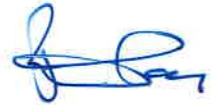


GHCL LIMITED

GENDER-NEUTRAL POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE



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GHCL Limited



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GENDER-NEUTRAL POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

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GENDER-NEUTRAL POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

To be read in conjunction with the Prevention against Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

1. Policy:

GHCL is an equal-opportunity employer and is committed to creating a healthy work environment that enables employees to work without fear of prejudice, gender bias, and sexual harassment. GHCL also believes that all its employees have the right to be treated with dignity and protected against harassment. GHCL does not tolerate verbal or physical conduct creating an intimidating, offensive, or hostile environment for employees rather it is a value-driven organization wherein all 4 Core Values (Respect, Trust, Ownership, and Integrated Team Work) are equally prioritized. Harassment of any kind including sexual harassment is forbidden in the organization. The Sexual Harassment Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at the workplace and to provide the procedure for the Redressal of complaints pertaining to sexual harassment.

2. Scope and Coverage:

This Policy is applicable to all GHCL employees. "Employee" means any person on the rolls of the GHCL including, workers, interns, trainees, volunteers, probationers, contractual or otherwise including persons engaged on a casual basis or for project-based assignments and/or persons who are engaged through any third-party service providers (whether in the office premises or outside while on assignment), irrespective of their level, across all units/offices of GHCL.

The policy shall be considered to be a part of the employment contract or terms of engagement of the persons in the above categories.

Where the alleged incident occurs to any employee by a third party while on duty outside GHCL Premises, GHCL will perform all reasonable and necessary steps to support its employees & facilitate resolution.

3. Definitions:

i. What is Sexual Harassment?



Sexual harassment means such unwelcome sexually determined behaviours (whether directly or by implication) as:

- a) Physical contact and advances.
- b) A demand or request for sexual favours.
- c) Sexually coloured gestures, showing of pornography, lurid stares, stalking, offensive sounds
- d) Verbal harassment (oral or written) such as lewd comments, sexual jokes or references, sexually loaded messages (letters/emails/ SMSs/phone calls/WhatsApp, etc.), teasing, innuendos and taunts
- e) A demand or request for sexual favours, whether verbally or non-verbally, where the submission to such



conduct is made either explicitly or implicitly a term or condition of an individual's employment or promotion/ evaluation of work thereby denying an individual Equal Opportunity at Employment.

f) An act or conduct by a person in authority which creates an environment at the workplace hostile or intimidating to a person or unreasonably interferes with the individual's privacy and productivity at work.

g) Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

ii. Complaint Redressal Committee (Internal Committee): Refer to IC List.

4. Redressal/ Complaint Mechanism:

I. Any employee may lodge a written complaint of sexual harassment against any other employee to the Presiding Officer or to any member of the Internal Committee. Presiding Officer should be a Female. Also 50% & above will female in each IC list.

If the complainant is unable to make a complaint on account of his/her physical or mental incapacity, the complaint may be filed by:

a) A relative or friend; or

b) A co-worker; or

c) Any other legal heirs



II. All complaints will have to be sent in writing and will be dealt with in strict confidentiality by the Internal Committee members.

III. The complaints should be sent at the earliest, but within a maximum of 3 months from the date of occurrence of the alleged incident.

IV. The Presiding Officer of the Internal Committee shall, within 7 working days of the receipt of such complaint, personally meet or designate a member of the Committee to meet the employee who has made the complaint and record the statement made at such meeting. During this meeting the employee is also expected to present any collaborative material, documentary evidence to substantiate the complaint.

V. The person accused (respondent) to be called respondent and not accused till he/ she is found guilty will be informed that a complaint has been filed against him/ her (he/ she will be made aware of the details of the allegation and also the name of the complainant as it would be necessary for proper inquiry) and no unfair acts of retaliation or unethical action will be acceptable neither tolerated.

VI. The respondent shall file his/her reply to the complaint along with his/her list of documents, and names and addresses of witnesses, within a period not exceeding 10 working days from the date of receipt of the notice from the Internal Committee.

VII. The Internal Committee shall have the right to terminate the inquiry proceedings or to give an ex parte decision on the complaint, if the complainant or respondent fails, without sufficient cause, to present himself for three consecutive hearings convened by the Presiding officer, as the case may be. Provided that such termination or ex parte order may not be passed without giving a notice in writing, 15 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 Internal Committee.

IX. The Internal Committee will question both the complainant and the alleged respondent separately. If required,



the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.

- X. The Internal Committee shall call upon all witnesses mentioned by both parties and can ask for specific documents from any person if it feels that they are important for the purpose of the investigation.
- XI. Any employee who is a part of the investigations as a witness shall not be victimized or subjected to any unfavorable treatment.
- XII. The complainant and the accused shall be informed of the outcomes of the investigation. The investigation shall be completed within 3 Months (90 Days) of the receipt of the complaint. The report of the investigation would be supplied to the Management, the accused, and the complainant within 10 days of the completion of the investigation. If there is a very valid reason to extend the 90 days period it may be allowed subject to IC Approval
- XIII. In case the complaint of sexual harassment is proven to be true, the accused person may be subjected to strict disciplinary action by the Management, including transfers, withholding promotions and increments, or termination of employment.
- XIV. In case the complaint registered is found to be false and was made with malicious intention, the complainant will be liable to face strict disciplinary action by the Management.

