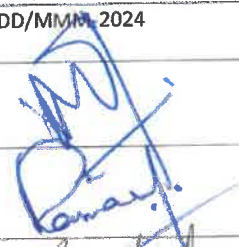
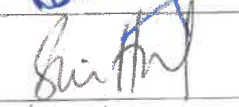


PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE POLICY

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1. OBJECTIVE AND APPLICABILITY

The objective is to ensure that Greenpanel Industries Limited implements the policy in letter and spirit by undertaking all necessary and reasonable steps to provide a safe environment free of discrimination and violence against women. Greenpanel Industries Limited is clearly outlining and actively discouraging non-acceptable actions / behaviors which are intended to harass women working (directly / indirectly) at Greenpanel.

At Greenpanel, we have zero-tolerance for sexual harassment. We value stakeholders associated with us, and we are committed to protect their dignity and self-respect. In doing so, we are determined to promote a working environment which is safe and secure for women employees.

This policy incorporates the provisions of the enacted THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013. As the name indicates, the objective of the legislation is the protection of women at the workplace from any form of overt or covert sexual harassment by providing a redressal mechanism for complaints of this nature.

2. SCOPE

Greenpanel Industries Limited's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "Women employee" across the Organization. Greenpanel Industries Limited encourages every Women employee/ associate who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

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 organization for undertaking such visit.

This Policy comes into force with immediate effect.

3. DEFINITION

“Employee”: Employee means a person employed at the workplace for any work on regular, temporary, ad hoc, or daily wage basis, either directly, or through an agent, including a contractor, 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, contract worker, probationer, trainee, intern or called by any other such name. It also includes any visitor who visits Greenpanel premises; or any person who is a temporary resident of any of the accommodations or premises allotted by Greenpanel.

“Employer”: means any person responsible for the management, supervision and control of the workplace.
CE -“Complainant Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, a contract worker, whether for remuneration or voluntary and includes a probationer, trainee, apprentice or called by any other such name.

RE - “Respondent Employee” means a person against whom a person has made a complaint.

ICC - means an “Internal Complaints Committee”.

“Management” includes a person, or board of directors, or a committee, responsible for formulation and administration of policies of the Organization.

“Sexual Harassment” at Workplace is defined as:

Such unwelcome sexually determined behaviour (whether directly or by implication) as:

- a. Physical contact and advances.
- b. A demand or request for sexual favors.
- c. Sexually colored remarks, including but not limited to, sexually colored jokes, innuendos and taunts causing or likely to cause awkwardness or embarrassment.
- d. Showing and/or sharing pornography or other offensive or derogatory pictures, cartoons, pamphlets or sayings.
- e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- f. Eve-teasing gender-based insults or sexist remarks.
- g. Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls), text messages, e-mails or on social media.
- h. Intentionally touching or brushing against the body, forcible physical touch or molestation
- i. Physical confinement against one's will and any other act likely to violate one's privacy; or
- j. Any action (either individually or coupled with any of the above) which may include, but not limited to may also amount to sexual harassment:
 - Implied or overt promise of preferential treatment in employment; or
 - Implied or overt threat of detrimental treatment in employment; or
 - Implied or overt threat about the present or future employment status
 - Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or
 - Humiliating conduct constituting health and safety problems.

“Workplace” means any department, division or any other work premises where work connected with the affairs of the Company are being carried out. It also includes any place visited by employee(s) arising out of or during the course of employment including transportation provided by the employer for undertaking such journey. It also includes any such location where an employee visits to carry out the Company’s business or attend any seminar, training, conferences, etc. or attend a function including a get-together organized by the Company.

Internal Complaints Committee (ICC), Every complaint received under POSH will be taken up by the internal complaint committee (ICC). Internal Complaints Committee is constituted for this purpose and shall carry out all necessary investigations. The Company shall have an Apex Committee that oversees the functioning of the location-wise Internal Committees.

ICC shall consist of the following members:

- A Presiding officer: a senior level woman employee.
- One employee preferably having legal knowledge or experience in social work.
- One external member who has relevant knowledge and experience or may be from an NGO or association that deals with such matters
- At least one-half of the total number of members will be women.

The Presiding officer and every member of the ICC will hold office for a period not exceeding three years.

4. COVERAGE

This Policy extends to all employees of Greenpanel Industries Limited.

5. VERSION CONTROL

The Human Resource of Greenpanel Industries Limited shall be the custodian of this policy. The Policy shall be reviewed on a regular basis, as and when needed by the senior management of Greenpanel. Any revisions to the existing Policy and reconstitution of Internal Complaints Committee (ICC) may be done with the approval of MD & CEO of the Company (Greenpanel Industries Limited.).

6. INTERNAL COMMITTEE

The Internal Committee has been formed across sites and locations for timely redressal of complaints dealing with sexual Harassment. (Refer to Annexure I)

7. PROCEDURE FOR REGISTERING COMPLIANT

- The Complaint must be lodged with ICC within three (3) months from the date of incident and in case of a series of incident, within a period of three from the date of last incident.
- Any aggrieved women Employee may make a complaint in person or in writing, either directly to the Internal Complaints Committee or through, her immediate supervisor, or human resources business partner or head of human resources to the Internal Committee.
- Where the aggrieved women is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or dependent as mentioned in the HR records or otherwise may make a complaint on her behalf.

- If the complaint is oral, it shall be converted in writing by her immediate supervisor, or human resources representative and then handed over to the Internal Complaints Committee. with full authentication by the complainant under her dated signature or thumb impression, as the case may be.
- The Internal Complaints Committee member, who receives the complaint, will make a record of the same and provide an acknowledgement.
- The Internal Complaints Committee will ensure complete confidentiality of the complaint made.

