CIN: [U01100GJ2021PLC126500]

Reg. Office: 12, Manu Panchal Industrial Estate, Nr. Indira Nagar, Amraiwadi Road,

Ahmedabad, 380026, Gujarat, India.

Email Id: farmpeacefpo@gmail.com
Contact: +91-9879245417

Website: www.farmpeace.in

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

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8. DEALING WITH THE COMPLAINT:

Given that this policy highlights a prevention 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 / Woman representative of the location) may be the point of first contract for anyone seeking informal support/intervention to stop unwelcome behaviour.

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 person's actions, words, behaviour is doing and convey in no uncertain terms that such behaviour is not appreciated. What is important is the "Way" a particular behaviour, 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 need to be reported to the Head of HR who will then provide a short report to the Internal Complaints Committee and the matter will be disclosed.
- 4. However, in the event of if 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 behaviour of sexual harassment by a co- worker towards another employee.
- 2. The concerned employee shall give his complaint in writing to any of the committee member giving details of the incidence within a week of its occurrence.
- 3. Once the complaint is received, it will be kept strictly confidential.

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4. The person accused will be informed that a complaint has been filed against him/ her and no unfair acts of retaliation or unethical action will be tolerated The Committee shall ensure that affair and just investigation is undertaken immediately.

- 5. Both the complainant and the alleged accused 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.
- 6. The Chairperson after studying the report & discussion with the Committee members shall submit her recommendation to the Managing Director within 10 days of completing the inquiry.
- 7. The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly. The implementation of the recommendation of Internal Complaint Committee by Managing Director should be done within 30 days of receipt of such recommendation.

9. DISCIPLINARY ACTION:

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

10. 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.

11. ACCESS TO REPORTS AND DOCUMENTS:

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.

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12. . 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.

13. LODGING A FALSE COMPLAINT:

- a. If, based on investigations, the company arrives at the conclusion that a prima facie case of harassment has not been made out against an employee and that the charges were brought falsely, and with malicious intent the company will initiate appropriate disciplinary action which may include termination of the employee who falsely accuse another in accordance with the Company's Disciplinary procedures.
- b. All records of sexual harassment reports and investigation shall be considered confidential and shall not be disclosed publicly except to the extent required by law.

14. THIRD PARTY HARASSMENT:

When sexual harassment occurs because of an act or omission by any third party or outsider, the Company will take steps necessary to assist the affected employee in terms of support and prevention action within the legal norms.

15. 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.

FARM PEACE LIMITED

DIRECTOR

AHMEDABAD TO