

DAL/HR/25-26/Nov/01

DHANUKA AGRITECH LIMITED
w.e.f from 1st November, 2025

POLICY AGAINST SEXUAL HARASSMENT OF WOMAN AT THE WORKPLACE

OBJECTIVE:

Dhanuka aims to promote a healthy and congenial working environment irrespective of gender, caste, creed or social class of the employees. We value every individual and are committed to protecting the dignity and respect of every individual. Integrity, honesty, transparency and respect for people remain some of our core values. Hence, we have zero-tolerance towards sexual harassment offences and any act of sexual harassment shall result in serious disciplinary action.

This policy has been formulated keeping in view the provisions under "The Sexual Harassment of Woman at Workplace (Prevention, Prohibition & Redressal) Act, 2013" (hereinafter referred to as SHWW Act) and its Rules. The said policy is to define the guidelines and the process to be followed in order to provide protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto.

For any doubt or further clarification, reference be made to the SHWW Act and Rules.

APPLICABILITY:

This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees of the Company in India. This policy also extends to any person visiting the organization which includes permanent, temporaries, trainees and employees on contract at its workplace or at client's sites. This policy shall also extend to any applicants, candidates, customers, contractors, suppliers, clients, visitors, expats etc. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates. Local laws of the country depending upon employee's nature of job shall take precedence over this policy, in other geographies, if applicable.

Applicable to:

- All the employees and consultants (including Interns/ Apprentice/ Management Trainees) at Dhanuka Agritech Ltd.
- All office premises and areas which can be termed as notional extension of employer's premises.
- The extended "Workplace" - Any place visited by the employee arising out of, or during course of employment, including transportation provided by employer.
- Interactions arising as a result of employment within the company.

All the visitors & vendors associated with us & visiting any premises of the company or whose premises our employees visit during the course of business.




Registered & Corporate Office: Global Gateway Towers, Near Guru Dronacharya Metro Station,
MG Road, Gurugram-122002, Haryana

Tel: +91-124-434-5000, Email: headoffice@dhanuka.com, Website: www.dhanuka.com

CIN: L24219HR1985PLC122802

This policy will extend to all employees of the Company including those employed on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, customers, visitors, vendors, suppliers, contractor or contract worker, probationer, trainee, apprentice or called by any other such name, whether for the remuneration or not, or working on a voluntary basis or otherwise as per the terms of employment as are express or implied but are subjected to sexual harassment at the Premises (defined hereinafter) of the Company.

DEFINITIONS:

In this Policy document, unless there is anything repugnant to the subject or context thereof, the words and expressions as stated below shall have the following meanings: -

- (i) **Complainant:**
Complainant means any Female [as per Section 2(a) of SHWW Act] who has lodged a complaint of sexual harassment at workplace and has been subjected to any act of sexual harassment by the perpetrator (herein after referred to as 'Respondent').
- (ii) **IC:**
Internal Committee.
- (iii) **Respondent:**
Respondent means any individual against whom the complaint for sexual harassment has been lodged.
- (iv) **Workplace:**
Workplace means the places referred in clause 2(o) of the SHWW Act and inter-alia includes every and all offices, branches and Depots located anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking such journey.
- (v) **Employee**
An Employee means a person employed with the Company for any work on permanent, deputation, temporary, consultants, part time, 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.
- (vi) **Sexual Harassment:** Sexual Harassment is any unwelcome sexually determined behavior, such as:
 - a. physical contact and advances;
 - b. a demand or request for sexual favors; whether verbal, textual, graphic, and electronic or by any other action;
 - c. sexually colored remarks;
 - d. showing pornography; and
 - e. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

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The following circumstances if it occurs or is present in relation to any sexually determined act or behavior 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 the person's work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect her health or safety.

INTERNAL COMMITTEE (IC)*:

A Committee being constituted as per Section 4 of the SHWW Act read with its Rules. The IC will Comprise of the following:

Presiding Officer - The presiding Officer shall be a woman having appropriate experience and authority to handle sensitive issues with respect and fairness at workplace from amongst employees.

Two Members - The member would be from amongst employees preferably committed to the cause of woman or who have had experience in social work or have legal knowledge.

