

Lactose India Limited

At : Poicha (Rania), Tal Savli, Dist : Vadodara

Prevention of Sexual Harassment Policy

LIL/HRA/006

Lactose India Limited is committed to provide work environment that ensures every employee is treated dignity, respect and equitable treatment.

The need to introduce Prevention of Sexual Harassment Policy is to ensure that the employee and associate of Lactose are aligned to the basic moral and ethical ideology of the company to promote a work environment that is without fear of prejudice, gender bias and sexual harassment.

This policy has been framed in accordance with the provisions of “ The Sexual Harassment of Women at Workplace(Prevention, Prohibition and Redressal) Act 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

1. **Objective**

To ensure that Lactose employees, its associates and others acting on Lactose’ behalf are entitled to respectful treatment at the workplace. Being respected means being treated honestly and professionally, with their unique talents and prospective valued.

A respectful workplace is about more than compliance with the law. It is a working environment that is free of inappropriate behavior of all kinds and harassment because of age, disability, marital status, race or color, origin, religion, sex, sexual orientation or gender identity.

To educate all concerned that this policy should be about reporting only real issues as defined under the scope of policy.

To ensure that every employee is responsible for adherence to this policy and that Lactose provides a work place free of harassment and inappropriate behavior and those complaints are handled promptly as well as effectively.

2. **Scope and Coverage**

All employees i.e. probationers and permanent nature and also the trainees across the organization are covered under this policy.

3. **Applicability**

This policy will apply to the existing employees and who may join in future. It is applicable to all level of the organization.

4. Redressal Process

- To ensure prevention of sexual harassment, receive and deal with the complaints effectively, an Internal Committee is constituted in the company. The members of internal committee is notified as per Annexure I.
- Any female employee who feels and is being harassed directly or indirectly (hereinafter referred to as “the Complainant”) may submit a complain of the alleged incident to any member of the committee in writing with her signature with three months from the date of incident. The complainant may also register her complain in format as per Annexure II.
- The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is also desired, except to use the same for discreet investigation.
- The Committee will conduct a preliminary inquiry with the complainant within five working days from the receipt of complaint but no later than a week in any case.
- During preliminary inquiry committee member shall hear the complainant and record her allegations. The complainant can also submit any corroborate material with a documentary proof, oral or written material etc. to substantiate her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of incident, a female member of the committee for complainant shall meet and record the statement.
- Thereafter, the person against whom complaint (hereinafter referred to as “the Respondent”) is made may be called for a deposition before the committee and an opportunity will be given to him to give an explanation or provide any evidence as per act.
- The Presiding officer of the complaint committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complain fall under purview of sexual harassment or not preferably within 30 days from the receipt of complaint.
 - In the incident, the allegations does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be recorded with the reason thereof and the same will be communicated to the complainant.
 - In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary actions by the management.
 - If the presiding officer of the internal committee determines that the allegations constitute an act of sexual harassment, the committee shall immediately proceed with enquiry and communicate the same to the complainant and respondent.

5. Enquiry Process

- The committee shall prepare and hand over the allegation statements to the respondent and give him an opportunity to submit written justification within two working days from receipt of the same.
- The complainant shall be provided with a copy of the written explanation submitted by the respondent.
- If the complainant or respondent desires any witness/es to be called, they shall communicate in writing to the committee the names of witness/es.

- If the complainant desires to produce any documents by way of evidence before the committee, she shall submit original copies of documents with signature. Similarly, if the respondent desires to submit any evidence, he shall produce original documents with signature.
- The committee shall call upon all witnesses mentioned by both parties.
- The committee shall provide every reasonable opportunity to the complainant and respondent for putting forward and defending their respective cases.
- The committee shall complete the enquiry within a reasonable period of time but not beyond three months (from the date on which the enquiry is commenced) and communicate its findings & recommendations for further actions to the management. The finding report from the committee will be treated as an enquiry report on the basis on which an erring employee can be awarded appropriate punishment.
- The management will initiate appropriate action in accordance with the recommendation proposed by the internal committee and keep the complainant informed of the same. Corrective actions may include any of the following:
 - Formal Apology Letter
 - Counselling
 - Warning Letter
 - Change in service location as a punishment
 - Suspension
 - Termination
- In case the committee finds that the degree of offence is grave and likely to be covered under the Indian Penal Code (IPC) then this fact shall be mentioned in its report and appropriate action shall be initiated by the management for making a police complaint.

6. Confidentiality

The company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

As a part of the process the identity of the complainant and the witness/es (if any) will always be kept discreet/private/confidential.

All records of the complaint, including contents of meetings, result of investigation and other relevant material will be kept confidential by the company except where disclosure is required under disciplinary or other remedial processes.

7. Review and Amendment

Management shall review this policy periodically and amendments required, if any, shall be made accordingly.

8. Effective Date

This policy shall come into force with effect from 04th August 2023.

Annexure – I

Internal Committee

Sr. No.	Name	Designation
1	Ms. Sangita Maheshwari	Presiding Officer
2	Ms. Radha Pathak	Member
3	Ms. Seema Joshi	Member
4	Ms. Vrushali Patel	Member
5	Mr. Akash Bhatt	Member
6	Ms. Dimple Gaurav Brambhatt	External Member

Annexure – II

Sample format for register the complaint			
Complaint Format			
Date		Time	
Respondent Name			
Description of Incident			
Parties Working Relationship			

Prepared By	Approved By	Approved By
Bhavin Parmar	Mukesh Kapoor	Ranjit Kshirsagar
DGM – HR/IR	Director – Technical Operations	Chief Operating Officer
		