

**POLICY ON SEXUAL HARASSMENT OF EMPLOYEES
IN GOBIND SUGAR MILLS LIMITED**

I. COMMITMENT:

Our Company is committed to provide a work environment that ensures every woman associate or employee is treated with dignity and respect and afforded equitable treatment.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its women associates/visitors/employees are not subjected to any form of harassment at the workplace. The Company reiterates its commitment to providing its women employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

The workplace includes:

- All offices or other premises where the Company's business is conducted
- All company-related activities performed at any other site away (Corporate office)
- Any social, business or other functions (Events of company)

II. SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

III. DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature which may include:

- Unwelcome sexual advances (verbal, written or physical)
- Demand or request for sexual favours
- Any other type of sexually-oriented conduct, showing pornography
- Verbal abuse or 'joking' that is sex-oriented
- Any conduct that has the purpose/effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is explicit or implicit term or condition of employment and /or

submission or rejection of the conduct is used as a basis for making employment decisions.

III. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

- All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.
- All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

IV. COMPLAINT MECHANISM:

The Company currently does not have any Woman employee; therefore, provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 might not be applied verbatim. However, in view of company future prospects and interaction with third parties, it is hereby reiterated that company is fully committed to prevent and prohibit any kind of sexual harassments towards women employees or associates or visitors. In case of any concern, the Company shall not hesitate to matter to be referred to outside authorities and shall not interfere and offer full cooperation at that time.

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following three members:

1. Unit Head - HR (Chairperson)
2. HR head (Member)
3. Finance head (Member)

V. CONFIDENTIALITY:

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

VI. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.