



CRYSTAL CROP PROTECTION LIMITED

Policy on Prevention of Sexual Harassment of women at workplace





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POLICY ON PREVENTION OF SEXUAL HARASSMENT(POSH) OF WOMEN AT WORKPLACE

1. INTRODUCTION:

Crystal Crop Protection Limited (“Company” or “Crystal”) is committed to creating and maintaining a secure work environment where it’s Employees, Agents, Vendors and Partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Workplace Sexual Harassment as defined vide The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder (“Act”) within but not limited to the office a premises and other locations directly related to the Company’s business.

“Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and cultured people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.”

- *The Crystal Crop Business Principles*

At Crystal, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

All concerned should take cognizance of the fact that Crystal strongly opposes any act that might construe as an act of sexual harassment, and that such behavior against women is prohibited by the law as set down in the Act as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

2. OBJECTIVE:

The objective of S Policy on Prevention of Sexual Harassment of women at workplace of Crystal (“the Policy”) is to provide protection against acts that construe as actions of sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

3. SCOPE:

The Policy covers every “employee” across the Company, whether such employee is employed directly by the Company or is working in designated business premises. The Company encourages





every employee (the act only covers women employee), who believes she has been sexually harassed to use the “Procedure for dealing with Complaints” as provided in this policy.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company’s offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment in course of discharging professional duties for the company. This Policy includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsourced employees.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender. (the act limits it to the women employees only however, the company can form a separate and parallel system which cannot be covered under this policy). The act also does not cover acts of same gender scenarios whether such scenarios arise between two females. These points need to be covered through separate HR systems.

4. PREVENTION OF SEXUAL HARASSMENT

- 1) No employee shall be subjected to sexual harassment at any designated workplace.
- 2) 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:-
 - i) implied or explicit promise of preferential treatment in her employment; or
 - ii) implied or explicit threat of detrimental treatment in her employment; or
 - iii) implied or explicit threat about her present or future employment status; or
 - iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
 - v) humiliating treatment likely to affect her health or safety.

5. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of “Internal Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the Aggrieved. 5.1 Internal Complaints Committee (ICC):

a. The Internal Complaints Committee will comprise of the following:

- a) Presiding Officer - Shall be a woman employed at a senior level at workplace amongst the employees.





- b) Two members - Shall be amongst employees preferably committed to the cause of woman or who have an experience in social work or have legal knowledge.
- c) One Member - amongst Non-Governmental Organizations or associations or person committed to cause of woman or a person familiar with the issues relating to sexual harassment as defined vide Section 4 of the Notified Rules (GSR 769 E),

Provided that at least one half of the total Members so nominated shall be women.

The Company has instituted an ICC for redressal of sexual harassment complaint (made by the Aggrieved) and for ensuring time bound treatment of such complaints.

The present composition of the ICC is provided in Annexure A. Additional members will be added as may be required from time to time. The nomination will be made by the management committee and reviewed and approved by the Audit Committee. At least 50% of the ICC shall be constituted by persons drawn from departments other than the Human Resources department of the Company.

The Presiding Officer and every member of ICC shall hold office for a period not exceeding 3 years from the date of their nomination. The Presiding Officer and other members can be re-nominated with proper approval from the management and as per the guidelines laid by the act.

b. The ICC is responsible for:

- i Investigating every formal written complaint of sexual harassment.
- ii Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- iii Discouraging and preventing employment-related sexual harassment.
- iv Preparation of annual report and action taken report and submission of the same to the management and government bodies as per the provisions of law.

6. PROCEDURE FOR DEALING WITH COMPLAINTS

6.1. Filing a Complaint:

Any employee who feels and is being sexually harassed directly or indirectly preferably submit a complaint of the alleged incident to any member of the Committee in writing with her signature within 90 days of occurrence of incident. Or send an email to icc.committee@crystalcrop.com

The Committee members on receiving a complaint will initiate the process for investigation. The Committee will hold a meeting with the Complainant within 5 days of the receipt of the complaint, but no later than a week in any case.

At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative 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 event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an “Enquiry” shall be conducted and concluded.

Complaints must be brought within 3 months of the incident of Sexual Harassment.

In conducting the inquiry at least three members of the committee including the Chairperson or designated Presiding Officer shall be present.

As per section 7(6) of the Notified Rules (GSR 769 E), both the aggrieved and the respondent shall not be allowed to bring in any legal practitioner to represent their cases, till the matter is pending with the ICC.

Complaints brought after the designated time period shall be taken up based on the prerogative of the Internal Complaints Committee and the legal team of the Company.

The determination of whether the complaint was timely or whether extraordinary circumstances exist to extend the complaint period must be made in conjunction with the Legal Team. (according to the law the right to lodge a complaint cannot be restricted by the Company)

The complainant needs to provide the complaint in writing. The complaint shall include the circumstances giving rise to the complaint, the dates of the alleged occurrences, and names of the witnesses, if any. The complaint shall be signed by the Complainant.