5. Criminal Proceedings:

Where such conduct amounts to a specific offense under the Indian Penal Code or under any other law, GHCL shall support the victim in initiating appropriate action in accordance with the law with appropriate public authorities.

Note: This Policy has not been created to inhibit or prevent employees from being friendly and supportive to any colleague but is an effort to provide a safe and healthy working environment for employees and help them grow with GHCL.

1. CHANGE LOG

1.	Type of Document	Policy
2.	Prepared by CHRO	June 2023
3.	Approved by Managing Director	June 2023
4.	Reviewed by Managing Director	April 1, 2024
5.	Document Control	HR

For GHCL Limited


R S Jalan
Managing Director







POSH – Internal Complaint Committee Member 2024

Composition of Internal Complaint Committee for Corporate Office at Noida

Sr. No.	Name	Designation	Membership	Contact Details
1	Ms. Nehal Banthiya	Sr. Manager – F&A	Presiding Officer	9818665259
2	Ms. Deepika Abrol	General Manager - Corporate Communication	Member	9910882494
3	Ms. Nandita Sharma	Dy. General Manager – HR	Member	9899150928
4	Mr. Bhuwleshwar Prasad Mishra	Vice President - Company Secretary & Sustainability	Member	9971181155
5	Mr. BRD Krishnamoorthy	Legal Consultant	External Member	9810116495

Composition of Internal Complaint Committee Ahmedabad

Sr. No.	Name	Designation	Membership	Contact Details
1	Ms. Geeta Jaiswani	Asst. Manager – HR	Presiding Officer	8000189319
2	Ms. Rinal Upendrakumar Shah	Asst. Manager – Commercial	Member	7383009926
3	Ms. Sangeeta A. Upadhyay	Officer – Secretarial	Member	9099061578
4	Mr. Sunil Kumar Singh	Head of Marketing, Soda Ash	Member	9978989811
5	Mr. Sanjay Gupta	Sr. General Manager – Commercial	Member	9419167900
6	Mr. BRD Krishnamoorthy	Legal Consultant	External Member	9810116495

Composition of Internal Complaint Committee for Sutrapada

Sr. No.	Name	Designation	Membership	Contact Details
1	Ms. Siddhi Mehta	Manager – HR	Presiding Officer	9099093286
2	Ms. Khushboo Kumar	Dy. Manager - LS Mining	Member	9099093044
3	Mr. Amitendra Dwivedi	Asst. General Manager – HR & IR	Member	9099093062
4	Mr. Jeetendra B Gosain	Vice President – F&A and IT	Member	9662026369
5	Ms. Hiral Rathva	Assistant Manager– HR	Member	8469009155
6	Mr. BRD Krishnamoorthy	Legal Consultant	External Member	9810116495





Composition of Internal Complaint Committee for Bhavnagar

Sr. No.	Name	Designation	Membership	Contact Details
1	Ms. Khushboo Kumar	Dy. Manager - LS Mining	Presiding Member	9099093044
2	Mr. Dhananjay Kumar	Sr. General Manager – Lignite	Member	9824502802
3	Ms. Mita Vyas	Jr. Officer - Admin	Member	9924957575
4	Ms. Hiralben Sondabhai Dhandhika	Teacher- Education Project	Member	7048707676
5	Mr. BRD Krishnamoorthy	Legal Consultant	External Member	9810116495

Composition of Internal Complaint Committee for Port Victor

Sr. No.	Name	Designation	Membership	Contact Details
1	Ms. Khushboo Kumar	Dy. Manager - LS Mining	Presiding Member	9099093044
2	Mr. Janakray Vrajlal Joshi	Sr. General Manager - SMC	Member	9714994113
3	Ms. Hetalben Khaisya	Soft Skill Trainer	Member	9016885911
4	Ms. Aratiben Rajubhai Joshi	Team Leader- Education Project	Member	8140860308
5	Mr. BRD Krishnamoorthy	Legal Consultant	External Member	9810116495

Composition of Internal Complaint Committee for CPD

Sr. No.	Name	Designation	Membership	Contact Details
1	Ms. Subhasri Pillai	Sr. Executive – Accounts	Presiding Officer	9940775535
2	Ms. Saranya J	Jr. Officer - Marketing	Member	9710623731
3	Mr. Shalabh Agarwal	Head of CPD	Member	8108477744
4	Mr. Shreedhar M	Manager – HR	Member	9553393293
5	Ms. Krupa Sethuraman	NGO Association	External Member	8754580247

