



GANDHAR OIL REFINERY (INDIA) LIMITED

SEXUAL HARASSMENT POLICY

Registered Office:

18th Floor, DLH Park, S.V. Road, Near MTNL,
Goregaon West, Mumbai 400 062, India
CIN : U23200MH1992PLC068905
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E-mail : sales@gandharoil.com
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OBJECTIVE & SCOPE:

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

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.

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

SCOPE:

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking visit.

Policy is against sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsource employees. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

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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 social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

Sexual Harassment at the workplace includes:

1. unwelcome sexual advances (verbal, written or physical),
2. demand or request for sexual favours
3. any other type of sexually-oriented conduct
4. verbal abuse or 'joking' that is sex-oriented

RESPONSIBILITIES:

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

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

MECHANISM:

An appropriate complaint mechanism in the form of "**Complaints Committee**" has been created in the Company for time-bound redressal of the complaint made by the victim.

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the Complaints Committee will comprise of the following three members.

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- i. Head- HR
- ii. Divisional Personnel Head of the Division from where the complaint has originated (Member)
- iii. Head of Legal Department

RESPONSIBILITY OF COMMITTEE:

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

PROCEDURES

1. An employee with a harassment may make a formal complaint to the Head of HR. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email.

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.

2. The Head HR of the Complaints 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 30 days from receipt of the complaint. Presiding Officer will record this finding with reasons and communicate the same to the complainant.
3. If the Head HR of the Complaints 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.
4. 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.

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5. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Executive Director & Head- HR will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include:

- a. Formal apology
- b. Counselling
- c. Warning Letter / Transfer / Suspension / termination

CONFIDENTIALITY:

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.

DOCUMENTATION:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

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.

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