

PAJSON AGRO INDIA LIMITED



PAJSON AGRO INDIA LIMITED
(Formerly Pajson Agro India Pvt Ltd)

**POLICY ON SEXUAL
HARASSMENT OF WOMEN
AT WORKPLACE
(PREVENTION,
PROHIBITION, AND
REDRESSAL) ACT, 2013
(POSH)**

Revised Dated 26.12.2025

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1. INTRODUCTION AND OBJECTIVE

Pajson Agro India Limited (the “Company”) strives to create and maintain a healthy, safe and productive work environment, free from discrimination and harassment. The Company strives to provide equal opportunity and a harassment free workplace to all employees without regard to race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability.

The Company is therefore committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.

Accordingly, this Policy has been framed with the intention of preventing Sexual Harassment at workplace, that includes prohibition and redressal of sexual harassment.

At Pajson, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to -

- Treat each other with dignity and respect
- Follow the law in letter and spirit
- Refrain from any unwelcome behavior that has sexual connotation
- Refrain from creating hostile atmosphere at workplace via sexual harassment
- Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.

2. SCOPE AND COVERAGE

This policy considers the definition of Right to life, under the Constitution of India. It means the right to life with dignity and the fundamental right to carry on any occupation, trade or profession, which depends on the availability of a "safe" working environment where employees feel secure and truly believe that their dignity is maintained.

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This policy takes complete cognizance of the latest legislation by the Government of India “The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013 and its rules published on 9th December 2013. This Act is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

3. DEFINITIONS

(a) **“Sexual Harassment”** - Sexual Harassment may include any of the following but not limited to:

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit;
- Physical contact and advances;
- Demand or request for sexual favors;
- Sexually colored remarks, including but not limited to vulgar / indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtone, molestation;
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas;
- Verbal or non-verbal communication which offends the individuals’ sensibilities and affect performance and has sexual connotation/ overtone/ nature;
- Teasing, innuendos and taunts, physical confinement and /or touching against one’s will and likely to intrude upon one’s privacy.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment -

- Implied or explicit promise of preferential treatment in the employment
- Implied or explicit threat or detrimental treatment in the employment
- Implied or explicit threat about the present or future employment status

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- Interference with the work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety

An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

- (b) **“Aggrieved Individual”**- An Aggrieved Individual, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.
- (c) **“Complainant”** - A Complainant is any Aggrieved Individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.
- (d) **“Employee”** - An Employee means a person employed with the Company for any work on permanent, temporary, part time, adhoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, 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, a contract worker, probationer, trainee, apprentice or called by any other such name.
- (e) **“Respondent”** - A Respondent means the person against whom the Complainant has made a complaint.
- (f) **“Special Educator”** - A Special Educator means a person trained in communication with people with special needs in a way that addresses their individual differences and needs.
- (g) **“Workplace”**
 - Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, and controlled by the Company.
 - Places 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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4. INTERNAL COMPLAINTS COMMITTEE (NOW KNOWN AS INTERNAL COMMITTEE) FOR PROCESSING UNIT & REGISTERED OFFICE

i) The Company has constituted an Internal Complaints Committee (ICC) – also known as the * POSH Committee consisting the following:

Internal Complaints Committee for Processing Unit (Janakiramapuram):

Sr. No	Name	Designation
1.	S Swathi	Presiding Officer
2.	Kuncham Parwathi	Member
3.	Sabbavarapu Varahamma	Member
4.	Surla Lokeswari	Member
5.	Panchada Laxmi	Member
6.	Vantakula Rajyalaxmi	Member
7.	Nakka Laxmi	Member
8.	Dhaniyala Nagalaxmi	Member
9.	Raghuram	Member
10.	K. Manikanta	Member
11.	Harshini	External Member

Internal Complaints Committee for Registered Office (New Delhi):

Sr. No	Name	Designation
1.	Srishti Gulati	Presiding Officer
2.	Bhupender Singh	Member
3.	Vineet Chauhan	Member
4.	Komal Gambhir	External Member

ii) The Presiding Officer and every member of the ICC shall hold office for a period not exceeding three years, from the date of their nomination.

iii) A member of the ICC may resign at any time by tendering his resignation in writing to the Company.

