



POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Policy on Board Diversity

1. Purpose:

The policy on Board Diversity ("Policy") sets out the approach for diversity of the Board of Directors ("the Board") of Sunshield Chemicals Limited ("the Company").

The Company recognizes the importance and benefits of having a diverse Board to enhance quality of its performance.

2. Applicability:

This Policy applies to the Board of Directors of the Company.

3. Policy Statement:

The Company recognises and embraces the benefits of having a diverse Board to enhance the quality of its performance.

In designing the Board's composition, Board diversity shall be considered from a number of aspects, including but not limited to gender, age, cultural and educational background, ethnicity, professional experience, skills, knowledge and length of service.

The Board shall have an optimum combination of executive, non-executive and independent directors including women directors in accordance with the requirements of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The Board's composition is disclosed in the Company's Corporate Governance Report annually.

A diverse Board shall contribute to the achievement of the Company's objectives.

4. Nomination and Remuneration Committee Role

The Nomination and Remuneration Committee ('Committee') shall review and report any changes in relation to the diversity of the Board. The Committee shall also review Board composition in terms of the size of the Board, the composition of executive and non-executive directors and the composition of independent directors, each of which shall be in accordance with the requirements of the Articles of Association of the Company, the Companies Act, 2013, the Listing Agreements and other statutory / regulatory requirements.

5. Review and Amendment:

The Nomination and Remuneration Committee shall review this Policy periodically to ensure effectiveness of this Policy and recommend appropriate revisions to the Board for consideration and approval.

Objective

Sunshield Chemicals Limited (hereinafter referred to as “Sunshield”) is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. Sunshield 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.

Scope:

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

The workplace includes:

- a) All offices, plants or other premises where Sunshield’s business is conducted.
- b) All Sunshield related activities performed at any other site away from Sunshield’s premises.
- c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

What is sexual harassment?

Sexual harassment may be one or a series of incidents involving unwelcoming sexually determined behavior as physical contacts and advances, sexually coloured remarks, showing pornography and sexual demands, whether by words or actions

Sexual Harassment at the workplace includes:

- i. physical contact and advances;
- ii. a demand or request for sexual favours;
- iii. making sexually coloured remarks;
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

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.

Internal Complaints Committee (ICC)

Sunshield Chemicals Limited a has constituted an ICC to comply with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Presently ICC comprises of the following members:

Name	Contact Number	Email ID
Dr. Maya Parihar Malhotra	022-25550126	maya@sunshieldchemicals.com
Mrs. Sujata Ashtekar	+919819226332	ashtekarsujata@yahoo.in
Mr. Kishore Page	+919209594579	kishor.page@sunshieldchemicals.com
Mr. Amit Kumashi	+918976777028	amit.kumashi@sunshieldchemicals.com

The ICC shall be responsible for:

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

Procedures for Resolution, Settlement or Prosecution of Acts of Sexual Harassment

Complaint

Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Complaints Committee ('Committee') within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.

The Committee may consider a complaint lodged beyond a period of three months, if it is satisfied with the reasons/circumstances (to be recorded in writing) which prevented the aggrieved woman from filing a complaint within the said period.

Redressal of Complaint

Conciliation

The Committee may, before initiating any inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation.

Where a settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same to the Board of Directors to take necessary action in this regard.

The copies of settlement shall be provided to the aggrieved woman employee as well as respondent.



Where a settlement is arrived at, no further inquiry shall be conducted by the Committee. Provided that where the aggrieved woman informs the Committee, as the case may be, that any term or condition of the settlement arrived at has not been complied with by the respondent, the Committee shall proceed to make an inquiry into the complaint.

Inquiry

If no conciliation is possible, as stated above, ICC shall conduct the inquiry into the complaint. During the course of inquiry, the parties be given an opportunity of being heard and the copy of finding will be made available to the parties enabling them to make representations against the findings before ICC.

The aforesaid inquiry shall be completed within a period of ninety days.

On completion of inquiry, ICC shall provide a report to the Employer within a period of 10 days of completion of inquiry and such report shall also be made available to the parties.

Inquiry Report and Action

Where the Committee arrives at the conclusion that the allegation against the respondent has not been proved, then no action is required to be taken in the matter

Where the Committee and Board of Directors together arrive at the conclusion that the allegation against the respondent has been proved, it may take any of the following actions depending upon the circumstances:

- a. Formal apology
- b. Counselling
- c. Written warning to the Respondent and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the Respondent or the Complainant.
- e. Suspension or termination of services of the employee found guilty of the offence

Where the Committee arrives at a 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 or any other person making the complaint has produced any forged or misleading document, the Complainant shall, be liable for appropriate disciplinary action by ICC.

Meetings of ICC

The ICC will meet periodically to review the complaints received and action taken to redress the complaints.

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.

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.

General

The provisions of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 shall be applicable in addition to this Policy.