



**THIRUMALAI CHEMICALS LIMITED**

## **PREVENTION OF SEXUAL HARASSMENT POLICY (POSH)**

Thirumalai Chemicals Ltd. is committed to providing a workplace that is free of sexual harassment, where all employees are treated with dignity. All employees are expected to create and maintain a work environment that is respectful of all persons in it.

### **PURPOSE**

The purpose of the Prevention of Sexual Harassment Policy is to;

- Prohibit any form of sexual harassment in the way employees behave with each other
- To provide for an effective complaint redressal mechanism in case of an occurrence of sexual harassment.

### **SCOPE**

The policy shall apply to all the employees of Thirumalai Chemicals Limited (both On-roll and Outsourced), irrespective of their level, across all offices and locations of the Company. This applies equally to relations between superior and subordinates as well as between peers.

"Sexual Harassment" shall include but not be restricted to:

Any unwelcome sexually motivated behaviour, whether directly or by implication such as;

- Physical contact and advances
- A demand or request for sexual favours
- Sexually coloured remarks
- Showing Pornography, writing sexually loaded letters / emails / SMS
- Making sexually loaded phone calls communicating conduct which is un welcome
- And / or any other unwelcome physical, verbal or non-verbal conduct of sexual nature

### **REDRESSAL**

Any incident of sexual harassment will be viewed as extremely serious. A complaint or report of sexual harassment will be immediately investigated and appropriate action will be taken against the offending employee or employees. Such action will depend on the nature and seriousness of the offense and will include strict disciplinary action including termination of service.

## COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT

The company has established a Complaints Committee for Sexual Harassment headed by Ms. Sunitha Prasad - HR and consisting of five other members. The names of the members of this Committee and their contact details are given below:

S. No	Name	Contact details
1	Ms. J Radha – EVP Finance	<a href="mailto:Radha.j@thirumalaichemicals.com">Radha.j@thirumalaichemicals.com</a>
2	Ms. B. K. Bama – Training	<a href="mailto:Bama.bk@thirumalaichemicals.com">Bama.bk@thirumalaichemicals.com</a>
3	Ms. K. Punidha – QA	<a href="mailto:Pundiha.k@thirumalaichemicals.com">Pundiha.k@thirumalaichemicals.com</a>
4	Mr. Venkat – President – Food ingredients	<a href="mailto:Venkat.s@thirumalaichemicals.com">Venkat.s@thirumalaichemicals.com</a>
5	Mr. N.R. Vijayakumar	<a href="mailto:nrvijayakumar@thirumalaichemicals.com">nrvijayakumar@thirumalaichemicals.com</a>
6	Ms. Radhika, Advocate, External member	-

The Committee may seek the advice of a third party who it feels will be able to provide special assistance to the Committee in dealing with such issues.

The Committee shall meet once in every quarter and/or as and when a complaint is received. Committee shall prepare an Annual report in each calendar year and submit the same to the CEO. The committee will be reconstituted once in three years.

## COMPLAINTS HANDLING PROCESS

Any employee who experiences sexual harassment can get in touch with any member of the Complaints Committee for Sexual Harassment, whose contact details are provided above for convenient and confidential access. Alternatively, the affected employee may approach any senior executive and such senior executive will be expected to inform a member of the Committee immediately. All such complaints shall be in writing with full details of the incident.

The complaints should be sent at the earliest, but preferably within 30 days from the date of occurrence of the alleged incident. On receipt of such a complaint, the Committee will immediately arrange to fully investigate all relevant details of the matter. It will do so with all possible care, sensitivity and discretion in protecting the sensibilities of the affected employee. The employee or employees, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the Committee. The committee will act as per the rules given in the Annexure - Thirumalai Chemicals Ltd, Internal complaints committee.

Necessary action will then be taken with regard to the offending employee or employees based on the circumstances and seriousness of the offence, which includes:

- a) Warning
- b) Suspension
- c) Penalty
- d) Termination
- e) Legal Proceedings

Where the Company is legally advised that any such incident constitutes a criminal offence, the Company will inform the relevant authority, provide full details and request appropriate

action. If the aggrieved employee directly takes any action, against the offending employee, either civil or criminal, the Committee, on becoming aware of such action by the aggrieved employee, shall be entitled to, Suo motu, start the internal enquiry / investigation and recommend appropriate action. The Company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.

In order to ensure that this important matter is not trivialized, any complaint which, in the opinion of the Committee, is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the company and appropriate action taken against such complainants.

If the Committee receives an anonymous reference related to sexual harassment. it will draw the attention of the senior executives concerned with the relevant business or location. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee.

Heads of departments and senior executives at all company locations will also be expected to be sensitive to any circumstances or behaviour among their colleagues which appear to go against the company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.

## **GENERAL**

This policy will be reviewed on a periodic basis to ensure the effectiveness of the policy.