**The company has reconstituted the Janakiramapuram Internal Committee as per subsection 3 of Section 4 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 vide approval of the Board of Directors in its meeting held on 25.02.2025 and New Delhi Internal Committee was constituted vide approval of the Board of Directors in its meeting held on 26.12.2025.*

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5. **Removal or Replacement of ICC member or Presiding Officer** - In the event that the Presiding Officer and / or any member of the ICC:

- contravenes any provisions of the Policy; or
- has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- has so abused his / her position as to render his / her continuance in office prejudicial to public interest, such Presiding Officer or member as the case may be, shall be removed from the ICC. Any vacancy created due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by the Company in accordance with the appropriate guidelines.

6. **PROCESS**

1) **Complaint of Sexual Harassment**

- i) A Complainant can make, in writing, a complaint of Sexual Harassment to the Internal Complaints Committee (ICC), 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 ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the said period.
- ii) If the Aggrieved Individual is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by:
 - his/her relative or friend; or
 - his/her co-worker; or
 - an officer of the National Commission for Women or State Women's Commission; or
 - any person who has knowledge of the incident, with the written consent of the Aggrieved Individual
- iii) If the Aggrieved Individual is unable to make a complaint on account of his/her mental

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incapacity, a complaint may be filed by:

- his/her relative or friend; or
 - a special educator; or
 - a qualified psychiatrist or psychologist; or
 - the guardian or authority under whose care he/she is receiving treatment or care; or
 - any person who has knowledge of the incident jointly with the Aggrieved Individual's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care.
- iv) If the Aggrieved Individual for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his/her written consent.
- v) If the Aggrieved Individual is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.
- vi) The form in which the complaint is required to be made is annexed as **Annexure 1** to the Policy. This form will be available with the ICC. However, any written complaint received in any form other than the form prescribed in **Annexure 1** shall also be accepted. The complaint can be submitted to the ICC electronically at **hr@pajsonagro.com** or may be physically submitted to any ICC Presiding Officer. The ICC may, but shall not be bound to, accept oral complaints under this Policy.
- vii) The Complainant shall submit six copies of the complaint along with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses.

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2) Conciliation

Prior to initiating an inquiry, the ICC may, at the request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement is made the basis of such conciliation. In case a settlement has been arrived at the ICC, shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation of the ICC.

The ICC will provide copies of the settlement as recorded to the Complainant and the Respondent. Upon a conciliation being reached, the ICC would not be required to conduct any further inquiry.

3) Inquiry

- i) Subject to the above and in the event of any term or condition of the settlement not been complied with by the Respondent, the ICC shall conduct an inquiry regarding the complaint.
- ii) On receipt of the complaint, the ICC shall send one of the copies received from the Complainant to the Respondent within a period of seven working days.
- iii) The Respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents.
- iv) The ICC shall make an inquiry into the complaint in accordance with the principles of natural justice. The ICC must notify in writing, the time and dates of its meetings to the Company, the Complainant and the Respondent, not less than 5 days in advance of any such meeting.
- v) While conducting the inquiry, a minimum of three members of the ICC including the Presiding Officer or Chairperson, as the case may be, shall be present.
- vi) The ICC shall have the powers to summon and enforce the attendance of any person and

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conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.

- i) The ICC shall have the right to terminate the inquiry proceedings or to give an ex- parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Chairperson or Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- ii) The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the complaints committee. However, they may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the ICC.
- iii) All colleagues and witnesses who are part of the ICC proceedings will need to sign a confidentiality agreement
- ix) During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC.
- ix) The inquiry shall be completed within a period of ninety days from the date of receipt of the complaint.

4) Action during Pendency of Inquiry

- i) During the pendency of an inquiry, on a written request made by the Complainant, the ICC may recommend the following to the Company:
 - transfer the Aggrieved Individual or the Respondent to any other workplace
 - grant leave to the Aggrieved Individual up to a period of three months
 - grant such other relief to the Aggrieved Individual as may be prescribed under applicable law

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- restraint the respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer
- ii) The leave granted to the Aggrieved Individual shall be in addition to the leave he/she is otherwise entitled to.
- iii) On receiving a recommendation from the ICC, the Company shall implement the recommendations and send a report of such implementation to the ICC.

