

# Prevention of Sexual Harassment at Workplace Policy

## I. Commitment:

Sona Biscuits Limited ('the Company') is committed to ensuring that all persons engaged with the Company work in an environment that is inclusive, safe, fair, respectful and conducive to bringing their best selves to work.

The Company strives to provide a workplace that ensures every person is treated with dignity, respect, and equality and afforded equitable and fair treatment.

The Company is also committed to creating and maintaining a healthy work environment that enables all employees to work without fear of prejudice, gender bias, discrimination, sexual harassment, or any form of intimidation or exploitation.

The Policy reflects the Company's zero-tolerance approach towards sexual harassment. Any act of sexual harassment will attract prompt and appropriate disciplinary action in accordance with applicable laws and the Company's policies.

This policy is intended to educate and sensitize employees about what constitutes sexual harassment, the preventive measures adopted by the Company, and, in the unlikely event of such an occurrence, to ensure a fair, confidential, and impartial mechanism for redressal of complaints.

## II. Scope:

Without prejudice to the provisions contained in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act"), the Policy shall apply to all persons engaged with the Company, including employees (whether full-time, part-time, probationers, trainees, apprentices, interns, or contract personnel engaged directly or through contractors or agencies)

It shall also extend to any women visiting the Company's premises, or any women service provider, vendor, consultant, customer, or business associate, are governed by these guidelines.

Where any act of Sexual Harassment occurs involving an employee of the Company as a result of conduct by a third party or outsider while on official duty, the Company shall take all necessary, reasonable and prompt steps to support the affected person and to prevent recurrence of such incidents, in accordance with the spirit and intent of the Act

## III. Definition and Interpretation:

Act : shall mean the Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed thereunder, as amended from time to time

Aggrieved party: In relation to the Workplace, any employee, trainee, intern, contract worker, visitor, or service provider, who alleges to have been subjected to an act of sexual harassment by the Respondent.

Employee: A person employed at a 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, intern, or any person called by any other such name.

Respondent: In relation to the Workplace, any employee, contract worker, visitor or service provider against whom the aggrieved party has made a complaint of sexual harassment.

Sexual Harassment: includes any or more of the following unwelcome acts or behavior (whether directly or by implication), namely:

1. Physical contact and advances; or
2. A demand or request for sexual favors; or
3. Making sexually colored remarks; or
4. Showing pornography; or
5. Any other unwelcome physical, verbal, or nonverbal conduct of sexual nature.

The following categories illustrate acts that may constitute sexual harassment. The list is illustrative and not exhaustive:

#### 1] Physical Harassment

- Physical contact and advances;
- Intentional touching, pinching, grabbing, brushing against another's body;
- Sexual assault;
- Cornering, trapping or blocking another's pathway;
- Any other unwelcome physical conduct of sexual nature;

#### 2] Written or Graphic Harassment

- Showing or displaying pornographic or sexually explicit material;
- Circulating written or electronic communication (including e-mails, messages, social media, or other digital platforms) that has sexual implications
- Leering or staring at another's body and / or sexually suggestive gesturing;
- Displaying sexually visuals, posters, cartoons, graffiti, or digital content;

### 3] Verbal Harassment

- Demanding or requesting sexual favours in exchange for employment benefits, work conditions, promotions, or increments (commonly known as "quid pro quo" harassment);
- Making sexually colored remarks, slurs, or comments;
- Using sexually suggestive or offensive jokes, humour, or innuendoes;
- Making comments about a person's body, attire, or appearance in a sexual manner;
- Using derogatory language, threats, or suggestive remarks towards any individual

Workplace: includes, but is not limited to:

1. All offices, plants, factories, or other premises where the Company's business or operations are conducted;
2. All Company-related activities performed at any other site away from the Company's premises, including official travel, off-site meetings, company events, training sessions, and customer/vendor locations;
3. Virtual or digital workspaces, including communication through e-mails, calls, video conferences, or social media used for official communication.

## IV. Complaint Mechanism:

An appropriate complaint mechanism in the form of Internal Committee ('IC') has been constituted in the Company for the prevention, prohibition, and redressal of sexual harassment, in accordance with the provisions of the Act.

