 <b>Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (POSH)</b>	Galaxy Surfactants Limited, Mumbai	
	Revision No	03
	Issue Date	01-02-2024
	Effective Date	01-02-2024
	Date of next review	31-01-2027

## 1. Applicability & Scope

This policy called as Prevention of Sexual Harassment (POSH Policy), is in compliance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 & the Rules and is applicable to all employees of Galaxy Surfactants Ltd deployed at the workplace who are either –

- a) On the rolls of the establishment both in India and abroad including its subsidiary companies and retainers. Local country laws will take precedence over this Policy in other geographies if applicable OR
- b) Engaged through Contractor(s) having service agreement with the establishment or as enumerated in section 2(f) of the Sexual Harassment of Women at Workplace (PPR) Act, 2013.

## 2. Objective

This policy has been formulated keeping in view primarily the provisions under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 & the Rules (hereinafter jointly referred to as SHWW Act). The said policy is to define the guidelines and the process to be followed for the prevention and redressal of complaints of sexual harassment at the workplace in addition to matters connected therewith or incidental thereto. For any doubt or further clarification, reference be made to the SHWW Act.

## 3. Preamble

Sexual harassment is not only a serious misconduct but criminal offence also, which can destroy human dignity and freedom. To promote the well-being of all women at the workplace, this Policy envisages as under:

- a) It shall be the duty of the Management of the establishment to prevent or deter the commission of any act of sexual harassment at the workplace.

- b) Sexual harassment will be considered as a misconduct and action will be taken based on the findings of the enquiry in this context.

#### 4. Definitions

In this Policy document, unless there is anything repugnant to the subject or content thereof, the words and expressions as stated below shall have the following meaning:

- a) **Complainant:** Refers to any woman, man and transgender who complains about being subjected to any act of sexual harassment by a person with whom they have work-based relationship at GSL.
- b) **Internal Complaint Committee (ICC):** Refers to the Presiding Officer, Internal members & external expert appointed as per the SHWW Act.
- c) **Management:** Management means Company's Managing Director or CEO who will authorize a representative, the Head PE to act on their behalf.
- d) **Respondent:** Refers to any person against whom the complainant has made a complaint alleging sexual harassment.
- e) **Workplace:** Refers to section 2(o) of the SHWW Act and includes all offices, branches, and workshops located anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment, where a person is present because of their work including transportation provided by the Management of the establishment for undertaking the journey or extended workplace, office parties, virtual workplace etc.
- f) **Sexual Harassment:** as defined in section 2(n) of SHWW Act includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
  - a. Physical contact and advances; or
  - b. A demand or request for sexual favors; or
  - c. Making sexually coloured remarks; or
  - d. Showing pornography; or
  - e. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.
- g) **The following circumstances,** among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment:
  - a. Implied or explicit promise of preferential treatment in her employment.

- b. Implied or explicit threat of detrimental treatment in her employment; or
- c. Implied or explicit threat about her present or future employment status; or
- d. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- e. Humiliating treatment is likely to affect her health or safety.

h) **Internal Complaint Committee (ICC) (Henceforth to be referred as 'IC')**: is being constituted as per section 4 of the SHWW Act.

- i. For each office of Galaxy Surfactants Limited, PE Head nominates the IC, location-wise for a period of 3 years through an order in writing.
- ii. IC to consist of at least 50% women members; a Presiding Officer who shall be a Senior woman manager, at least two member employees, 1 external expert.
- iii. Whenever there is a need, the Presiding Officer may co-opt IC members from another location for an enquiry.
- iv. IC members to ensure complete confidentiality, fairness and no retaliation, and proper documentation of all proceedings.
- v. Any leakage of information or violation of the policy by an IC member will attract penal provisions.
- vi. Internal committee to hold quarterly ICC meeting, to review previous quarter's activities and outcomes and recommend policy amendments or updates as required.
- vii. The members of the internal committee are mentioned in annexure B.

