to cross-examine witnesses. The cross examination will not be face to face and will be done by submitting questions in writing to the Committee who will conduct the cross examination. It is expressly provided that in case an inquiry process as stated hereinbefore is not possible to be undertaken in physical presence, the process shall be conducted through audio-visual process which shall be recorded with prior intimation of the same being recorded and the recording will be provided to the relevant parties for confirmation via email at the earliest instance. Any signatures which will be required will be taken from the relevant parties at the earliest possible instance.
  - (ii) On conclusion of the investigation, the Committee shall send a copy of the findings of the investigation to both the Respondent and the Complainant enabling them to make representations against the findings within the reasonable time specified, to the Committee.
  - (iii) The inquiry by the Committee is required to be completed within 90 (ninety) days of the receipt of the complaint from the Complainant. Following the hearing, the Committee will issue a report within 10 (ten) days from the date of completion of the inquiry to the Chief Executive Officer of the Company. The HR Department will be informed regarding the outcome of the investigation which needs to be maintained in their record for future reference. A copy of such report will be served to the Respondent and the Complainant. The report shall contain the findings of the Committee based on the investigation and the hearing along with its recommended action.
  - (iv) The Committee can decide upon the disciplinary action/punishment to be handed to the Respondent. The Committee shall record its reasons in writing. The actions that may be recommended by the Committee include:
    - (1) written apology, warning, reprimand or censure that shall be placed in the personal file of the Respondent;
    - (2) withholding of promotion or reduction in designation, deduction/payment of such compensation as it may consider appropriate to be paid to the Complainant or to his/her/their legal heirs;
    - (3) withholding or stoppage of pay rise or increments;
    - (4) dismissal from service;



(5) undergoing a counseling session;

(6) carrying out of community service; or

(7) any other action that the Committee may deem fit.

(v) For determination of compensation, if any, the Committee shall take into account the mental trauma, pain, suffering and emotional distress caused to the Complainant, the loss in the career opportunity due to the incident of sexual harassment, medical expenses incurred by the Complainant for physical or psychiatric treatment, the income and financial status of the Respondent and feasibility of such payment in lump sum or in installments.

(vi) The Committee shall make inquiry into the complaint in accordance with the principles of natural justice.

(vii) The Committee shall have the right to terminate the inquiry proceedings or to give an *ex parte* decision on the complaint, if either of the parties fail, without sufficient cause, to present themselves for 3 (three) consecutive hearings of the Committee. However, such termination or *ex parte* order may not be passed without giving a written notice of 15 (fifteen) days in advance, to the party concerned.

(viii) The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Committee.

(ix) Committee meetings in case of any investigation can be attended through a VC or a conference call.

(x) In conducting the inquiry, a minimum of 3 (three) members of the Committee including the chairperson shall be present. However, the final report will be signed by every member of the committee.

k) For the purpose of making the inquiry, the Committee will be vested with the following powers:

(i) summoning and enforcing the attendance of any person and examining him/her on oath; and

(ii) requiring the discovery and production of documents

l) During the pendency of the inquiry, on a written request made by the Complainant, the Committee may recommend the transfer of the Complainant or the Respondent, to any other team within the existing office or to another office, or grant leave to the Complainant up to a period of 3 (three) months (such leave shall be in addition to the leave entitled as per the leave policy of the Company) or restrain the Respondent from reporting on the work performance of the Complainant or writing confidential report of the Complainant, and assign the same to another officer. Additionally, the Committee on its own may recommend transfer of the Respondent to any other team within the existing office or to another office or may ask the Respondent to proceed on leave till the inquiry is pending. In any event, the Committee shall ensure that there is no reporting relationship between the Respondent and the Complainant and further ensure that the Respondent is restrained from conducting work assessment of the Complainant and/or writing the confidential report of the Complainant. Work assessment of the Complainant shall be assigned to another member of the Company. The HR shall promptly



implement such recommendation of the Committee and send a report evidencing implementation of the same to the Committee.

