

ADVANCED ENZYME TECHNOLOGIES LIMITED

(“ADVANCED ENZYME” / “COMPANY”)

POLICY FOR PREVENTION OF SEXUAL HARASSMENT DATED APRIL 2018

(IN SUPERSESSION OF THE EXISTING POLICY FOR PREVENTION OF SEXUAL HARASSMENT)

Introduction:

Advanced Enzyme's quest for competitive excellence consists of our commitment to lawful and ethical conduct and adhering to our company's values. Integrity, honesty and respect for people remain some of our values.

The Company is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

Advanced Enzyme's Policy for Prevention of Sexual Harassment is formed & adopted (in supersession of the existing policy for prevention of sexual harassment) to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment, pursuant to the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 and rules framed thereunder (as amended) (“Act”).

Applicability:

This Policy applies to all the employees and trainees (whether in the office premises or outside while on duty) of all the units of Advanced Enzyme Technologies Limited in India, where sexual harassment occurs to an employee as a result of an act by a third party or outsider while on official duty, Advanced Enzymes will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

What is Sexual Harassment?

Sexual Harassment includes such unwelcome sexually determined behavior or acts, as physical contacts and advances, sexually colored remarks, showing pornography and sexual demands whether by words, gestures or actions. Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that any objection would disadvantage the complainant in connection with employment, including recruiting, promotion, salary, job and/or when it creates a hostile working environment.

Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as:

- (a) Physical contact and advances;
- (b) A demand or request for sexual favors;
- (c) Sexually colored remarks;
- (d) Showing pornography;
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories - quid pro quo and creation of a hostile working environment.

(a) Under the quid pro quo (meaning this for that) form of Sexual harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or keeping a job benefit / promotion and/or threatens to fire the employee if the conditions are not met.

(b) A hostile work environment arises when a co-worker or supervisor creates a work environment through unwelcome sexually determined behavior (whether directly or by implication, verbal or physical conduct) that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on personal dignity. For example, an employee tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers.

The following circumstances, among other circumstances, if it occurs or is present in relation to any act or behavior of Sexual Harassment may amount to Sexual Harassment:

- Implied or explicit promise of preferential treatment in employment;
- Implied or explicit threat of detrimental treatment in employment;
- Implied or explicit threat about the present or future employment status

Interference with her work or creating an intimidating or offensive or hostile work environment for her;

Humiliating treatment likely to affect her health or safety

However, an employee who is sexually harassed can complain about the same even if there is no adverse job consequence.

Responsibilities regarding Sexual Harassment:

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 Sexual Harassment.

Complaint Mechanism:

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 victim under this policy.

Internal Complaints Committee:

The "Internal Complaints Committee" shall consist of a Chairperson / Presiding Officer, Secretary and minimum 3 other members. Out of these Committee members, at least half of the total members shall be women. The Chairperson / Presiding Officer shall be a woman employed at a senior level at workplace from among employees. One of the Committee members shall be a woman from a reputed NGO/ legal body / any other social work body familiar with the issues of sexual harassment. The tenure of the committee members & its Presiding Officer shall be 2 years from the date of their nomination & names of the committee members shall be announced by the Human Resources Manager. At each location to which the provisions of the Act is applicable, there will be a women representative. The Internal Complaints Committee shall be the authority for disciplinary actions on issues relating to sexual harassment at the workplace, subject to the provisions of the Act. The Internal Complaints Committee shall have such powers & role as are prescribed under the Act, from time to time.

Dealing with the Complaint:

Given that this policy highlights a preventive focus, there is a need to distinguish between an informal and formal process.

PROCEDURE FOR INFORMAL GRIEVANCE REDRESSAL:

Informal processes normally involve an intermediary means for resolving a problem. In the case of Sexual Harassment, at first instance, the person (i.e. HOD/ HR / Woman representative of the location) may be the point of first contact for anyone seeking informal support/intervention to stop unwelcome behavior.

A sense of restraint and responsibility on the part of all concerned is critical for the effective functioning of these guidelines. The preventive / informal process that can be adopted is as follows:

1. Convey to the person who is the cause of distress, about what that person's actions, words, behavior is doing and convey in no uncertain terms that such behavior is not appreciated. What is important is the "Way" a particular behavior, action or word is perceived; "Intent" is of no consequence.
2. The second step would be to approach someone within the company – preferably your Superior or HR Representative. The Superior or HR Representative would then try and counsel / talk it over with a view towards closing the matter amicably.
3. In any case all such incidents along with the resolution agreed to amicably, needs to be reported in writing to the Head of HR who will then provide a short written report to the Internal Complaints Committee and the matter will be closed.
4. However, in the event of it not being resolved, then it would need to be escalated to the Internal Complaints Committee.

PROCEDURE FOR FORMAL GRIEVANCE REDRESSAL:

In the event of the complaint not being resolved through informal mechanism, then it would need to be escalated to the Internal Complaint Committee for redressal.

1. It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co-worker may also inform the Complaints Committee of any instance or behavior of sexual harassment by a co-worker towards another employee.
2. The concerned employee shall give the complaint in writing to any of the committee member giving details of the incident within a period of three months of its occurrence and in case of series of incident within three months from the date of last incident.
Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing. If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent. - Legal heir, relative or friend - Co-worker - Any person having the knowledge of the incident If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.
3. Once the complaint is received, it will be kept strictly confidential.
4. Upon receipt of the complaint, the Complaints Committee shall send a copy of the complaint to the respondent within 7 working days
5. Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint
6. No legal practitioner can represent any party at any stage of the said inquiry.
7. The Complaints Committee shall conduct an inquiry into the complaint in accordance with the principles of natural justice. At the Committee meeting, a minimum of three committee members including the Presiding Officer shall be present.
8. The Committee shall ensure that a fair and just investigation is undertaken immediately.
The Committee may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without reason. 15-day written notice to be given to the party, before termination or ex-parte order.
9. Both the complainant and the alleged accused / respondent initially will be questioned separately with a view to ascertain the veracity of their contentions. If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily and shall provide the written statement, if required by the Committee.
10. The Chairperson / Presiding Officer after studying the report & discussion with the Committee members shall submit its recommendation to the Management within 10 days of completing the inquiry. a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee The complainant and the accused shall be informed of the outcome of the investigation.
11. The investigation shall be completed within 3 months of the receipt of the complaint. If the investigation reveals that the complainant has been Sexually harassed as claimed, the accused will be subject to the disciplinary action accordingly. The implementation of the recommendation of Internal Complaint Committee by Management should be done within 30 days of receipt of such recommendation.

Disciplinary Action:

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused.

Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

Confidentiality:

Individuals involved in the complaints process / system must refrain from divulging the details of the complaint, any information gathered in the course of the inquiry and the identities of the person involved. Specifically, the contents of the complaint, the identity and addresses of the Aggrieved Person, Respondent, and witness, any information relating to conciliation and inquiry proceedings recommendations of committee, action taken by All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

Protection to Complainant / Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

False or Motivated Complaints:

In case the ICC 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 has produced any forged or misleading documents, it may recommend to the organization to take suitable action against the complainant who has made the complaint or provide adequate proof need not attract action against the complainant. Further, the malicious intent on part of complainant needs to be established through the inquiry process before any action against such complainant is recommended by the ICC to the organization.

Appeal:

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act and rules, within 90 days of the recommendations being communicated

Conclusion:

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

Please Note: The ICC will not entertain any anonymous complaints.

REVIEW OF THE POLICY

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

In case of any conflict between the terms of the Policy and the provisions of the Act, the provisions of the Act shall prevail.