The Internal Complaints Committee shall extend all necessary help and guidance to the complainant to file the complaint in writing. In cases where the complainant is unable to file a complaint due to any physical or mental condition or the complainant is deceased , then the same can be filed through the designated representative as per Section 6(i), 6(ii) of the Notified Rules (GSR 769 E),

In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the committee may determine to dismiss the complaint without further investigation after consultation with Legal Team.

In case the complaint is found to be false, the Complainant shall be liable for appropriate action in accordance with Section 14 of POSH Act as may be deemed fit by the Management.





6.2. Enquiry Process:

The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.

If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee, he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.

The Committee shall call upon all witnesses mentioned by both the parties.

The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

The Committee shall complete the “Enquiry” within reasonable period but not beyond 3 months and communicate its findings and its recommendations for action to the Chief Human Resource Officer (“CHRO”). The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

The CHRO will direct appropriate action in accordance with the recommendation proposed by the Committee.

The Committee shall be governed by such rules notified by the Government.

6.3. Decision and Action:

Once the investigation is completed, a decision will be made regarding the validity of the harassment allegations by the committee. If it is determined that harassment has occurred, prompt, remedial action will be taken by the committee. The investigation details and the findings will be shared with the CHRO and agree on the applicable disciplinary action. This may include some or all the following:





- i. Restore any lost terms, conditions or benefits of employment to the complainant. (this needs to be further defined and its advisable that remedial measures be clearly defined in consultation with management)
- ii. Discipline the accused. This discipline can include demotion, suspension and termination.

The disciplinary action will be carried out by the CHRO. Such disciplinary action may even include transfer, demotion or termination. All related documents will be maintained in the associate's folder, ensuring confidentiality.

This sexual harassment policy shall not, however, be used to raise malicious complaints. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action which may include demotion, suspension or termination will be taken against the person raising the complaint.

The Chairperson of the Committee will share the details of all complaints received and redressed with the Corporate Ombudsperson on a quarterly basis.

As per the "Provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, "the employer shall include in its report the number of cases filed, if any, and their disposal under this act in the Annual report of the Company.

6.4. Confidentiality

The contents of complaint(s), the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by Crystal shall not be published, communicated, or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner. For the purpose of completing the investigation, key witnesses or other stakeholders may be required to be taken into confidence at the strict discretion of the Internal Committee.

6.5. False and Malicious Complaints

What can be done if the employee has filed a false complaint of sexual harassment against a colleague, a senior or a junior employee? If the Internal Complaint Committee is of the view that a malicious or false complaint has been made, it may recommend that a penalty be levied on the complainant in accordance with applicable service rules. However, an inquiry must be made in order to establish malicious intent. Also, mere inability to substantiate a complaint will not attract action under this provision.





7. INTERIM RELIEF

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the Management of Crystal to: -

- Transfer the aggrieved individual or the respondent to any other workplace; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restraint the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief is implemented, CHRO shall inform the committee regarding the same.

8. DOCUMENTATION

The Committee shall keep complete and accurate documentation of the complaint, its investigation and the resolution thereof. The incident would be documented in both the complainant's and the accused's files with the full report of the Complaints Committee.

9. OUTSIDE COMPLAINTS MECHANISMS

A person who has been subject to sexual harassment can also make a complaint outside of the Company.

10. DISSEMINATION OF THE POLICY

A copy of this policy shall be circulated amongst all the employees of the Company and will be made available at each unit/premises of Crystal.

Further, a copy of the Policy would be uploaded on the website www.crystalcropprotection.com

11. REVIEW AND AMENDMENT

This Policy would be subject to revision/amendment in accordance with the guidelines as may be issued by the Government or such other regulatory authority as may be authorized, from time to time, on the subject matter.

The Policy may be reviewed by the Audit Committee in the event of any structural change in the organization, for instance merger, demerger, and capital infusion by a third party etc.

In case of any amendment(s), clarification(s), circular etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular etc.





12. FAQ's RELATED TO THE POLICY

1) What is sexual harassment?

Sexual harassment is defined as any unwanted physical, verbal or visual sexual advances, requests for sexual favours, and other sexually oriented conduct, which is offensive or objectionable to the recipient.

Examples of sexual harassment include, but are not limited to,

- staring or leering,
- unnecessary familiarity, such as deliberately brushing up against you or unwelcome touching,
- suggestive comments or jokes,
- insults or taunts of a sexual nature,
- intrusive questions or statements about your private life,
- displaying posters, magazines or screen savers of a sexual nature,
- sending sexually explicit emails or text messages,
- inappropriate advances on social networking sites,
- accessing sexually explicit internet sites,
- requests for sex or repeated unwanted requests to go out on dates,
- behaviour that may also be considered to be an offence under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communications,

2) Who is an Aggrieved Person?

“Aggrieved Person” means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

3) When is conduct unwelcome or harassing?

Unwelcome sexual advances (either verbal or physical), requests for favours and other verbal or physical conduct of a sexual nature constitute sexual harassment when: Submission to such conduct is either explicit or implicit act. The conduct having sexual overtones has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

4) What is not sexual harassment?