External Member - The external member would be from amongst non-governmental organizations or associations committed to the cause of woman or a person familiar with the issues related to sexual harassment.

Provided that at least half of the total members so nominated shall be woman.

Every Member of the IC shall hold office for a period not exceeding three years, from the date of their nomination as may be specified by the Management.

Names of the members of the Internal Committee along with their contact details are provided in Annexure A.

Functions and Powers of the Internal Committee:

- The IC hold the power of Inquiring Authority, as appointed by the Management.
- The Committee shall have power and jurisdiction for conducting an inquiry into complaints of sexual harassment and also have the following powers as per the statute –
 - To process individual grievances concerning sexual harassment in the workplace.
 - Summon and enforce the attendance of any person and examine her/him on oath.
 - Requiring the discovery and production of documents.
 - Other matters, as prescribed.
- If the Aggrieved woman claims to have hostility in the organization, the IC may recommend to employer to:
 - Transfer the Aggrieved woman or the Respondent to any other workplace.
 - Grant leave to the Aggrieved woman up to a period 3 months.
 - Any other relief.




PROCEDURE FOR FILING A COMPLAINT:

- (a) The complaint should be made by an aggrieved woman within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of last incident. The complaint by an aggrieved woman employee shall be made to IC in writing and be sent either by post or given in person to the IC of the establishment.
- (b) The IC may, for the reasons to be recorded in writing, extend the time-limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period. Where the woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may make a complaint under this section.

Where the aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by: -

1. her relative or friend; or
2. her co-worker; or
3. an officer or the National Commission for Woman or State Woman's Commission; or
4. any person who has knowledge of the incident, with the written consent of the aggrieved woman.

Where the aggrieved woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by: -

- (i) her relative or friend; or
- (ii) a special educator; or
- (iii) a qualified psychiatrist or psychologist; or
- (iv) the guardian or authority under whose care she is receiving treatment or care; or
- (v) any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.

Notes:

- (i) Where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
- (ii) Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

PROCEDURE TO BE FOLLOWED BY IC ON RECEIPT OF COMPLAINT:

- (a) The IC would go through the details of the complaint and evaluate if there is a prima facie case or not.
- (b) The IC will initiate a detailed inquiry as deemed fit and also in line with the powers vested in a Civil Court the Code of Civil Procedure 1908.
 - a. The IC may proceed to make an inquiry/conciliation into the complaint of its receipt of the original complaint/closure or failure of conciliation/repeat complaint after thorough examination and proper recording of the proceedings.



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- b. Complainant should submit the complaint along with supporting documents and the names of the witnesses. The Committee will hold a meeting with the Complainant within five days of receipt of the complaint, but no later than a week in any case;
- c. 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;
- d. Upon meeting with the complainant, the IC sends 1 copy of the complaint to Respondent within 7 working days.
- e. Respondent replies with all supporting documents within 10 working days of receiving the copy of the complaint. The reply is submitted to the Complainant for their consideration.
- f. Whereafter, the process of conciliation is initiated & concluded. If conciliation fails, the inquiry shall be taken forward. It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the Respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.
- g. In either case, Committee shall provide a fair opportunity to the Complainant as well as the Respondent to represent their position and provide their explanations.
- h. Where a settlement has been arrived at in the conciliation process, the same shall be recorded and has to be forwarded to the employer.
- i. The internal committee will provide the copies of the settlement arrived at after the conciliation process to the Complainant as well as the Respondent.
- j. If the conciliation fails, hereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, whereafter, an investigation/inquiry shall be conducted and concluded.
- k. The IC initiates inquiry in the following cases:
 - No conciliation is requested by aggrieved woman.
 - Conciliation has not resulted in any settlement.
 - Complainant informs the IC that any term or condition of the settlement arrived through conciliation, has not been complied with by Respondent.
- l. No legal practitioner can represent any party at any stage of the inquiry procedure.
- m. The Committee will maintain a record of the complaints received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- n. The Committee makes inquiry into the complaint in accordance with the principles of natural justice and the Committee shall provide every reasonable opportunity to the Complainant and to the Respondent, for putting forward and defending their respective case.
- o. Written records of all discussions are to be maintained by the committee.
- p. The inquiry shall be completed within a maximum period of 90 working days (3 months). As per the Act, the period of enquiry may be extended to 9 months for reasons recorded by IC for such extension or delay caused.
- q. Within 10 days of completion of an inquiry under this Act, the Internal Committee shall provide a report of its findings with its recommendations to the Employer.
- r. The management will direct appropriate action within 60 days of receiving the inquiry report, in accordance with the recommendation proposed by the Committee or as they deem fit as per the code of conduct or terms of appointment letter of the guilty and the quantum of offence.

