SHREE KRISHNA PAPER MILLS & INDUSTRIES LTD.

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POLICY FOR PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARRASSMENT (POSH) AT WORK PLACE

Pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015}

PREVENTION OF SEXUAL HARASSMENT POLICY

Background:-

At Shree Krishna Paper, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to

- Treat each other with dignity and respect
- Follow the letter and spirit of law
- Refrain from any unwelcome behavior that has sexual connotation (of sexual nature)
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.

This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter"the Act"). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and the law, the law will prevail. This policy provides protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

Purpose & Scope:-

Purpose of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

This policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours

Anyone can be a victim of Sexual Harassment, regardless of their sex and the sex of the harasser. Shree Krishna Paper Mills and Industries Ltd. recognizes that sexual

harassment may occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Definitions:-

"Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: –
(a) physical contact and advances;
(b) a demand or request for sexual favours;
(c) making sexually coloured remarks;
(d) showing pornography;
(e) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
(f) 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 employment;
(ii) implied or explicit threat of detrimental treatment in employment;
(iii) implied or explicit threat about present or future employment status;
(iv)interference with work or creating an intimidating or offensive or hostile work environment;
(v) humiliating treatment likely to affect health or safety;
(vi)threat, intimidation, or retaliation against an Employee who speaks about unwelcome behavior with sexual overtones/ connotations.

"Internal Committee" means the committee constituted by the Employer to address any issue relating to the prevention, prohibition and redressal of Sexual Harassment at the Workplace irrespective of gender (hereinafter referred to as the "IC").

"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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

"Aggrieved Woman" means –
(i) in relation to a Workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent;
(ii) in relation to a dwelling place or house, a woman of any age who is employed in such a dwelling place or house.

“Aggrieved Person” means an individual of any age, caste, gender, or religion, whether employed or not and includes an Aggrieved Woman, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.

“Complainant” is either the Aggrieved Person or a person authorized by the Aggrieved Person who is raising the complaint.

“Respondent” means a person against whom the Aggrieved Person has made a complaint of Sexual Harassment.

Responsibility:-

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.

Prevention Action:-

The Company will take reasonable step to ensure prevention of sexual harassment at work place which may include circulating applicable policies and other relevant information to all associates include all new joining. An appropriate complaint mechanism in the form of “Redressal Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

Redressal Committee:-

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) has been set up in Shree Krishna Paper Mills and Industries Ltd.. The detail of the committee is notified to all covered persons at the location (workplace). The committee comprises of:

1. Presiding Officer: A woman employed at a senior level in the organization or workplace
2. At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge
3. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment
4. At least one half of the total members nominated being women.

The committee will be responsible for:-

a) Addressing all complaints promptly and diligently.
b) Ensuring fairness to all parties during the investigation of Sexual Harassment complaints.
c) Conducting inquiries and recommend appropriate actions in accordance with the Act, the policy of the organization, and relevant laws.
d) Uphold principles of natural justice and treat all involved parties with dignity and respect.
e) Submitting the inquiry report along with recommendations to the Employer.
f) Submitting annual reports to designated District Officers.
g) Maintaining strict confidentiality of complaint and inquiry information, handling it discreetly.

Procedure for Dealing with Complaints:-

A. **Informal Resolution Options**:- When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. **Complaints**:-
An 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 Presiding Officer or any Member of the IC. The complaint shall have to be in writing, and can be in form of a letter, made within a period of three (3) months from the date of incident and in case of a series of incidents, within a period of three (3) months from the date of last incident. This may be extended for a further period of three (3) months, if circumstances warrant such extension in the opinion of the ICC. The legal heir or representative of the aggrieved person may make a complaint in the event of the aggrieved person's death or physical or mental incapacity.
Alternately, the employee can send complaint through an email on (**cs@skpmil.com**). The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

On receipt of a complaint, the ICC will acknowledge the receipt of the email/written letter by the Complainant within 7 working days. The further process of inquiry to be followed will be explained to the Complainant in their first meeting with the ICC

It is important for the Complainant to understand that even though the process is confidential, the Respondent will be informed of the Complainant and any Witnesses and persons directly involved in the complaint process will also learn of the Complainant's identity

If the Presiding Officer of the Internal Committee determines that the allegations constitute an act of sexual harassment and falls within the jurisdiction of ICC, she will proceed to investigate the allegation with the assistance of the Internal Committee.

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.

The Complaints Committee shall conduct such investigations in a timely manner and finish the inquiry process within ninety (90) days from the date of receipt of the complaint.

The ICC shall follow principles of natural justice and fairness in all its proceedings and will maintain confidentiality of the identity of the Complainant, the Respondent and any Witness involved with the inquiry.

ICC has the right to call upon and examine the Witnesses provided by the Complainant and the Respondent and any other person as they deem fit to the inquiry.

No legal practitioner can represent any party at any stage of the inquiry process.

The ICC has to submit a written report within 10 days of completion of inquiry containing the findings and recommendations to the Executive Director & Head-HR&A. The Executive Director & Head-HR&A will ensure corrective action on the recommendations of the Internal Committee and keep the complainant informed of the same.

During the pendency of an inquiry, on a written request made by the woman Complainant, the ICC may recommend the following to the Management of the Company:

- Transfer the Complainant or the Respondent to any other location or office of the Company;
- Grant leave to the Complainant for a period upto three (3) months;

Corrective action may include any of the following:

1. Formal apology
2. Counselling
3. Written warning to the perpetrator and a copy of it maintained in the employee's file.
4. Change of work assignment / transfer for either the perpetrator or the victim.
5. Suspension or termination of services of the employee found guilty of the offence

C. Determination Of Compensation:

The factors to be considered in determining the sums to be paid to the aggrieved person: -

➢ the mental trauma, pain, suffering and emotional distress caused to the aggrieved person.

➢ the loss in the career opportunity due to the incident of sexual harassment.

➢ medical expenses incurred by the victim for physical or psychiatric treatment.

➢ the income and financial status of the respondent.

➢ feasibility of such payment in lump sum or in installments.

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 interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

Safety of 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.

Complaints Made With A Malicious Intent:-

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his / her

image in the company and to settle personal / professional scores; strict action will be taken against the complainant. The employees who are victims of sexual harassment may in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

Amendment:-

Any subsequent amendment / modification in the Listing Regulations or the Act or any other governing Act / Rules / Regulations or re-enactment, impacting the provisions of this Policy, shall automatically apply to this Policy and the relevant provision(s) of this Policy shall be deemed to be modified and / or amended to that extent, even if not incorporated in this Policy.

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.

Dissemination Of The Policy:-

A copy of this policy shall be circulated amongst all the employees of the Company. Further, a copy of the Policy would be uploaded in the website www.skpmil.com

ANNEXURE-A

INTERNAL COMPLAINTS COMMITTEE AT SHREE KRISHNA PAPER MILLS & INDUSTRIES LTD.

S.NO	NAME OF THE MEMBER	DESIGNATION
1.	Ms. Ritika Priyam	PRESIDING OFFICER
2.	Ms. Shaila Sunil	INTERNAL MEMBER
3.	Mr. Sanjiv Kumar Agarwal	INTERNAL MEMBER
4.	Ms. Archana Bansal	EXTERNAL MEMBER WOMAN EMPOWERMENT WING, GLOBIZ FOUNDATION (NGO)