



DIVYA JYOTI INDUSTRIES LIMITED
CORPORATE POLICY ON SEXUAL HARASSMENT

1. POLICY

Divya Jyoti Industries Limited is an equal employment opportunity company that is committed to ensuring that the work environment enables employees to work without fear of prejudice, gender bias and sexual harassment. We also believe that all employees in the organization have a right to be treated with dignity and that no employee is disadvantaged by way of gender discrimination. We would, however, like to ensure that there is absolute clarity on the important and sensitive issue of sexual harassment. This note therefore further elucidates the company's approach to the issue of sexual harassment and its policy for dealing any incidence of such kind.

2. SCOPE OF THIS POLICY

This policy applies to all individuals who are employed in permanent or temporary capacity at its workplace, including workmen, trainees and employees, permanent or on contract.

The 'workplace' includes:

- i. All offices or other premises where the company's business is conducted.
- ii. All company-related activities performed at any other site away from the company's premises.
- iii. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

This document shall also be applicable to all locations associated with the Company with a clear objective to establish a similar approach in dealing with this issue.

3. DEFINITION OF SEXUAL HARASSMENT

A broad definition of sexual harassment consists of any physical or verbal behavior and any form of communication that has unnecessary, improper or has unwelcome sexual connotations. Sexual harassment may vary in form depending on circumstances. It may consist of, but not be limited to, any of the following:

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Registered Office: M-19-39, Sector – III, Industrial Area, Pithampur-454775 Dist. Dhar (M.P.) Ph. +91-7292-421900-901, Fax: +91-7292-421947, E-mail: works@divyajyoti.net Web: www.divyajyoti.net

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- i. Unwelcome sexual advances, requests for sexual favors, display of sexual visual, audios, pornographic or obscene material and any other verbal or physical conduct of sexual nature.
- ii. Transmitting any message by SMS, telephone. E-mail etc. which is obscene, lewd, suggestive or blatantly sexual in nature.
- iii. Any explicit or implicit communication where in a sexual favor or demand, whether by words or actions, is made a condition for an individual's employment, career progress, promotion etc. hereby creating a hostile environment.
- iv. Sexually charged jokes or remarks and behavior which have sexually oriented innuendoes.
- v. Consistent pattern of unnecessary physical contact, staring or targeting unreasonable attention at an individual in day to day dealings.
- vi. Any pervasive pattern of behavior which makes employees uncomfortable, insecure, humiliated or disadvantaged on the basis of gender differentiation.
- vii. Actual sexual assault.

As mentioned above, this is an indicative but not an exhaustive list of possible forms of sexual harassment.

4. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

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.

5. COMPANY POLICY ON SEXUAL HARASSMENT

The Company policy is to totally prohibit any form of sexual harassment in the way employees behave with each other. This would also include complaints relating to instances outside of the work place. This applies equally to relations between superior and subordinates as well as between peers. Any incident of sexual harassment will be viewed extremely seriously. A complaint or report pertaining to it will be immediately investigated and appropriate action will be taken against the offending employee or employees. Such action will depend on the nature and seriousness of the offence and may also include strict disciplinary action including termination of service.

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6. COMPLAINT HANDLING PROCESS

The company has established the following process to ensure that any incidence of sexual harassment is dealt with appropriately, sensitively and expeditiously.

7. COMMITTEE FOR SEXUAL HARASSMENT

The company has constituted a Committee for Sexual Harassment for redressal of complaints which shall be chaired by **Mrs. Babita Nyati**. The names of the members of this Committee are given below:

- i. Mrs. Babita Nyati
- ii. Mrs. Sapna Bakliwal
- iii. Mrs. Jolly Benny
- iv. Mr. Sanjay Baweja

Mr. Gopal Nyati, Executive Director of the company, will mentor, guide and support the smooth functioning of this Committee.

8. PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT

- i. Any employee who experiences any incident related to sexual harassment shall need to report the incident to any member of the Committee. The complaint shall have to be in writing and can be in form of a letter, preferably with 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternatively, the employee can send complaint through an e-mail. The employee is required to disclose her name, department, division and location she is working in, to enable the chairperson to contact her and take the matter forward.
- ii. On receipt of such a complaint, the committee will immediately investigate the matter. It shall do so with all possible care, sensitivity and discretion in protecting the sensibilities of the effected employee. The employee or employees, who have allegedly committed the offence, would be given all reasonable opportunity to be heard by the Committee.
- iii. The result of investigation will be formally recorded and communicated to the Executive Director of the Company, along with the recommendation for appropriate action within 21 days after receiving the complaint unless there are exceptional circumstances.

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- iv. Appropriate action shall be taken against the offender basis, the recommendation of the Committee and seriousness of the offence.
- v. Where the company is legally advised that any such incident constitutes a criminal offence, it will inform the relevant authority, provide full details and request appropriate action. If the aggrieved employee directly takes any action against the offending employee, either civil or criminal, the Committee on becoming aware of such action by the aggrieved employee shall be entitled to suo motto, start the internal enquiry/ investigation and recommend appropriate action.
- vi. The company will ensure that the career interests of the complainant are not adversely affected by virtue of the individual having drawn attention to such an offence.
- vii. In order to ensure that this important matter is not trivialized, any complaint, which in the opinion of the Committee is blatantly false or frivolous or has been motivated by reasons that are clearly unconnected with gender issues, would be viewed very seriously by the company and appropriate action taken against such complainants.
- viii. If the committee receives an anonymous reference related to sexual harassment, it will draw the attention of the senior executives concerned with the relevant business or location. The matter will be fully examined by the concerned senior management and its conclusions and plans for necessary action will be communicated to the Committee.
- ix. Heads of departments and senior executives at all company locations will also be expected to be sensitive to any circumstances or behavior among their colleagues which appear to go against the company policy on this matter. In case they become aware of any such incidence, they will immediately inform the head of the Committee and take appropriate action as advised.

Approved By
Gopal Nyati
Executive Director

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