TERMINATION OF INQUIRY

- a. IC may terminate the inquiry or give ex-parte decision, if the 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.





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ACTION TO BE TAKEN AFTER INQUIRY

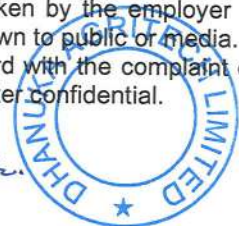
- a. Post the inquiry the IC submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.
- b. The findings and recommendations are reached from the facts established and is recorded accurately.
- c. **If the complaint is unsubstantiated:**
 - i. Where the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter.
 - ii. Further, the IC ensures that both parties understand that the matter has been fully investigated and concluded.
- d. **If the complaint is substantiated:**

Where the IC arrives at the conclusion that the allegation against the Respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

 - i. Counseling;
 - ii. Censure or reprimand;
 - iii. Apology to be tendered by Respondent;
 - iv. Written warning;
 - v. Withholding promotion and/or increments;
 - vi. Suspension;
 - vii. Termination;
 - viii. Or any other action that the Management may deem fit.
 - ix. The employer acts upon the recommendations within 60 days and confirm to the IC.
- e. **If the complaint is proved to be malicious:**
 - i. Where the IC arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the Aggrieved woman or the person making the complaint.
 - a. Where the IC arrives at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading document, it may recommend the Management to take appropriate action against such witness(s).
 - ii. The actions recommended should be similar to the ones proposed for the Respondent in case of substantiated complaints.
 - iii. While deciding malicious intent, the IC should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

CONFIDENTIALITY

- a. The identity of the Complainant, Respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the ICs, action taken by the employer is considered as confidential materials, and not to be published or made known to public or media.
- b. The Company understands that it is difficult for the victim to come forward with the complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

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- c. To protect the interests of the victim, the Respondent person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.
- d. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

PROTECTION TO COMPLAINANT /VICTIM:

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

OTHER POINTS TO BE CONSIDERED

- a. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, M/s. Dhanuka Agritech Ltd shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- b. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

GUIDELINES TO BE KEPT IN MIND BY IC WHILE RECOMMENDING ACTION:

- (a) To conduct the enquiry as per the principles of natural justice and in a strictly confidential manner.

APPEAL BY THE AGGRIEVED WOMAN PERSON:

- a. Any party not satisfied or further aggrieved woman 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.

INTERPRETATIONS:

- a. On any occasion or any doubt, differences or dispute in respect of proper interpretation of any terms, condition or clause hereof, the resolution of dispute or the interpretation of such clause given by the Management shall always be final and binding between the parties. This policy shall supersede any other previous policies/communications on the subject.

Amendments in the policy

- a. Any amendments to this policy including the reconstitution of the ICC Committee requires prior approval from the Managing Director / Chairman of M/s. Dhanuka Agritech Limited.

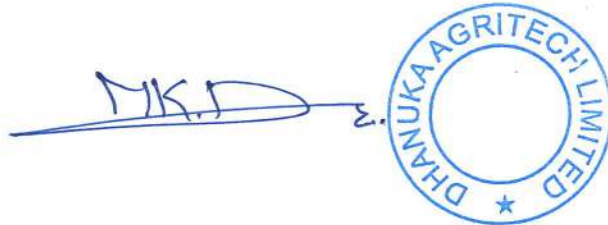


CONTACT FOR MAKING COMPLAINT:

Write an email to- ic@dhanuka.com or write

To
Presiding Officer
Internal Complaint Committee
Dhanuka Agritech Limited
Global Gateway Tower,
Near Guru Dronacharya
Metro Station, MG Road
Gurugram-122002

Please write **Complaint under POSH** as subject.

