



Policy on Sexual Harassment at Workplace

1. Objective

- 1.1. Gemini Edibles and Fats India Limited, is an equal opportunity employer and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore punishable.
- 1.2. The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

2. Applicability

- 2.1. This policy shall be applicable at all locations of Gemini Edibles & Fats India Limited.
- 2.2. The Board had adopted the policy at its meeting held on July 23, 2021.

3. Scope

- 3.1. This policy extends to all women / employees associated with Gemini Edibles & Fats India Limited, either directly or Indirectly, on-rolls or contractual, paid or unpaid, volunteers included.
- 3.2. Sexual harassment would mean and include any of the following:
 - 3.2.1. Unwelcome sexual advances, requests or demand for sexual favours, other verbal or physical conduct of a sexual nature, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
 - 3.2.2. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured 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 affect her / his performance.
 - 3.2.3. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy.



3.2.4. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex.

3.2.5. Conduct of such an act at work place or outside in relation to an employee of the Company, or vice versa during the course of employment; and

3.2.6. Any unwelcome gesture by an employee having sexual overtones.

3.3. "Employee" means a person employed at a workplace for any work on regular, temporary, adhoc 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

4. Internal Complaint Committee

Internal Complaints Committee ("ICC") has been constituted by the Management to consider and redress complaints of Sexual Harassment. Please note that except for locations in the state of Karnataka; and the plant at Kakinada & Krishnapatnam – all other location will be catered by the established IC in Hyderabad. Employees can reach out to any of the IC members at any location.

A quorum of **3 members is required** to be present for the inquiry proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

5. Redressal Process

5.1. Any employee who feels and is being sexually harassed directly or indirectly may submit a at least 6 copies of complaint of the alleged incident, to any member of the Committee in writing with her / his signature within a period of 3 months from the date of occurrence of the incident.

5.2. The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

5.3. The Committee will hold a meeting with the Complainant within five (5) days of the receipt of the complaint, but no later than a week in any case.

5.4. At the first meeting, the Committee members shall hear the Complainant and record her / his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc. to substantiate her / his complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer



for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

5.5. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to her / him to give an explanation, where after, an “Enquiry” shall be conducted and concluded.

5.6. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

5.7. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

5.8. The company has to provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force.

6. Enquiry Process

6.1. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

6.2. The Committee shall handover one of the copies received from the complainant to the respondent / the person against whom complaint has been made within a period of seven working days.

6.3. The respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents.

6.4. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

6.5. If the Complainant or the person against whom complaint is made, desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.

6.6. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the



Committee she/he shall supply original copies of such documents. Both shall affix her/his signature on the respective documents to certify these to be original copies.

6.7. The Complaints Committee shall make inquiry into the complaints in accordance with the principles of natural justice. And they shall call upon all witnesses as mentioned by both the parties.

6.8. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

6.9. The Complaints 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 herself or himself for three consecutive hearings convened by the Chairperson.

Provided that such termination or ex-parte order may not be passed without giving notice in writing, fifteen days in advance, to the party concerned.

6.10 The Committee shall complete the "Enquiry" within reasonable period but not beyond three (3) months from the date on which the written complaint is filed by the Complainant and communicate its findings and its recommendations for action to the HR Department of GEF (India). The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

The HR Department of the respective group company will direct appropriate action in accordance with the recommendation proposed by the Committee

The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

7. Other relief to complainant during pendency of inquiry

7.1. The Complaint Committee at the written request of the aggrieved woman may recommend to the employer to

7.1.1. Transfer the aggrieved woman or the respondent to any other workplace

7.1.2. Grant leave to the aggrieved woman up to a period of three months



7.1.3. Restrain respondent from reporting on the work performance of the aggrieved woman or writing her confidential report and assign the same to another officer

8. Manner of taking action for sexual harassment

8.1. On the completion of an inquiry, the ICC shall provide a report of its findings to the Management within a period of 10 days from date of completion of the inquiry

8.2. Where the ICC arrives at the conclusion that the allegation has not been proved, it shall recommend to the Management, that no action is required to be taken. If any person aggrieved from the recommendations or non-implementation of such recommendations

may prefer an appeal to the court or tribunal in accordance with the provisions of the service rules applicable to the said person or where no such service rules exist then, without prejudice to provisions contained in any other law for the time being in force, the person aggrieved may prefer an appeal in such manner as may be prescribed. The appeal shall be preferred within a period of ninety days of the recommendations.

8.3. Where the ICC arrives at a conclusion, that the allegation against the respondent has been proved, then it shall recommend to the Management, to take action as a misconduct in accordance with the provision of the service rules applicable to the respondent.

By Order of the Board
For **Gemini Edibles & Fats India Limited**

Pradeep Kumar Chowdhry
Managing Director

DIN: 01154121

Place: Hyderabad
Date: July 23, 2021