

ULTRAMARINE & PIGMENTS LTD

POLICY ON PROHIBITION OF SEXUAL HARASSMENT

(PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE)

I.COMMITMENT:

Ultramarine & Pigments Limited is committed to provide a work environment that ensures every employee is treated with dignity and respect

We promote a work environment that is conducive to the professional growth of our women employees and encourage equality of opportunity for all.

We adhere to Zero Tolerance towards any form of sexual harassment and ensures that all requisite measures are taken to address it.

II.SCOPE

This policy applies to all the categories of employees, including contractual irrespective of nature of work of the Company. It also applies to visitors to the company. The company will not tolerate sexual harassment, whether engaged in by employees, by clients or by suppliers or any other business associates.

No. 556, Vanagaram Road, Chennai-600 053, would be considered as a unified workplace.

The workplace means and includes:

1. All offices or other premises where the Company's business is conducted
2. All Company related activities performed at any other site away from the Company's premises.
3. Any transport provided by the company for any company related activities
4. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Harassment at the victim's place of residence by an employee or associate of the company will also be included under the purview of this policy.

III. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment includes:

1. Unwelcome sexual advances (Verbal, Written, Physical)
2. Demand or Request for sexual favors
3. Any other type of sexually oriented conduct
4. Verbal abuse or 'joking' that is sex oriented
5. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and submission to such conduct is either an explicit or implicit term or condition of employment and or submission or rejection of the conduct is used as a basis for making employment decisions.

IV. RESPONSIBILITIES OF THE EMPLOYEE

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from any form of sexual harassment.

Every employee or associate has the right to be protected against harassment, regardless of whether the accused considers his or her own behaviour to be normal or acceptable and of whether the harassed person has the opportunity to avoid the harassment.

V. COMPLAINT MECHANISM:

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 "Complaints Committee" has been constituted to redress and take appropriate steps.

The Complaints Committee will comprise of the following members:

S.no	Name	Contact details	Location
1.	Ms. Meena Prakash (Presiding officer)	9087033704	Chennai
2.	Ms. Subiksha Ilayaraja	8754624214	Ambattur
3.	Ms. A Sridevi	9585508749	Ambattur
4.	Mr. Vaithyalingam	8220013853	Ranipet
5.	Ms. Girija	9585593615	Ranipet
6.	Ms. Lakshmi Prasanna	8331034830	Naidupet
7.	Mr. Pavan Kumar	9281406899	Naidupet
8.	Ms. Vijaya	7675879540	Naidupet
9.	Ms. Yasodhai Damodaran (External member)	8754493216	

Role of Committee:

The Prevention of Sexual Harassment Act, 2013 grants the Committee the powers enjoyed by a Civil court under the Code of Civil Procedure, 1908.

1. Investigating every formal written complaint of sexual harassment.
2. Taking appropriate remedial measures to respond to any substantiated allegation of sexual harassment.
3. Discouraging and preventing employment related sexual harassment.

VI. PROCEDURES FOR RESOLUTION , SETTLEMENT, OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to provide a supportive environment in which to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

1. When an incident of sexual harassment occurs, the victim of such conduct can communicate her disapproval and objections immediately to the harasser and request / advise the harasser to cease their harassment.
2. If victim is not comfortable with addressing the harasser directly, or if the harassment does not stop, she can bring her concern to the attention of the Complaints Committee for redressal. The

Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. Any employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the Committee. The complaint shall be in writing. The period of filing the complaint is 3 months from the date of last incident which can be extended to another 3 months as per the discretion of the committee. Alternatively the employee can send complaint through an email to complaints@ultramarinepigments.net, which will be accessed only by the Committee Chairperson. The employee is required to disclose her name, department, and location she is working in, to enable the Chairperson to contact her and take the matter forward. The complainant should take efforts to include all instances of harassment in the written complaint, with as much detail on dates, venues and witnesses if any. **All efforts will be taken to ensure that the complaint remains confidential, and that the complainant's privacy is not invaded.**

2. Upon receipt of a complaint, the alleged harasser will be informed that a complaint has been made, and will be advised that any retaliatory moves or threats will not be tolerated.

3. The Chairperson of the Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment preferably within **7 days** from the receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, the Chairperson will record this finding with reasons and communicate the same to the complainant.

4. If the Chairperson of the Committee determines that the allegations constitute an act of sexual harassment, he/she will proceed to investigate the allegation with the assistance of the Complaints Committee.

5. Where such conduct on the part of the accused amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

6. The Committee shall conduct such investigations **in a timely and confidential manner** with a total of 90 days from the date of receipt of complaint. The Committee shall furnish the inquiry report within 10 days from the end of inquiry to the employer.

Corrective action may include any of the following individually, or in any combination:

- a. Formal apology
- b. Counseling
- c. Written warning to the perpetrator and a copy of it maintained in personnel file
- d. Change of work assignment / transfer for the perpetrator
- e. Suspension or termination of services of the perpetrator

7. In case the complaint is found to be false or malicious, the Complainant shall be liable for appropriate disciplinary action by the Management.

VII. 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.

To protect the interest of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigation process to the extent practicable and appropriate under the given circumstances.

VIII. ACCESS TO THE REPORTS AND DOCUMENTS:

All records of Complainants, including contents of meeting, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under any statute.

IX. PROTECTION TO COMPLAINANT /VICTIM:

The company is committed to ensure that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to immediate disciplinary action. The Company will ensure that victim or witness are not victimized or discriminated against while dealing with complaints of sexual harassment. Any ostracism of the victim by colleagues will be discouraged, and will result in counseling and disciplinary action.

X. CONCLUSION:

In conclusion, the company reiterates its commitment to providing its women employees, a workplace free from harassment/discrimination and where every employee is treated with dignity and respect.

For ULTRAMARINE & PIGMENTS LIMITED

Sd/-

**TARA PARTHASARATHY
MANAGING DIRECTOR**