The Committee shall ensure fair, impartial, and time-bound investigation of complaints made by the aggrieved party, while maintaining strict confidentiality throughout the process.

## V. Internal Committee:

The Company has constituted an Internal Committee (IC) in compliance with the Act to receive, examine, and redress complaints relating to sexual harassment and to ensure prompt and sensitive handling of such matters.

The composition of the IC shall at all times be in accordance with the requirements prescribed under the Act.

The Presiding Officer of the Committee reserves the right to nominate additional members of appropriate seniority and rank to the Committee to ensure equal gender representation as that of the complainant, or for any other valid reason considered necessary for fair and effective inquiry.

The IC shall be responsible for:

1. Receiving and investigating formal complaints of sexual harassment;
2. Conducting fair and unbiased inquiries in accordance with the procedure prescribed under the Act;
3. Recommending appropriate disciplinary or corrective measures based on its findings; and
4. Promoting awareness and preventive measures to discourage and eliminate sexual harassment at the workplace.

The IC constituted at the Head Office shall also serve as the IC for all administrative units, branch offices, factories, and other establishments of the Company. The composition and functioning of the Committee shall be in full compliance with the provisions of the Act.

## VI. Governance and Complaint Mechanism:

The Company is committed to providing a supportive and transparent environment for the prevention and redressal of sexual harassment at the workplace. The following mechanism outlines the process of raising concerns, resolving complaints, conducting enquiries, and ensuring appropriate reporting and governance.

- Informal Resolution Option

When any incident of sexual harassment occurs, the aggrieved person may communicate their disapproval and objection directly to the harasser and request that such conduct cease immediately.

If the harassment does not stop, or if the aggrieved person is not comfortable addressing the harasser directly, they may approach the IC for advice, assistance, or redressal. The IC shall take such steps as it deems appropriate, including extending counselling support or initiating an enquiry, to resolve the matter promptly.

- Formal Complaint

If informal resolution is not possible or not preferred, the aggrieved person may submit a written complaint to the Internal Committee along with supporting documents and names and addresses of witnesses, within three (3) months of the date of the incident. In case of a series of incidents, the complaint may be made within three (3) months from the date of the last incident.

The IC may extend this time limit by a further three (3) months if it is satisfied that the circumstances prevented the aggrieved person from filing the complaint within the initial period.

Complaints may also be submitted through email. The complainant shall disclose their name, department, division, and location to enable the IC to contact them and take the matter forward.

In addition to the internal mechanism, the aggrieved person shall retain the right to pursue any legal remedies available under applicable law.

- Redressal Process

Upon receipt of the complaint, the Presiding Officer of the IC shall first determine whether the allegations fall within the definition and scope of "sexual harassment" under the Policy and the POSH Act.

If yes, the respondent (the person against whom the complaint is made) shall be called upon to appear before the IC and submit a written explanation. Thereafter, a formal Enquiry shall be initiated.

If the IC concludes that the allegations do not constitute sexual harassment or are outside its jurisdiction, the same shall be recorded with reasons in writing and communicated to the complainant.

- Enquiry

The IC shall promptly commence the enquiry and inform both the aggrieved person and the respondent. A statement of allegations shall be provided to the respondent, who shall submit a written explanation within ten (10) days of receiving it.

Copies of all written explanations and documents submitted by either party shall be shared mutually. Each party shall provide original copies of documentary evidence, duly signed to certify authenticity.

The IC shall endeavour to complete the enquiry within a reasonable period, but not later than three (3) months from the date of the complaint.

The IC shall prepare a reasoned report of its findings and recommendations and submit the same to the Competent Authority within ten (10) days of concluding the enquiry. A copy of the report shall also be provided to both the complainant and the respondent.

Based on the IC's findings, the Company may impose appropriate disciplinary action in accordance with its service rules.

- Recommendation By ICC and actions

Upon completion of the inquiry, the ICC shall submit its report of findings to the competent authority within 10 days and make it available to the concerned parties.

If the allegation is not proved, the ICC shall recommend that no action is required.