5) Inquiry Report and Actions

- i) On the completion of an inquiry the ICC shall provide a written report of its findings to the Company within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
- ii) In the event that the ICC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.
- iii) Where the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to the Company to take action against the Respondent, which may include:
 - a written apology from the Respondent
 - a letter of warning may be placed in the personal file of the Respondent
 - reprimand or censure
 - immediate transfer or suspension without pay
 - termination from service
 - withholding of pay rise or increments
 - undergoing a counseling session
 - carrying out community service
 - register an FIR against the Respondent in case the act alleged, prima facie constitutes an offense under the Indian Penal Code
 - deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Individual or to his/ her legal heirs.

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- iv) In case the Company is unable to make deductions from the salary of the Respondent due to his being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum referred above, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.
- v) The Company shall act upon the recommendation given by ICC within sixty days of receipt of the recommendation.

6) Appeal

In the event that any person is aggrieved from the recommendations made by the ICC or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by the law, within a period of ninety days of the recommendations.

7. ROLES & RESPONSIBILITIES OF ICC

- To be fair while making the assessment of the situation, investigation and giving the verdict.
- Conduct the inquiry process and recommend appropriate actions as per the process outlined in section 6 of this document in line with the statutory requirements applicable.
- Inform the parties involved in the inquiry proceedings well in time and in writing.
- Follow the principles of natural justice and treat the complainant, respondent, witnesses and related persons to the inquiry with dignity and respect.
- Submit to the Company an annual report comprising details of all cases and actions taken.
- Keep disclosed information as confidential. Handle information in a discreet manner, and disclose confidential information strictly on a “need-to-know” basis only.
- If an employee faces sexual harassment outside of the company work and work premises, assist them in filing a complaint in the police station as appropriate.

8. AMENDMENTS

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual

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Harassment.

9. IMPLEMENTATION OF THE POLICY

The Company will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the Company. Every year, the Company will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

10. EFFECTIVE DATE

This Policy is effective from the date of approval of the same by the Board of Directors of the Company.

11. POLICY REVIEW

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) from time to time or replace the Policy entirely with a new Policy.

12. DISCLOSURES

The Company shall disclose the Policy on its website

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ANNEXURE 1

COMPLAINT FORM

1. Details of Aggrieved Individual

Name	Designation	Division & Department	Contact Numbers (Landline and Mobile)	Office Address

2. Details of Complainant (in case the Complainant is not the Aggrieved Individual)

Name	Relationship with Aggrieved Individual	Contact Numbers (Landline and Mobile)	Address

3. Details of individual alleged to have engaged in sexual harassment

Name	Designation	Division & Department	Contact Numbers (Landline and Mobile)	Office Address

4. Details of the incident(s)

Sr. No.	Nature / Description of incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses, if any

5. Has a report regarding these incidents been filed with any other agency? Yes / No . If yes, with whom?

6. Additional information and comments if any:

Signature of Aggrieved Individual:

Date:

Signature of Complainant:

Date:

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ANNEXURE 2

Sections of the Indian Penal Code (IPC) – Sexual Harassment and Punishment for Sexual Harassment

Under the Indian Penal Code, the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a ‘cognizable offense’ i.e. a person charged with Sexual Harassment may be arrested **without a warrant**.

(1) A man committing any of the following acts:

- (i) physical contact and advances involving unwelcome and explicit sexual overtures; or
- (ii) a demand or request for sexual favors; or
- (iii) showing pornography against the will of a woman; or
- (iv) making sexually colored remarks,

shall be guilty of the offence of sexual harassment.

(2) Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to three years, or with fine, or with both.

(3) Any man who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description for a term which may extend to one year, or with fine, or with both.

In addition to Section 354A set out above, acts of Sexual Harassment may also constitute other offenses under IPC including Section 354 (assault or criminal force to woman with intent to outrage her modesty), Section 354C (Voyeurism), Section 354D (Stalking), Section 375 and 376 (Rape) and Section 509 (word, gesture or act intended to insult the modesty of a woman) of the IPC.