## **5. Procedure for filing a Complaint:**

- a) The complaint should be filed by an aggrieved woman by writing to:
  - I. [IC@galaxysurfactants.com](mailto:IC@galaxysurfactants.com) or respective location ids as mentioned below:
  - II. [ICTaloja@galaxysurfactants.com](mailto:ICTaloja@galaxysurfactants.com)
  - III. [ICTTCMBP@galaxysurfactants.com](mailto:ICTTCMBP@galaxysurfactants.com)
  - IV. [ICTarapur@galaxysurfactants.com](mailto:ICTarapur@galaxysurfactants.com)
  - V. [ICJhagadia@galaxysurfactants.com](mailto:ICJhagadia@galaxysurfactants.com)
  - VI. The Complainant's reporting manager
  - VII. People Energy Process

- b) The complaint by an aggrieved woman employee shall be made to IC in writing. Any verbal complaint must be reduced to writing before being accepted by the IC and be sent either by email or given in person to the IC.
- c) The complaint should be made by an aggrieved woman within a period of three months from the date of occurrence of last harassing incident. The IC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.
- d) Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, a complaint may be filed by-
  - I. her relative or friend; or
  - II. her co-worker; or
  - III. an officer of the National Commission for Woman or State Women's Commission; or
  - IV. any person who has knowledge of the incident, with the written consent of the aggrieved woman.
  - V. any person who has knowledge of the incident jointly with her relative or friend or a special educator or a qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
- e) The Complaint by an aggrieved man and transgender shall be addressed and redressed by the People Energy Process. Any verbal complaint must be reduced to writing before being accepted by the People Energy Process and be sent either by mail or given in person to the People Energy Process.

#### **6. Procedure to be followed post receipt of Complaint:**

- a) The Presiding Officer would go through the details of the complaint and evaluate if there is a prima facie case or not.
- b) If the complaint does not fall under the purview of the sexual harassment or the complaint does not mean an offense of sexual harassment, then the reasons for the same will be recorded and the complaint would be closed.
- c) If the prima facie case is established, IC will send a copy of the complaint received to the respondent within 7 days of receipt.
- d) If the Complainant requests for a conciliation, the IC may take steps to settle the matter between her

and the Respondent, provided that no monetary settlement shall be made as basis of conciliation.

Where a settlement has been arrived at during conciliation, the IC shall record the settlement and forward it to the employer.

However, if the terms arrived at during conciliation have not been complied with by the Respondent, the IC shall proceed to make an enquiry into the complaint, or the case shall forward the complaint to the police. The copies of the settlement as recorded during conciliation shall be provided to both the parties.

- e) In case no settlement is arrived at, the IC shall, where the Respondent is an employee, proceed to make an enquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent. If a prima facie case exists, forward the complaint to the police, within a period of seven days for registering the case under relevant section of the Indian Penal Code (45 of 1860), where applicable.
- f) Where both the parties are employees, the parties shall, during the course of enquiry, 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.
- g) The IC shall complete the enquiry within 90 working days from the date of receipt of the complaint, write its report within 10 working days of the last interview and submit its recommendations for corrective actions to the Management.

The corrective action may include the following:

- I. Formal Apology
  - II. Counselling
  - III. Written warning to the respondent and a copy of it to be maintained in the employee's file.
  - IV. Change of work assignment/ transfer of either the respondent or the complainant.
  - V. Suspension/ Termination of services of the employee found guilty of the offence.
  - VI. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- h) The Management shall submit an Action Taken Report to the IC after taking action.
  - i) Notwithstanding anything contained in the Indian Penal Code (45 of 1860), the IC may, when allegation/s against the respondent are proved, order payment of such sums as it may consider appropriate to the aggrieved woman by the respondent, having regard to the provisions of section

15 of SHWW Act pertaining to determination of compensation.

PE Process will extend full cooperation to IC in facilitating to conduct the proceedings.

- j) For making an enquiry under sub-section (1), the Internal Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:
  - I. summoning and enforcing the attendance of any person and examining them on oath
  - II. requiring the discovery and production of documents; and any other matter which may be prescribed.

