

MAWANA FOODS PRIVATE LIMITED

SEXUAL HARASSMENT PROHIBITION POLICY

Introduction:

Mawana Foods Private Limited (Company) (formerly known as Mawana Foods Limited and Siel Edible Oils Limited), having its registered office at New Delhi and Corporate Office in Gurgaon, Haryana and has a nationwide presence.

The Company provides equal opportunities to all its employees without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, nationality and disability. The Company upholds the dignity of all its employees and fosters growth through creating a positive and congenial work environment. The Company considers sexual harassment in any form as a serious workplace issue and shall stringent action against the offenders as per The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (Act).

Scope of the Policy

The policy is applicable to all people employed with the Company in any of its offices, warehouses or any other establishment of the Company in India, whether such people are/ employed directly or through an agent including contractors and are working on temporary, ad hoc or on a voluntary basis.

This policy covers all allegations of sexual harassment irrespective of whether such act is alleged to have taken place within or outside the Company premises arising out of or during the course of employment, including official trips, conferences and training programs, work assignments outside the office premises, transportation provided by the Company or in any form of communication, whether verbal or written.

Objective:

The objective of this policy is:

- i) To provide guidelines for preventing inappropriate workplace behavior of sexual harassment.
- ii) To provide information to all employees about their responsibilities to prevent and address such inappropriate workplace conduct.
- iii) To provide a timely and fair complaint handling process to resolve such complaints.
- iv) Ensure that the Company employees are trained to perform their roles in relation to this policy.



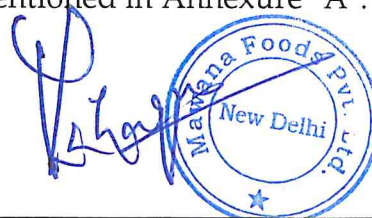

Sexual Harassment

- a. Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
- Physical contact or advances; or
 - A demand or request for sexual favors; or
 - Making sexually colored remarks; or
 - Showing pornography; or
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- b. Following circumstances, among other circumstances, if it occurs or is present in relation to or is connected with any act or behavior of sexual harassment may amount to sexual harassment:
- Implied or explicit promise of preferential treatment in the employment; or
 - Implied or explicit threat of detrimental treatment in the employment; or
 - Implied or explicit threat about present or future employment status; or
 - Interferes with work or creating or intimidating or offensive or hostile work environment; or
 - Humiliating treatment likely to affect health or safety of the employee.
- c. Sexually harassing or offensive conduct in the workplace, by or against the employees, whether committed by supervisors, managers, non-supervisory employees or third parties is strictly prohibited.

Sexual Harassment Prohibition Committee (Committee)

The Company has constituted a committee known as Sexual Harassment Prohibition Committee (Committee). The Committee has been formed to consider and redress complaints of sexual harassment. The Committee shall consist of atleast 4 members to be nominated by the Company comprising of a Presiding Officer who shall be a woman employed at a senior level, 2 or more employees who have had experience in social work or have legal knowledge and one member from amongst non-governmental organizations or associations committed to the cause of women or a social worker with atleast 5 years of experience in the field of social work and having expertise on issues relating to sexual harassment or a person familiar with labour, service, civil or criminal law and having expertise on issues relating to sexual harassment. Atleast one half of the total members so nominated shall be women.

Details of current members of the Committee are mentioned in Annexure "A".





Grievance Redressal Process

- i) An aggrieved employee shall make a written complaint in relation to sexual harassment at the workplace to the Committee within three months from the date of incident. The complainant has to submit 6 copies of the complaint along with supporting documents and names and addresses of the witnesses. In case the employee is not able to make complaint in writing, the Committee shall provide necessary assistance to the employee so that the complaint can be made in writing.

The Committee can extend the time limit for filing the complaint by a maximum period of three months in case it is satisfied that the circumstances existed which prevented the employee from filing the complaint within the initial period of 3 months. The reasons for extending this time limit have to be recorded in writing by the Committee.

