

Aarti Surfactants Limited

Policy on Prevention of Sexual Harassment at Workplace

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This amended Policy is effective from January 19, 2026.

1. Introduction

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 the rules framed thereunder (hereinafter referred to as "the Act"). While the policy covers all key aspects of the Act, in case of any further clarification, reference shall always be made to the Act, whose provisions shall prevail.

Sexual harassment violates the fundamental rights of women to equality under Articles 14 and 15 of the Constitution of India, the right to live with dignity under Article 21, and the right to practice any profession or carry on any occupation, trade, or business, which includes the right to a safe working environment free from harassment.

At Aarti Surfactants Limited (ASL), we are committed to providing a work environment that is safe and healthy, enabling employees to work without fear of prejudice, harassment, or any form of intimidation. ASL ensures that every employee is treated with dignity and respect and receives equitable treatment. Sexual harassment is deemed gross misconduct under service rules and applicable laws, and ASL is committed to taking appropriate action to address such behavior.

This policy specifically aims to protect women at the workplace from sexual harassment, ensuring the prevention and redressal of complaints related to such misconduct. It reflects ASL's commitment to fostering a workplace culture where employees feel safe, respected, and free from discrimination or violence.

2. Scope

This Policy shall deal with all allegations/complaint(s) of Sexual Harassment committed by an Employee(s), irrespective of whether Sexual Harassment is alleged to have taken place within or outside the Company premises but that constitutes workplace. All Complaints in connection with alleged Sexual Harassment will be addressed in compliance and in accordance with the provisions of Sexual Harassment at workplace (Prevention, Prohibitions and Redressal) Act 2013.

3. Definitions

- 3.1. **Aggrieved Person** means the employee(s) who alleges to have been subjected to any act of sexual harassment, in any of the form mentioned in clause 3.8, by the respondent.
- 3.2. **Complainant** means aggrieved person as defined in clause 3.1;
- 3.3. **employee** means a person employed at a workplace for any work on regular, temporary, ad hoc 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 co-worker, a contract worker,

probationer, trainee, apprentice or called by any other such name;

- 3.4. **employer** means Aarti Surfactants Limited ("**the Company**");
- 3.5. **Internal Committee** means an Internal Complaints Committee constituted under this Act;
- 3.6. **Mala Fide Complaints** means the fraudulent deception, and/or the act of intentionally misleading a person/a thing, and/or providing false statement/facts/documents or any other proof related to the act of harassment, to the Committee during the investigation;
- 3.7. **respondent** means a person against whom the aggrieved person has made a complaint;
- 3.8. **sexual harassment** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -
 - (i) physical contact and advances; or
 - (ii) a demand or request for sexual favours; or
 - (iii) making sexually coloured remarks; or
 - (iv) showing pornography; or
 - (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- implied or explicit promise of preferential treatment in her employment; or
- implied or explicit threat of detrimental treatment in her employment; or
- implied or explicit threat about her present or future employment status; or
- interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- humiliating treatment likely to affect her health or safety.

Note: All acts of sexual harassment by an employee of the company at the workplace, to a woman who may or may not be an employee of the company would come within the meaning of Sexual Harassment of Women within the meaning of this policy.

Types of Sexual Harassment

- 3.8.1. **Quid pro quo:** means "something for something." In the context of workplace harassment, it refers to situations where someone in a position of power demands sexual favors in exchange for workplace benefits or protection from negative consequences. This form of harassment involves exploiting authority to coerce employees, making job security, promotions, or other work-related advancements contingent on compliance with inappropriate demands.

Few Examples of Quid Pro Quo Sexual Harassment but not limited to:

- Threatening job loss if sexual advances are rejected.
- Offering promotions, better ratings, or increments in exchange for sexual favors.
- A hiring manager promising a job in return for sexual advances.

3.8.2. **Hostile Work Environment:** A hostile work environment is created through behaviors that make the workplace intimidating, unsafe, or offensive. This may include verbal, non-verbal, or physical misconduct.

Examples:

- Unwelcome comments about body type or physical appearance.
- Touching someone's clothing or body intentionally.
- Sharing obscene jokes, sexually suggestive materials, or inappropriate gestures.
- Staring, stalking, or using technology to harass, such as sending unwelcome texts or images.

3.8.3. **Virtual Sexual Harassment:** With the shift to virtual workspaces, maintaining professionalism during online interactions is critical.