*(For more information, refer to the process flow, mentioned in Annexure A)*

## **7. Guidelines to be kept in mind by IC while recommending action:**

- a) To conduct the enquiry as per the Principles of Natural Justice and in a confidential manner.
- b) Where the IC arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or the Complainant has produced forged or misleading document, it may recommend to the Management of the establishment to take action against the Complainant as stipulated by section 14 of the SHWW Act.

Where the IC arrives at a conclusion, during the enquiry, that any witness has given false evidence or produced any forged or misleading document, it may recommend the Management to take appropriate action.

## **Employer (Management) to ensure:**

- a) That in case there is a complaint against any of the IC members; such complaints can be routed through Head-People Energy Process, who will oversee it appropriately thereafter without involving the said IC member or reconstituting the IC. In all such cases the guidelines as defined in the above clauses would be inclusive of the time taken to reconstitute the said committee.
- b) In cases, where the IC has recommended to Management for compensation to be made to the Complainant, then the said amount shall be deducted from the salary of the Respondent and paid to the Complainant or her legal heir/s.
- c) The Management will provide assistance to the Complainant, if she so chooses to file a police complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.

- d) The Management will also initiate action under the Indian Penal Code or any other law for the time being in force, against a perpetrator, where the perpetrator is not an employee of the establishment and there is complaint of Sexual Harassment against the said perpetrator in the workplace where the harassment took place.
- e) The IC will submit an annual report to the management and District Officer as outlined in the SHWW Act and management shall include such information in its Annual Report.
- f) The Management shall display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee under sub-section (1) of section.
- g) The Management shall organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation programs for the members of the Internal Committee
- h) The Management will assist in ensuring the attendance of the Complainant, Respondent, witness & other parties before the IC.
- i) The Management will monitor the timely submission of reports by the Internal Committee. For this, the Management will conduct periodic update meetings with the IC and PE Process to ensure that the said policy is being implemented in letter and spirit.
- a) **Appeal by the aggrieved person**

Any person aggrieved from the findings or recommendations made by the IC, or the process followed by IC, especially if violative of the written policy or principles of natural justice, or aggrieved because of the action taken by the management, can file an appeal within 90 days of the recommendations being passed. If allegations against the respondent have not been proved, or the IC arrived at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading documents or has leaked information related to the enquiry contravening section 17 of the SHWW Act may prefer an appeal to-

- I. The Managing Director of GSL
- II. 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.

The appeal will lie before the Appellate Authority notified under clause (a) of section 2 of the Industrial Employment (Standing Orders) Act, 1946.

**Note:** It is pertinent to state here that the Standing Orders are not invariably applicable to all the establishments since these apply mainly to the industrial establishments and, as such, it would be appropriate for the Management to notify as to who will be the Appellate Authority in the absence of Standing Orders.

- b) Till the time there is no separate policy with respect to Sexual Harassment in new subsidiaries of Galaxy, IC of GSL will oversee such cases. All employees will also have access to the international Toll-free number **1-800-229-970** to register their complaints.
- c) Employees found in violation of this policy will be subject to disciplinary action up to and including termination. The Company reserves the right to make decisions in the best interest of the organization including reassignment, transfer, or separating employees where appropriate.

## **8.Evaluation:**

The policy shall be evaluated so that any amendments required may be recommended by the POSH Committee based on their experience or amendments in law.