Sexual harassment does not refer to behaviour that is based on mutual attraction, friendship and respect is not sexual harassment.

5) Who is an 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 expressed or implied and includes a co- worker, a contract worker, probationer, trainee, apprentice or so called by any other such name.

6) What is an Internal Committee?

Internal Committee means a committee constituted by the Company as per this Policy.

7) Who is a Respondent?

“Respondent” means a person against whom the aggrieved person has made a complaint.

8) What is a workplace?

“Workplace” includes any department, organization, undertaking, establishment, enterprise institution, and office or branch unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

9) Can both men and women be victims of sexual harassment?

(Not as per the law)

10) What are the types of sexual harassment in the workplace?

Sexual harassment can take many forms, including but not limited to supervisor harassment, co-employee harassment, and even harassment by non-employees.

11) What should one do if harassed sexually?

If any employee feels that she/he has been the recipient of sexually harassing behavior directly or indirectly, report it immediately to any member of ICC in writing with his/her signature within 10 days of occurrence of incident. Or send an email to icc.committee@crystalcrop.com

12) What happens after a complaint is made?

The ICC will investigate the complaint. The committee will first speak to the person who has made the complaint and then will speak to the person named in the complaint. The anonymity of the involved parties will be maintained.

13) How bad must a hostile work environment get before I should complain?

An employee should notify an employer whenever they reasonably believe themselves to be the victim of harassment. If the conduct is severe, it may be enough that it occurred only once.





If the conduct is less severe, but occurred over an extended period of time, which too may be sufficient.

14) What if an employee witness inappropriate conduct, or someone tells him/her about it?

Anyone who witness inappropriate comments or conduct, even if it is directed at someone else, is encouraged to report it. Moreover, any employee who become aware of sexual harassment is required to report it to any of the committee members.

15) Will the complaint made be treated confidentially?

The Company shall make every reasonable effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties. Each situation is resolved as discreetly as possible, with information shared with those who need to know in order to investigate and resolve the matter. In certain circumstances, it may be possible to address the concerns without disclosure of the Identity of the parties, however this is not possible in every matter, as some situations require the disclosure of the complainant's identity in order to fully investigate the matter and/or to enable the accused harasser the ability to fully respond to the allegations against him or her.

16) Can the complainant or the respondent have a support person with her/him during the Investigation Process?

During the course of the investigation process, both the complainant and the respondent may have a friend or colleague present with them during the investigatory interview to support them during the process. The parties shall not however be allowed to bring any legal practitioner to represent them in their case in any stage of the proceedings.

17) What if the complainant is retaliated against for complaining about harassment or participating in an investigation?

The Company's Sexual Harassment Policy strictly forbids retaliation against anyone for making a good-faith harassment complaint.

Retaliation is a serious violation that can subject the offender to strict actions by the Company, independent of the merits of the sexual harassment allegation. Anyone experiencing any conduct that he or she believes to be retaliatory should immediately report it to one of the committee members.

Please Note: ICC will not entertain any anonymous complaints.





Annexure A

STATUS OF COMPLIANCE FOR CRYSTAL CROP PROTECTION LIMITED:

The Company has adopted Policy on Prevention of Sexual Harassment of women at workplace for Employees working at Crystal Crop Protection Limited, with the following persons:

A. Internal Complaint Committee (Core Committee Members) at Head Office

S. No.	Name	Designation
1.	Ms. Pooja Dawar	Presiding Officer
2.	Ms. Jyoti Sirohi	Member
3.	Mr. Devendra Joshi	Member
4.	Mr. Abhishek Khandelwal	Member
5.	Adv. Meena Balwal	External Member – NGO

B. ICC members at other offices of the Company:

Name	Designation
CCPL – Nathupur	Member - Mr. Janardhan Prasad Bhadula
	Member - Ms. Sanjay Mittal
CCPL – Dahej	Member - Ram Alakh Awadhbihari Tripathi
	Member - Ms. Sai Nandan Bohare
CCPL – Nagpur	Member - Ms. Hemant P. Suradkar
	Member - Mr. Tanneru Babu
CCPL – Jammu	Member - Mr. Pawan K Gupta
	Member - Mr. Sanjay Sharma
Modern Papers	Member - Mr. Jetinder Reshi
	Member - Mr. Chandershekhar
Nexus – Anand	Member - Ms. Abhishek Kaushik
	Member - Mr. Alpesh B Thaker

All the meetings of ICC at HO and other locations will be headed by the Presiding Officer and the external member will be invited to each meeting of ICC.





Annexure B

STATUS OF COMPLAINTS

No. of cases filed	No. disposals done	Remarks





Annexure C

COMPLAINT FORM

S. No.	Aggrieved Employee's details	What incident took place?	Where did it take place? (Location)	When did it take place?	Who committed the act?
	<ul style="list-style-type: none">• Name:• Employee Code• Department:• Location:• Reporting Manager:				





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