Do's:

- Dress professionally for video calls.
- Content of Conversation: Keep discussions work-related, focusing on tasks and deliverables.

Don'ts:

- Avoid wearing inappropriate attire such as vests, shorts, or suggestive T-shirts during video calls.
- Ensure the background is free of inappropriate or suggestive content.
- Refrain from making inappropriate jokes.
- Managers should avoid insisting on unnecessary one-on-one video calls and must ensure professional conduct at all times.
- Avoid scheduling late-night video calls unless it's an emergency, in which case "audio-only" is preferred.

3.9. **Workplace:** In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place where the aggrieved person or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with ASL, including transportation provided for undertaking such a journey.

4. Policy Statement

- 4.1. All employees will maintain high standards of dignity, respect, and positive regard for one another and with all those to whom this policy is applicable, in all their dealings.
- 4.2. All employees will understand and appreciate the rights of the individual to be treated with dignity.
- 4.3. All employees are required to maintain a work environment, which is free from any kind of harassment.
- 4.4. Employees will refrain from committing any acts of sexual harassment at workplace.
- 4.5. Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- 4.6. Employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

5. Internal Complaints Committee

- 5.1. In compliance with the Act, if the complainant's warrants formal intervention, the complainant needs to lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this Policy. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained.
- 5.2. To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an **"Internal Complaints Committee"** is constituted.

The Internal Committee shall comprise of as many members as the management may nominate from time to time, provided that at least one-half of the total number of Members shall be women.

The present Members of the Internal Committee shall comprise of the following:

- (i) One Presiding Officer who shall be a senior level woman employee of the Company;
- (ii) Two employee members preferably committed to the cause of women or who have experience in social work or have legal knowledge;
- (iii) One outside member from amongst Non-Government Organization or Association committed to the cause of women or a person familiar with the issues relating to sexual harassment, whose fee shall be fixed by the management and revised from time to time.

- (iv) Each member of the Internal Complaints Committee shall hold the position for three (3) years from the date of nomination.
- (v) The Presiding Officer or the members can be removed from the Internal Committee due to contravention of any of the provision of the Act or other disqualifications as defined in the Act:

Details of the members of the Committee are provided in “**Annexure A**” of the policy.

The Board of Directors may re-constitute the Internal Committee as may be required from time to time, within the stipulated requirements under the Act.

The Internal Committee shall prepare an Annual Report as required under Section 21 of the Act and Rule 14 of the POSH Rules, 2013, and submit the same to the Company, which shall include the details in the Board’s Report.

5.3. The Internal Committee will be responsible for:

- Addressing every formal written complaint of sexual harassment.
- Taking appropriate actions to respond to any substantiated allegations of sexual harassment.
- Investigating and assessing the details of the discussions with the complainant, witness & respondent.
- Recommending action based on the findings, as stated within the relevant Policy or Service Rules, which may include a warning to terminate.
- Discouraging and preventing employment-related sexual harassment.

6. Lodging a Complaint

Any person who feels being subjected to sexual harassment by anyone, should:

- 6.1. Tell the offender that his/her behaviour is unsolicited and unwelcome. Ask the offender to stop immediately. If an employee wants to file a complaint at this stage, the employee may choose to do so.
- 6.2. Whenever an incident of sexual harassment occurs, the employee (Complainant) shall, in writing, report the complaint within a period of 3 months from the date of incident and in the case of a series of incidents within 3 months from the date of last incident, to the Internal Complaints Committee on email at aishwarya.pillai@aarti-surfactants.com or speak to any of the Committee members.
- 6.3. In a case, where the aggrieved employee can't give the complaint in writing, the Presiding Officer or any member of the Committee shall render help to the aggrieved employee.

6.4. In such a case, wherein the aggrieved employee on account of the physical or mental incapacity or death or otherwise, can't make the complaint, the legal heir or any such person may make the complaint.

6.4.1. **Any such person** may include; a friend, relative, co-worker, or any other person who has knowledge about the incident that has taken place.

6.5. The Complainant shall make sure to include the following in the written complaint:

6.5.1. Date, time and location of the Incident

6.5.2. The name of the respondent, with the designation and phone no.

6.5.3. Detailed description of the incident

6.5.4. Names of witnesses with their phone no.

6.5.5. Procure any physical/ documentary proof related to the incident

6.5.6. Aggrieved employee shall sign the complaint letter with date

7. **Complaint Redressal Procedure**

After the complaint is received with the required details as mentioned in clause 6.5, the Internal Complaints Committee will conduct the investigation with immediate effect.