- ii) The Committee may, at the request of the complainant, before initiating enquiry, takes steps to settle the matter between the complainant and the respondent through conciliation. In such a case, no monetary settlement can be the basis of conciliation. If a settlement is reached, the Committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation. The Committee shall provide the copy of the settlement to both the complainant and the respondent. The Committee shall not make any further enquiry in such a case.
- iii) Subject to clause ii above, the Committee shall conduct an enquiry into the complaint made by the aggrieved woman. The Committee shall also make an enquiry in case the complainant informs the Committee that the settlement arrived at in point number (ii) above has not been complied with by the respondent.

The Committee shall conduct the enquiry on the basis of principles of natural justice. For conducting the enquiry, the Committee shall send one copy of the complaint to the respondent within 7 working days of receipt of the complaint. The respondent shall file the reply along with the list of documents and names and addresses of the witnesses within a period of 10 working days of receipt of the copy of the complaint. The complainant and the respondent have to present their case themselves before the Committee and cannot be represented by others, whether legal practitioner or otherwise. During the course of enquiry, if both the parties are employees of the Company, the Committee shall give an opportunity of being heard and provide the copy of findings of the Committee to both the parties so that they can make their representation to the Committee. For the purpose of making an enquiry, the Committee shall have the power to:

- a) Summon and enforce the attendance of any person and examine such person on oath;
- b) Require the discovery and production of documents; and
- c) Any other matter which may be prescribed.

The Committee shall have the right to terminate the enquiry proceedings or to give an ex-parte order if the complainant or the respondent fails, without sufficient cause, to be present for three consecutive hearings convened by the Committee. The Committee has to give an advance written notice of 15 days to the concerned party before passing such termination or ex-parte order. The Committee shall complete the enquiry within the period of ninety days from the date of receipt of complaint. During the pendency of the enquiry, on a written request by the complainant, the Committee may recommend to the Company to:

- a) transfer the complainant or the respondent to any other location, or
- b) grant leave to the complainant upto a maximum period of three months, or
- c) restrain the respondent from doing the performance appraisal of the complainant and assign the same to another supervisor.

On such recommendations, the Company shall implement the recommendations and confirm to the Committee.

After completion of the enquiry, the Committee shall provide a report of its findings to the Company within a period of ten days from the completion of enquiry. If the Committee arrives at the conclusion that allegations have not been proved, it shall recommend to the Company that no action is required to be taken. However, if the Committee arrives at the conclusion that the allegations against the respondent have been proved, it shall recommend to the Company to take disciplinary action against such respondent which may include written apology, warning, reprimand or censure, withholding of promotion or increment, undergoing counseling session, carrying out community service or termination of the employment and deduct appropriate damages from the salary of the respondent to be paid to the complainant.

The Company shall implement the recommendations of the Committee within a period of sixty days of receiving such recommendations.

- iv) The Company including the Committee shall always keep confidential all the proceedings under this policy including the content of the complaint, identity, address of the complainant, respondent and witnesses, recommendations of the Committee and the action taken by the Company.



False or malicious complaint or false evidence

If the Committee arrives at the conclusion that the:

- a. complainant has made the complaint against the respondent, knowing it to be false, or
- b. if the complainant or any other witnesses has provided any false or misleading document,

the Committee shall recommend to the Company to take disciplinary action against such complainant or witnesses which may include written apology, warning, reprimand or censure, withholding of promotion or increment, undergoing counseling session, carrying out community service or termination of employment.

Appeal

Any person aggrieved by the recommendations of the Committee may prefer an appeal in Courts or as prescribed in the Act. Such appeal has to be filed within ninety days of the recommendations of the Committee.

For and on behalf of the Board of Directors
Mawana Foods Private Limited


(Rakesh Kumar Gangwar)
Managing Director
DIN:09485856



Annexure-A**Members of the Committee:**

(This Committee was re-constituted by the Board in its meeting held on 31st December 2024):

1. Ms. Neha Pandhi, Dy. General Manager
(who shall act as Presiding Officer)
Mobile: +91 9811475742, Email Id: nehapandhi@mawanafoods.com
2. Mr. Rakesh Kumar Gangwar, Managing Director
Mobile: +91 9910443957, Email: Id: rkgangwar@mawanasugars.com
3. Mr. Narender Jain, Chief Financial Officer
Mobile: +91 9718301768, Email Id: narenderjain@mawanafoods.com
4. Dr. Jyotsna Chatterji (Independent Representative)
Mobile: +91 9810017523, Email Id: jwpindia@gmail.com