**K. Natarajan**  
**Managing Director & CEO**



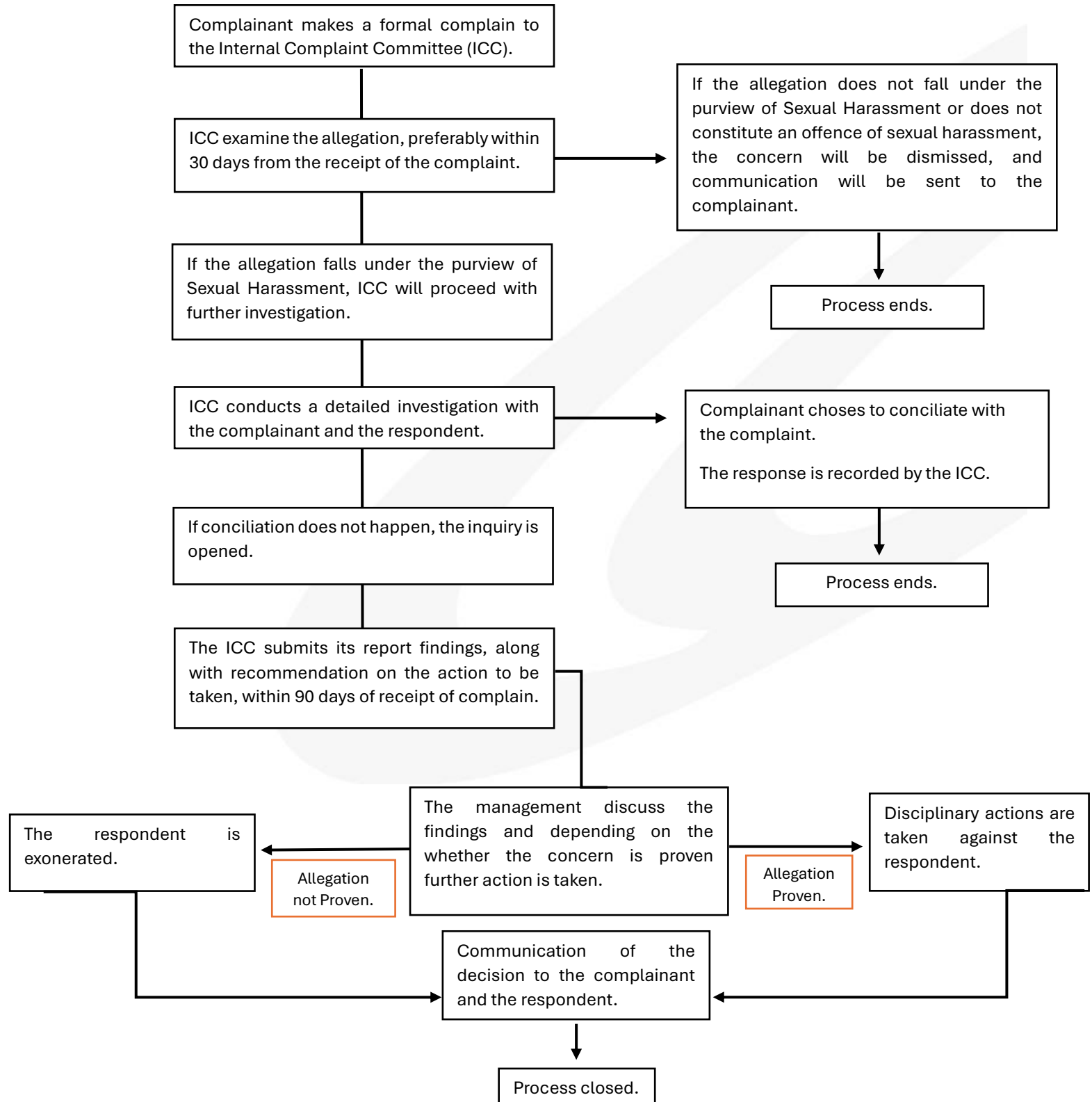
**Vaijanath Kulkarni**  
**Executive Director & COO**

**Review Date: 01.01.2027**  
**Revision No.: 03**



## **ANNEXURE A**

### **Process Flow**



**ANNEXURE B**  
**Internal Committee Members at Galaxy Surfactants.**

SR	MEMBERS	TTC & MBP	TALOJA	TARAPUR	JHAGADIA
1	Presiding Officer	Monisha Mohanlal	Monisha Mohanlal	Monisha Mohanlal	Monisha Mohanlal
2	Core Member	Anand Gurav	Anand Gurav	Anand Gurav	Anand Gurav
3	External Expert	Supriti*	Supriti*	Supriti*	Supriti*
4	Location Member	Poorna Subramanian	Sham Sundar Gawade	Sandeep Raut	Mangesh Vishwakarma
5	Location Member	Pradnya Katdare	Shraddha Ratnaparkhe	Yashika Poddar	Rumanah Patel
6	Location Member	-	Amruta Ranade	-	-

\*External committee member



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