7.1. The Internal Complaints Committee before initiating inquiry and at the request of the aggrieved employee, may take steps to settle the matter between the complainant and the respondent through conciliation. Provided no monetary settlement shall be made as a basis of conciliation.

7.2. If the settlement is arrived at this stage, the Committee shall record the settlement so arrived and forward the same to the employer. Copies of the settlement to be sent to the aggrieved employee and the respondent. The Committee will conduct no further inquiry in this case.

7.3. If there is no conciliation possible, then the Committee shall immediately proceed with the inquiry and communicate the same to the aggrieved employee and the respondent.

7.4. The Committee shall prepare a Statement of the Allegation and give it to the respondent, to provide the respondent an opportunity to give a written explanation within 10 working days.

7.5. The aggrieved employee shall be provided with a copy of the Statement of Allegation that the respondent has filled up.

7.6. If the respondent desires to call any witness, he/she shall communicate in writing to the Committee, by mentioning the names of the witness(es) in the explanation statement.

- 7.7. If the aggrieved employee and respondent desire to produce any physical document as evidence, they must attach the copies in their respective statements.
- 7.8. The Committee shall call upon the witnesses for inquiry and shall also go through the documents provided by the aggrieved employee and respondent.
- 7.9. During the pendency of an inquiry on a written request made by the aggrieved employee, the Internal Committee may recommend to the employer to:
 - 7.9.1. Transfer the aggrieved employee or the respondent to any other workplace or department or
 - 7.9.2. Grant leave to the aggrieved employee up to a period of three months
- 7.10. If the aggrieved employee is experiencing **retaliation** of the nature of intimidation, pressure to withdraw the case or threats for reporting, then such a case shall be immediately be brought to the Committee's notice.
- 7.11. If the aggrieved employee or the respondent provide **mala fide complaints / statements** (respectively), then such a behaviour shall be treated as misconduct, and the person giving mala fide complaints shall face disciplinary action.
- 7.12. The Committee shall hear both the parties, giving a chance to the aggrieved employee to present the case and giving a chance to the respondent to defend himself/ herself.
- 7.13. The Committee shall complete the inquiry within a period of 90 days from receipt of the complaint and submit its report to the employer within 10 days. The employer shall act upon the recommendations within 60 days
- 7.14. The Committee shall prepare a report of all the findings of the investigation after assessing the completeness of the information. Based on the findings the Committee shall recommend if the allegation / Complaint made by the complainant should be upheld or not upheld.
- 7.15. In cases where the Complaints Committee upholds the Complaint, it may recommend appropriate actions specified in clause 8.1.
- 7.16. The Committee shall communicate the findings of the case in the form of a Report to the employer or any other competent authority. The Report will have the appropriate recommended action as decided by the Complaints Committee.
- 7.17. The Report of the Committee shall be treated as an Inquiry Report on the basis of which a delinquent employee shall be given appropriate punishment by the Competent

Authority of the Company. The Competent authority will act on the report of the Committee in accordance with the Company Rules.

8. Any person aggrieved by the recommendations of the Internal Committee may prefer an appeal to the appropriate authority in accordance with the service rules applicable, or as notified under Section 18 of the Act, within 90 days. Manner for taking action for Sexual Harassment

8.1. *In case of allegation proved:* Internal Complaint Committee, bases on its investigation and findings arrived at the conclusion that the allegation against the respondent has been proved. It shall recommend to the employer to take any action against the respondent including:

- (i) Written apology
- (ii) Warning letter
- (iii) Withholding of promotion
- (iv) Withholding of pay rise or increments
- (v) Deduction from salary
- (vi) Termination from service
- (vii) Financial Penalty (In accordance with the mental, physical trauma, loss of career opportunity, medical expenses) in lump sum or in instalments
- (viii) Undergoing a counselling session
- (ix) Transfer to another workplace

If the complaint is of a serious nature, involving threats of reprisal or risk of recurrence or refusing the order/judgment of the employer, then a criminal case shall be filed against him/her before the police/court at the discretion of the Complaint Committee.

8.2. *In case of allegation not proved:* Where the allegations against the respondent have not been proved, the Internal Complaint Committee shall provide a report to the employer with recommendation that no action is required, and the copy of the report will be provided to respondent and aggrieved person.

