GSP CROP SCIENCE LIMITED

POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

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OBJECTIVE:

GSP Crop Science Limited (Hereinafter referred to as the "Company" or "GSP") has a 'zero-tolerance' approach to any instance of sexual harassment. GSP is committed to provide a safe and productive work environment that promotes confidence to work, innovate and perform without fear of any harassment.

By this policy GSP provides effective resolution for any instance related to sexual harassment. Its objective is to prevent / deter the commission of acts of sexual harassment at workplace.

APPLICABILITY:

This policy is applicable to every 'employee' of GSP and employed at a work place for any work on regular, temporary, ad hoc, either directly or indirectly or through an agent including contractor, advisers, consultants and visitors and also includes any places visited by the employee arising out of and during the course of employment including the transportation provided by the Company.

This policy is put in place in GSP as required by the Supreme Court under the Sexual Harassment of Women at Work Place (Prevention, Prohibition and Redressal) Act, 2013 (the Act) and hence applies to harassment against women only. Any other act of harassment or discrimination matters shall be dealt as per GSP Group Policy / Code of Conduct and employment conditions of the Company.

DEFINITION:

'**Aggrieved woman / Complainant**' means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;

'**Employee**' means a person employed at a work place for any work on regular, temporary, ad hoc or daily wage basis, either directly or indirectly or through an agent, including a contractor, with or, without the knowledge of the principle 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, apprentices or called by any other such name, including subsidiaries companies employees;

'Employer' means a person responsible for management, supervision and control of the workplace or any other person / authority so nominated by the employer to carry out tasks delegated under this act;

'**Internal Complaints Committee/ICC**' means a committee(s) constituted under Section 4 of the Act to receive all complaints pertaining to sexual harassment and further perform all other functions as provided in the Act.

'Presiding Officer' means the Presiding Officer of the Internal Complaints Committee nominated under this act.

"Member" means a Member of the Internal Complaints Committee.

'**Respondent**' means a person against whom the aggrieved woman / Complainant has made a complaint.

'**Sexual Harassment**' would mean any or more of the following unwelcome acts or behaviors (whether directly or by implication):

- Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly;
- Unwelcome sexual advances involving verbal, non-verbal or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affects performance;
- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;

The following circumstances connected and related with acts or behaviors of sexual harassment will, including but not limited to, amount to sexual harassment:

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

INTERNAL COMPLAINTS COMMITTEE (ICC)

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Complaints Committee" is constituted. The details of the committee is notified to all covered persons at all the workplaces of the Company.

THE COMMITTEE SHALL COMPRISE OF:

- A Presiding Officer who shall be a woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women having legal knowledge or have experience in social work
- One external member, familiar with the issues relating to sexual harassment or a resource from an NGO nominated by the management from time to time having knowledge of such issues

The Composition of the Committee shall be such that at least half of the total members are women.

The Presiding Officer and other Members of the ICC shall remain a Committee member for a period not exceeding three years from the date of their respective appointment.

Any change in the member(s) shall be notified by the Management accordingly.

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The Committee is responsible for:

- Receiving complaints of sexual harassment at the workplace;
- Initiating and conducting inquiry as per the established procedure;
- Submitting findings and recommendations of inquiries;
- Coordinating with the employer in implementing appropriate action(s);
- Maintaining strict confidentiality throughout the process as per established guidelines;
- Submitting annual reports in the prescribed format as detailed in the Act.

Where the Presiding Officer or any Member of the ICC:

- contravenes the provisions of the act; or
- has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- has abused his / her position as to render his continuance in office prejudicial to the public interest

Such Presiding Officer or Member shall be removed from the Committee and vacancy created shall be replaced by the Company in accordance with the act.

MANNER OF MAKING A COMPLAINT:

An aggrieved woman / Complainant may make a Complaint in writing in the format as prescribed in **Annexure - A** to any of the members of the ICC from her respective location within a period of 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 last incident.

The ICC may, at its discretion, extend the time limit in above cases not exceeding further three months, if it is satisfied that the circumstances were such which prevented the aggrieved woman / Complainant from filing a complaint within the said period. The reason due to which further extension is given must be recorded in writing by the ICC.

In case the aggrieved woman / Complainant is unable to make a complaint in writing, then ICC can render all reasonable assistance to make a complaint in writing or in case the aggrieved women/complainant is unable to make a written complaint on

account of her physical or mental incapacity or death or otherwise, her legal heir or such other person can make a complaint to the ICC.

An aggrieved woman / Complainant can also lodge a complaint addressed to the Presiding Officer or any of the members of the ICC in writing or through e-mail along with relevant supporting documents and witnesses, wherever applicable, in a confidential manner on the designated e-mail ID – womanvalues@gspcrop.com.

On receipt of the Complaint, the ICC shall intimate the Complaint to the Respondent within seven days. The respondent will file his reply along with relevant supporting documents and witnesses, wherever applicable, within a period not exceeding 10 days from the date of the receipt of the Complaint. The ICC shall make inquiry into the Complaint in accordance with the principles of natural justice.

MANNER OF INQUIRY/ACTION:

The ICC can request the aggrieved woman / complainant and the respondent to settle the matter through conciliation before initiating an inquiry. However no monetary settlement shall be offered or made by the respondent on basis of the conciliation. Where a settlement between the Complainant and the Respondent is decided, the ICC shall record the settlement and forward the same to the concerned authority. No further inquiry shall be conducted or arriving at a settlement.