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Annexure A

Designation	Name	Contact Number	Email ID
Presiding Officer	Aastha Talwar	8527054755	aasthatalwar@dhanuka.com
Member	Swati Chaudhary	8750466317	swatichaudhary@dhanuka.com
Member	Ramya Shivam Goel	9818761209	ramyagoel@dhanuka.com
External Member	Dr. Aditi Kaushal	9891474370	aditikaushal@klafoundation.in



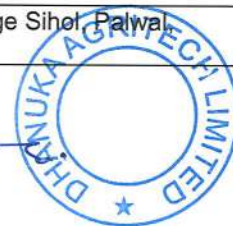

List of Offices

Registered & Corporate Office Gurugram	Global Gateway Towers, Near Guru Dronacharya Metro Station, MG Road, Gurugram, Haryana
Ahmedabad	1003-1006, 10th Floor, Signature-1, Near Divya Bhaskar, Near Jaguar Showroom, Makarba, S. G. Highway, Ahmedabad – 380051 (Gujarat), Phone: 079-66172605, 66172606
Regional Office – Gurugram	409, 4 th Floor, DLF City Court, Sikanderpur, Gurugram -122004, Haryana.
Hyderabad	4th Floor, Dev Dhanuka Prestige, Near Khaman Road - 12, Banjara Hills, Hyderabad – 5600034
Bengaluru	No. 14, 2 nd Cross, Ranganath Layout, Main Road, Flower Garden, Mysore Road, Opp – B.H.E.L Factory, Bengaluru, Karnataka – 560026
Salem	No, 8/34-F, 18/35-B, Sivamani Mill Compound, Meyyanpur, Main Road, Salem, Tamil Nadu - 636004
Indore	202, Vikram Urbane, Near Girdhar Mahal, Behind Sayaji Hotel, Vijay Nagar, Indore-452010 M.P
Raipur	Tendua Road, Yaduvansh Chowk, Near Amol Hardware, Hirapur, Raipur, Chhattisgarh – 492099
Kolkata	"Haute Street", 10th Floor, Suite No: 1001, 86A, Topsia Road (South), Kolkata – 700 046, Mob : 9830022380
Patna	Jakariyapur Bypass, Plot No. 475, Opp – Transport Nagar, Near Krishna Niketan Girls School, Patna, Bihar - 800007
Cuttack	IDCO, Plot No. 47, Phase 1, New Industrial Estate, Jagatpur, P.O – Jagatpur, Distt – Cuttack, Orissa -754021
Guwahati	241 / 242, 2 nd Floor, House of Biplab Dey, Opposite Dhirenpara Hospital, Guwahati, Assam - 781025
Ranchi	First Floor, Opp – Sita Guest House, Radha Marg, Lake Road (West), Ranchi, Jharkhand – 834001
Siliguri	East Chayanpara, Near Aashigarh More, Eastern Bypass, P.O – Ghoogomali, Siliguri, Distt – Darjeeling, West Bengal - 734006
Pune	602-603, 6th Floor, "Pride Icon", Near H.P. Petrol Pump, Kharadi, Pune-411014 (Maharashtra), Phone No.: (020) 66850500 & 501
DART – Palwal	Dhanuka Agriculture Research Station, Village Sihol, Palwal, Haryana 121102

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List of Manufacturing Units

Udhampur	Plot No. 1, I.I.D centre, SICOP Industrial Estate, Battal – Ballian, Udhampur 182101 (J&K)
Sanand	D-1/A-B, Ajanta Industrial Estate, Near Sarika Paints Sanand – Viramgam Road, At – Vasna Lyava Village, Tal – Sanand, Distt – Ahmedabad, Gujarat – 382170
Keshwana	Plot No. SP 4-8, RIICO Industrial Area, Keshwana, Tehsil, Kotputli, Distt – Jaipur, Rajasthan – 303108
Dahej	D-3/1/A, Phase -3, Amod Road, Dahej Industrial Estate, Taluka-Vagra, Bharuch Gujarat. -392130

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