9. Responsibilities of the Management:

- 9.1. The management shall treat sexual harassment as a gross and unacceptable misconduct under the disciplinary policy and act for such misconduct.
- 9.2. The management shall undertake necessary awareness program and preventive measures against sexual harassment of women at workplace.

These would include:

- (i) Display at any conspicuous place in the workplace a copy of this policy.
- (ii) Organize periodical workshops and awareness programs at regular intervals for sensitizing the employees as required under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act,

2013 and any other relevant awareness and training programs for women employees.

- (iii) Organize regular specialized orientation programs for the members of the Internal Committee for dealing with the cases of sexual harassment.
- (iv) Provide necessary assistance and facilities to the Internal Committee to deal with the complaint and for conducting inquiry.
- (v) Make available such information to the Internal Committee as may be required having regard to the complaint received.
- (vi) Provide support to the Complainant if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
- (vii) No. of complaints received and disposed off.

10. Responsibilities of the Employees:

- 10.1. It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:
 - (i) Refusing to participate in any activity which constitutes harassment
 - (ii) Supporting the person to reject unwelcome behavior
 - (iii) Acting as a witness if the person being harassed decides to lodge a complaint

All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the person behaving inappropriately, the opportunity to modify or stop their offensive behavior.

- 10.2. All employees of the Company have a personal responsibility to ensure that they have read the policy document and adhere to the same.

11. Other Important Points

11.1. Confidentiality

The Company understands that it is difficult for the victim to come forward and file a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential at all times. The details of the complaint, inquiry and proceedings shall not be published, communicated or made known to other employees, press, media by the witnesses, Committee, complainant and all other people involved in the case and proceedings.

Any breach of confidentiality shall be punishable in accordance with Section 17 of the Act

11.2. Protection Against Retaliation

The Company will not allow retaliation against anyone who files a complaint of sexual harassment, cooperated in inquiry or who speaks as a witness in the investigation procedure. The company will take appropriate measures to make sure the complainant or the witnesses are not victimised. Strict action will be against the respondent if the incident of retaliation is found to be genuine.

11.3. Monitoring and Evaluation

11.3.1. We recognize the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

11.4. Implementation of this policy and awareness

11.4.1. The HR function will ensure that this policy is widely disseminated to all relevant persons. It will be included in the employee handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

11.4.2. Every year, we will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every leader to ensure that all his/her employees are aware of the policy.

11.4.3. Awareness sessions of this policy shall be organized by the periodically.

12. False or Malicious Complaints

In case the Committee arrives at the conclusion that the allegation was false, or false/forged evidence, misleading documents have been provided by the complainant or witness(es), appropriate disciplinary action will be taken as advised by the Committee.

13. Conclusion

In conclusion, the Company reiterates its unwavering commitment to fostering a workplace that is free from harassment and discrimination, where every employee is treated with dignity, respect, and fairness.

14. Confidentiality

All matters relating to a complaint under this Policy shall be treated as strictly confidential. Disclosure of the complaint, identities of the parties or witnesses, or details of conciliation or inquiry proceedings is prohibited, except as required under law. Any person found in breach of confidentiality obligations shall be liable for disciplinary action as per law and the Company's policies.

In cases where a complaint is lodged with the police or proceedings are initiated under the Indian Penal Code, the matter may enter the public domain as part of judicial proceedings. However, the confidentiality of the identity and address of the aggrieved person, respondent, and witnesses shall continue to be protected, and no disclosure thereof shall be made to the public, press, or media by any person privy to such information.

ANNEXURE A

Internal Complaints Committee (ICC) for Corporate Office, situated at Unit No. 202, 2nd Floor, Udyog Kshetra, CTS NO 731 B Mulund Goregaon Link Road, Mulund West, Mumbai Suburban, Maharashtra - 400 080

Name	Responsibility	Email- id
Mrs. Kanika Rathore	Presiding Officer	kanika.rathore@aarti-surfactants.com
Mrs. Priyanka Chaurasia	Internal Member	priyanka.chaurasia@aarti-surfactants.com
Mrs. Aishwarya Pillai	Internal Member	aishwarya.pillai@aarti-surfactants.com
Mrs. Amrita Patil Pimpale	Member (External Expert)	amrita.p@echoinghealthyageing.com

**Each unit of Aarti Surfactants Limited has a duly constituted Internal Complaints Committee (ICC), details of which can be obtained by any person by writing to any of the above-mentioned ICC member.*