8. PROCEDURE FOR HANDLING COMPLAINTS AND ENQUIRY

- 8.1 The ICC would go through the details of the complaint and evaluate if there is a prima facie case or not. While doing that, ICC will keep in mind that the CE is not subjected to enquiry more than once. However, if the complaint complexity requires that the CE is to be called for more than once for enquiry, then utmost sensitivity should be displayed, and adequate precaution would be taken to ensure that there is no loss of dignity to the CE.
- 8.2 The ICC will initiate a detailed enquiry as deemed fit.
- 8.3 The ICC may before initiate an inquiry, on a request from the CE, take steps to settle the matter between her and the RE through conciliation. No monetary settlement shall be made a basis of conciliation. Where a settlement has been arrived during the conciliation proceedings, ICC shall record the settlement so arrived; share a copy each with the complainant employee as well as the respondent employee followed by taking a suitable action as per the settlement. Where a settlement has been arrived post conciliation, no further inquiry shall be conducted.
- 8.4 The CE may inform the ICC if any such settlement is not complied with and in such a case, the ICC shall proceed with an inquiry, allowing both parties to explain their case as well as submit any evidence in support of their statements.
- 8.5 The ICC shall handover one copy of the Complaint to the accused person within a period of 7 working days of receipt of the complaint and give him the time not exceeding 10 working days to respond.
- 8.6 During the pendency of the inquiry, on a written request made by the complainant employee, the ICC may recommend any relief to the CE including:
- a) Transfer of the CE or the RE to any other workplace; or
 - b) Grant leave to the CE up to a period of three months that will be in addition to any other entitled leave.
- 8.7 For the purpose of making an inquiry, the ICC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit in respect of the following matters, namely:-
- a) Summoning and enforcing the attendance of any person and examining on oath;
 - b) Requiring the discovery and production of documents/records; and any other matter which may be prescribed
- 8.8 When an enquiry is completed, the report on findings shall be sent to the management within 10 days of such completion and a copy shall be given to the complainant employee and respondent employee.

An opportunity will also be provided to the concerned parties to make representations to the committee if either or both do not agree with the findings.

8.9 The ICC shall after completing the enquiry, submit its final reports to the Management with recommendations of the penalty to be imposed.

8.10 The submission of the recommendations by the ICC to the Management shall be completed within a period of ninety days (90) from the date of receipt of the complaint by the ICC.

8.11 If the allegations are not proven, no action will be recommended by the ICC.

8.12 In case proven, if the ICC concludes that there is some basis for the complaint, it will recommend:

a. Deduction from the salary or wages of the RE, such sum as it may consider appropriate to be paid to the aggrieved or to her legal heirs. To determining the sum to be paid, the ICC would consider:

- i. The mental trauma, pain, suffering and emotional distress caused to the CE.
- ii. The loss in career opportunity due to the incident of sexual harassment.
- iii. Medical expenses incurred by the victim for physical or psychiatric treatment.
- iv. The income and financial status of the RE.
- v. Feasibility of such payment in lump sum or in instalments.

b. Disciplinary action like written apology, reprimand or censure, withholding of promotion, withholding of pay rise or increments and termination of employment.

8.13 The organization shall act upon the recommendation within sixty days of its receipt.

8.14 The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.

9. PUNISHMENTS FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE

Where the ICC arrives at a conclusion that the allegation against the RE is malicious or the CE has made the complaint knowing it to be false or the CE has produced forged or misleading document, it may recommend to the Management of the establishment to take action against the CE.

10. PROHIBITION OF PUBLICATION OR MAKING KNOWN CONTENTS OF COMPLAINT AND INQUIRY PROCEEDINGS

The contents of the complaint, the identity and addresses of the complainant employee, respondent employee and witnesses, any information related to conciliation and inquiry proceedings, recommendations and the action taken shall not be published, communicated or made known to the public, press and media in any manner. Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved or witnesses.

11. REVISION OF RECOMMENDATIONS

Any person who does not agree with the recommendations made or non- implementation of such recommendations may prefer an appeal to the court in accordance with the provisions of the employment

agreement. The appeal shall be preferred within a period of ninety days of the recommendations.

12. PROTECTION AGAINST VICTIMIZATION

The Company will ensure that any person who has lodged a complaint in good faith is protected and not victimized. If for any reason, the complainant employee is victimized, it will be treated as a serious offence with suitable disciplinary action and punishment against the perpetrator.

13. OBLIGATION OF THE MANAGEMENT

13.1 The management of the Company will provide all necessary assistance towards ensuring full, effective and speedy implementation of this policy.

13.2 Organize workshops and awareness programs for employees at regular intervals.

13.3 Carry out orientation programs, seminars and skill building programs for the members of ICC.

14. THIRD PARTY INVOLVEMENT

Where sexual harassment occurs because of an act or omission by any third party or outsider, Greenpanel will take all steps necessary and reasonable to assist the affected employee in terms of support and preventive action.

15. ANNUAL REPORT

The ICC will submit an annual report to the Management. The Management will conduct periodic update meetings with the ICC to ensure that the said policy is being implemented in letter and spirit. The annual report shall include the following:

- a) Number of complaints received during the year.
- b) Number of complaints disposed of during the year.
- c) Number of cases pending for more than 90 days.
- d) Number of workshops or awareness programme carried out.
- e) Number of actions taken by the employer.

---End---

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