The ICC shall provide the copies of the settlement as recorded to the aggrieved woman / Complainant and the respondent.

The ICC shall have a right to pass an ex-parte order if the respondent or the aggrieved woman / Complainant remains absent for three (03) sequential hearings without giving ICC sufficient cause provided that such termination or ex-party order may not be passed without giving a written notice of 15 days in advance to the aggrieved woman/complainant or respondent concerned.

Neither the aggrieved woman / Complainant nor the respondent shall be allowed to represent with their lawyers by the ICC during the pendency of a complaint. The Aggrieved woman / Complainant and respondent during the course of inquiry must be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.

The ICC shall complete the inquiry in the shortest possible time, not exceeding a period of 60 working days from the date on which the complaint is referred to it, except for special reasons, to be recorded in writing and provided permission is obtained from the concerned authority (For plant – Site Head and for Head Office – Chief Human Resource Officer).

The ICC shall further report its findings with recommendations to the concerned authority of the Employer (For plant – Site Head and for Head Office – Chief Human Resource Officer) with an intimation marked to Representative of HR in

accordance with the provisions of the services rules//code of conduct/disciplinary action for misconduct within 10 days from the date of completion of the inquiry.

Chief Human Resource Officer of the Company would further decide the course of action as per the service rules / code of conduct and act to implement the recommendations of the ICC within 10 days from the date of receipt of the recommendations from ICC.

It shall be the discretion of the Chief Human Resource Officer of the Company to accept or reject any recommendation(s) made by the ICC in its report if he/she is of the opinion that circumstances warrant such acceptance or rejection.

ACTION DURING PENDENCY OF INQUIRY

During the pendency of an inquiry on a written request made by the aggrieved woman / Complainant, the Internal Committee may recommend to the employer to**:**

(*a*) transfer the aggrieved woman / Complainant or the respondent to any other workplace; or
(*b*) grant leave to the aggrieved woman / Complainant up to a period of three months; or
(*c*) grant such other relief to the aggrieved woman / Complainant as deemed appropriate.

The leave granted to the aggrieved woman / Complainant under this act shall be in addition to the leave she would be otherwise entitled.

OTHER RELIEF TO COMPLAINANT DURING PENDENCY OF INQUIRY

The ICC at the written request of the aggrieved woman / Complainant may recommend to the employer to restrain the respondent from reporting on the work performance of the aggrieved woman / Complainant or writing her confidential report and assign the same to another officer.

APPEAL

An aggrieved woman / Complainant or respondent to the complaint may appeal to the Court or tribunal within 90 days from the date of recommendation made by the ICC.

ACTION FOR FALSE OR MALICIOUS COMPLAINT OR FALSE EVIDENCE

Any complaint on sexual harassment lodged by any woman employee shall be taken up with utmost priority by the concerned authority of the Company (For plant – Site Head and for Head Office – Chief Human Resource Officer).

Where the ICC arrives at a conclusion that the allegation against the respondent is made with malicious intent or the aggrieved woman / Complainant produced any forged or misleading documents to prove her case, the ICC may recommend the concerned authority of the Company (For plant – Site Head and for Head Office – Chief Human Resource Officer) to take disciplinary action in accordance with provisions of the service rules / Code of conduct towards misconduct.

However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

CONFIDENTIALITY

All or any information received in relation to the complaint lodged by the aggrieved woman/complainant or any person providing information in relation to the complaint lodged shall be kept confidential. Any person (including witness) who breaches confidentiality shall be subject to disciplinary action by the Chief Transformation Officer.

PROTECTION AGAINST RETALIATION

No unfair treatment shall be meted out to the aggrieved woman/complainant lodging the complaint with ICC in good faith and shall be protected from any form of retaliation. While dealing with complaints of sexual harassment, the ICC/ delegated authority of the Employer shall ensure that the aggrieved woman/complainant or the witness are not victimized or discriminated against by the respondent. Any act of retaliation shall itself be treated by the Company as violation of this policy and service rules / Code of conduct of the Company and could result in disciplinary action up to and including discharge. This protection also extends to anyone providing information in relation to an investigation.

COMMITTEE TO SUBMIT ANNUAL REPORT

The ICC shall in each calendar year prepare, an Annual Report and submit the same to the employer detailing.

(a) number of complaints of sexual harassment received in the year;
(b) number of complaints disposed off during the year;
(c) number of cases pending for more than ninety days;
(d) number of workshops or awareness programme against sexual harassment carried out;
(e) nature of action taken by the employer.

EMPLOYER TO INCLUDE INFORMATION IN ANNUAL REPORT

The employer shall include in its report the number of cases filed, if any, and their disposal under this Act in the Annual Report of the organization.

The company management reserves the right to amend, alter or withdraw the above policy without assigning any reason or prior notice.

This Policy was approved by the Board of Directors at its Meeting held on 6th December, 2024.

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ANNEXURE – A

(Strictly Confidential)

Date:

To,
The Internal Complaint Committee
Location: Plant / HO

Dear Sir / Madam,

I would like to file a formal sexual harassment complaint to the Internal Complaint Committee. I request you to take up the matter for suitable action.

Relevant details of complaints are given below:

Date(s) of incident(s):_____
Complaint against: _____

Brief details of the incident that made you felt sexually harassed:

_____
_____
_____
_____
_____
_____

(Details can also be provided as an Annexure to this format)

I hereby abide that I shall keep this matter confidential and shall not discuss about this incident.

Yours Faithfully,

Name:
Designation