If the allegation is proved, the ICC shall recommend appropriate action as per service rules, which may include:

1. Formal apology
2. Counselling
3. Written warning to the perpetrator, with a copy maintained in the employee's file
4. Change of work assignment/transfer for the perpetrator or the victim
5. Suspension or termination of the employee found guilty
6. Withholding of promotion

In cases of false complaints, the complainant may be liable for disciplinary action deemed appropriate by management.

(For process illustration, refer to Annexure A.)

## VII. False Claims:

The Company recognizes that while the policy is designed to protect employees from genuine incidents of sexual harassment, there may be instances where complaints are deliberately false or malicious. If an investigation establishes that a complaint was filed with the sole intention of defaming or harming the reputation of the respondent, the following measures may be taken:

- **Disciplinary Action against the Aggrieved Party:** Appropriate disciplinary measures will be recommended by the Complaints Committee and recorded in the personal file of the complainant. Such measures may include a written warning, counseling, suspension, withholding of promotion, or termination, depending on the severity of the misconduct.
- **Action against Witnesses:** Any person who knowingly provides false evidence, or submits forged or misleading documents, may also face disciplinary action.
- **Safeguards:** While taking action against false claims, care will be taken to ensure that genuine complaints are not discouraged, and the process remains fair and unbiased. The Company emphasizes that false complaints are rare but can undermine the integrity of the policy and cause undue distress to innocent employees.

The aim is to balance the protection of genuine victims while maintaining accountability for misuse of the policy.

## VIII. Confidentiality:

The Company recognizes the sensitivity of complaints related to sexual harassment and the need to protect the interests of all parties involved.

Every person participating in the complaint process, including the aggrieved party, respondent, witnesses, and members of the Complaints Committee, is expected to maintain strict confidentiality at all times. This covers the content of the complaint, identities of all parties, and any information relating to conciliation, inquiry, or Committee recommendations.

Confidentiality ensures that the investigation is fair, unbiased, and protects the dignity and safety of everyone involved. The Company strictly prohibits any form of retaliation or victimization against anyone who raises concerns, reports harassment, or participates in the complaint process. Any person found violating the confidentiality or non-retaliation provisions will be subject to disciplinary action in accordance with the Company's rules, the Act, or other applicable legal protocols.

## IX. Access to Reports and Documents:

All records related to complaints, including meeting notes, investigation results, and any other relevant material, will be maintained confidentially by the Company. Such information will only be disclosed when necessary for disciplinary action or other remedial processes in accordance with the Company's policies and applicable law.

## X. Protection to Complainant / Victim:

The Company is committed to ensuring that any employee who raises a concern or lodges a complaint of harassment is protected from any form of reprisal, retaliation, or victimization. Disciplinary action will be taken against anyone found engaging in such conduct. The Company also ensures that witnesses or other participants involved in the complaint process are not subjected to discrimination or any adverse treatment. At the same time, any individual who misuses the procedure, for example, by making a knowingly false or malicious allegation, may also be subject to disciplinary action.

## XI. Reporting Mechanism:

The Internal Committee shall meet at least once every calendar year, maintain proper records of its proceedings, and prepare an Annual Report containing:

- The number of complaints received and disposed of;
- The nature of action taken by the Company; and
- Any other relevant details as required under law.

This report shall be submitted to the Competent Authority and included in the Company's annual report in compliance with the provisions of the POSH Act.

In addition, the Internal Committee shall submit periodic updates to the Audit Committee and the Board of Directors of the Company periodically as maybe decided from time to time po ensure appropriate oversight, transparency, and governance.

## XII. Reporting Channels:

Email: [hr@sobisco.com](mailto:hr@sobisco.com) , [cs@sobisco.com](mailto:cs@sobisco.com)

Write to: Internal Committee, President Officer, Sona Biscuits Limited

15A Hemanta Basu Sarani, Continental Chambers, 5th Floor, Kolkata 700001, West Bengal

Contact: 033 40455555

## XIII. Conclusion:

The Company reaffirms its commitment to providing a safe and respectful workplace for all employees, free from harassment and discrimination. Every employee is expected to treat colleagues with dignity, and the Company will continue to implement measures to uphold these principles and foster a positive work environment.

## ANNEXURE - PROCESS FLOW CHART