- m) No Shalimar Paints Affiliate will be subjected to retaliatory action relating to his or her report of any alleged sexual harassment. The Company will ensure that any Shalimar Paints Affiliate subjected to sexual harassment or any Shalimar Paints Affiliate giving evidence in connection with an instance of sexual harassment is not victimised or discriminated against while dealing with complaints of sexual harassment and/or in his/her career in the Company.
- n) Special privacy safeguards will be applied to the investigation and complaints will be handled on a confidential "need to know" basis. Publishing/communicating or in any other manner making known to other people in the Company, public, press or media any information in relation to the contents of the complaint, the identity and addresses of the Complainant, respondent and witnesses, the conciliation and inquiry proceedings, recommendations of the Committee, or the action taken by the Company is prohibited. Such prohibition however, does not apply to information regarding the justice secured to the Complainant. However, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant, Respondent or witnesses should not be disclosed.
- o) The meetings or investigations of the Committee may be held outside the premises of the Company.
- p) Any person who is entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or action under this Policy and contravenes the provisions of confidentiality will be liable to pay a fine of INR 5,000 (Rupees Five Thousand Only) to the Company in addition to other penalties which may be recommended by the Committee.
- q) On receipt of the outcome of the inquiry from the Committee with the aforesaid recommended actions, the HR Department shall act upon the recommendation within a maximum period of 60 (sixty) days of its receipt.
- r) Any victimization of, or retaliation against, the Complainant or any Affiliate who gives evidence regarding sexual harassment will be subject to disciplinary action up to and including termination of employment.
- s) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the IC post investigations may recommend disciplinary action against the complainant. However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant.
- t) In case the Complainant or the Respondent is aggrieved from the decision of the Committee or in case of non-implementation of the recommendation of the Committee, such aggrieved person may prefer an appeal within 75 (seventy five) days from the date of receipt of the decision of the Committee or to the appellate authority notified under Section 2(a) of the Industrial Employment (Standing Orders) Act, 1946 within 90 (ninety) days from the date of receipt of decision of the Committee.

#### **10. Functions and Duties of the Committee**

- a. Inquiry, investigation and redressal of complaints relating to sexual harassment in a fair and expeditious manner;



- b. Recommend appropriate psychological, emotional and any other necessary support (counseling, security and other assistance) for the Complainant;
- c. Document minutes of meetings and discussions held by the Committee with the Complainant, Respondent, witnesses, etc. during the course of the redressal proceedings;
- d. Ensure strict confidentiality of the contents of the complaint, identity of persons involved and of the redressal proceedings. Such responsibility of confidentiality shall also vest with the secretary inducted by the Committee to transcribe minutes of the proceedings;
- e. Ensure protection of the Complainant against discrimination/ victimisation/ retaliation and recommend appropriate action in case of occurrence thereof; and
- f. Preparing the annual report at the end of the calendar year and submission of such report to the HR Department and to the District Officer as required under the Act. The annual report shall contain the following details:
  - i. number of complaints of sexual harassment received in the year;
  - ii. number of complaints disposed of during the year;
  - iii. number of cases pending for more than 90 (ninety) days;
  - iv. number of workshops or awareness programs against sexual harassment carried out; and
  - v. nature of action taken by the employer or District Officer.

#### **11. Disciplinary Action**

In case any such conduct amounts to a specific offence under the Indian Penal Code, 1860 or under any other law, the Company shall initiate appropriate action in accordance with the law by lodging a complaint with the appropriate authority.

#### **12. Awareness**

- a. All the employees, agents, customers, vendors, partners and visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team
- b. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the Company during their initial Induction
- c. The Company shall comply with all other details as set out under POSH Act 13 to ensure that all employees are provided with the safe working environment at the workplace

#### **13. Monitoring**

The Internal Committee will monitor results in achieving the policy objective and statement



#### **14. Confidentiality**

The contents of the complaint, the identity and addresses of the aggrieved employee, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by Shalimar Paints 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. Any person contravening the confidentiality clause is subject to disciplinary action, including termination, and fine of Rs. 5000/- or above depending upon the intensity and impact of the breach.

#### **15. Enforcement and Amendment**

- a. This Policy shall come into force with immediate effect and shall be binding on all Shalimar Paints Affiliates.
- b. Any amendments to the Policy shall be approved by the board of directors and will subsequently be suitably communicated to the Shalimar Paints Affiliates.

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