



## **Policies**

### **HUMAN RESOURCES POLICIES**

**Policy Name: Prevention of  
Sexual Harassment**

|                            |                       |                    |  |
|----------------------------|-----------------------|--------------------|--|
| <b>Function</b>            | <b>Human Resource</b> | <b>Policy</b>      | <b>Prevention of Sexual Harassment</b> |
| <b>Management Champion</b> | <b>DH-HR</b>          | <b>Approved By</b> | <b>CEO</b>                             |
| <b>Date</b>                |                       | <b>Version No</b>  | <b>03</b>                              |

|                       |  |
|-----------------------|--|
| <b>Policy Number</b>  | TSF/HR/ALL/05  |
| <b>Effective Date</b> | <b>01-04-2024</b>  |
| <b>Objective</b>      | To protect employees from Sexual harassment at the workplace.<br>Prevention and redressal of Sexual complaints.  |
| <b>Applicability</b>  | All Employees including visitors.  |
| <b>Policy Content</b> | <p><b><u>Preamble</u></b></p> <ul style="list-style-type: none"> <li>• Toppan Speciality Films Private Limited has a zero tolerance for Sexual Harassment. TSF values every single Employee working in the Company and wishes to protect their dignity. In doing so, we are determined to promote a working environment in which people of both sexes work side by side as equals in an environment that encourages harmony, productivity and individual growth.</li> <li>• Toppan Speciality Films Private Limited has put in place this Policy and process to address any cases of Sexual Harassment, in the interest of ensuring gender equality and the right to work with dignity, which are both recognised as basic human rights and as per applicable Laws.</li> <li>• This Policy shall override and replace all previous policies in respect of Prevention of Sexual Harassment at the Toppan Speciality Films Private Limited.</li> <li>• This Policy incorporates the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 as adopted and introduced on December 09, 2013</li> </ul> <p><b><u>Purpose</u></b></p> <ul style="list-style-type: none"> <li>• Formulate, issue and widely disseminate a Policy statement for defining, prohibiting, prevention and redressal of Sexual Harassment at all Toppan Speciality Films Private Limited Offices</li> <li>• Nurture and promote a gender sensitive and safe working environment at all Toppan Speciality Films Private Limited Offices and all Toppan Speciality Films Private Limited Locations and ensure safety of those persons who come into contact at such places and eliminate underlying factors that contribute to a hostile work environment for both men and women.</li> <li>• Address sexual harassment issues promptly, confidentially, and sensitively, and establish procedures for the resolution, settlement, or prosecution of sexual harassment acts</li> <li>• Provide mechanisms for assistance and support for victims of Sexual Harassment</li> <li>• The penal consequences of sexual harassment, the constitution of the Internal Complaints Committee (defined below), and the names and details of the Internal Committee members shall be displayed prominently in all Toppan Speciality Films Private Limited offices and locations</li> <li>• Organize workshops and awareness programmes at regular intervals for sensitizing Employees with the Applicable Laws, as per Applicable Laws prescribed by the Appropriate Government.</li> </ul> |

- Provide all necessary facilities for the Internal Committee or the Local Committee to deal with the complaints.
- Assist in securing the attendance of respondents and witnesses before the Internal Committee.
- Provide the Internal Committee with any information it may require in relation to all complaints.
- Provide assistance to the Aggrieved Woman in filing a Complaint under the IPC or any other applicable Laws (defined below).
- Cause to initiate action, under the IPC, or other Applicable Laws, against the Respondent or if the Aggrieved Woman or the Aggrieved Person desires, where the perpetrator is not an Employee, at any of the Toppan Speciality Films Private Limited Office(s) where the incident of Sexual Harassment took place.
- Treat all Sexual Harassment cases against Aggrieved Women as misconduct and deal accordingly.
- Monitor timely submission of Statutory Reports by the Internal Committee and compliance with disclosure requirements in the Annual Report.
- Carry out orientation programs and conduct capacity and skill building programs for all Members as per Applicable Laws prescribed by the Appropriate Government.
- Carry out Employee awareness programmes and create forum for dialogues which may involve Panchayati raj institutions, gram Sabha, women's groups, mother's committee, adolescent groups, urban local bodies as exist or may be formed in the future and any other bodies as may be considered necessary.
- Use modules developed by the Appropriate Government to conduct workshops and awareness programmes to educate Employees about the provisions of the Prevention of Sexual Harassment Laws.

#### Definitions

- "Aggrieved Persons" shall mean Employees or Visitors (other than Aggrieved Women) who are affected as victims of Sexual Harassment at any of the ToppanSpeciality Films Premises.
- "Aggrieved Woman" shall mean a woman Employee or a women Visitor who shall be affected as victims of Sexual Harassment at any of the ToppanSpeciality Films Premises.
- "Annual Report" shall mean the annual report published by the ToppanSpeciality Films in accordance with Applicable Laws.
- "Applicable Laws" shall mean all applicable laws in respect of prevention of Sexual Harassment including without limitation the Prevention of Sexual Harassment Laws, the IPC and rules there under, and applicable judicial precedents.
- "Appropriate Government" shall mean the Central Government or the State Government as applicable in relation to a Toppan Speciality Films Private Limited Office.
- "Board" shall mean the relevant board of directors of the Toppan Speciality Films Private Limited.
- "Company" means the Toppan Speciality Films Private Limited of which the Complainant is an Employee.

- “Complainant” shall mean an Aggrieved Woman or an Aggrieved Person or a person making a Complaint on behalf of an Aggrieved Woman or an Aggrieved Person.
- “Complaint” shall mean a complaint of Sexual Harassment made as per this Policy.
- “Conciliation” shall mean conciliation proceedings available to an Aggrieved Woman or an Aggrieved Person as per Applicable Laws.
- “District Area” shall mean the district for the relevant Toppan Speciality Films Private Limited Location.
- “Disciplinary Action” shall mean disciplinary action in accordance with the Service Rules.
- “Employee” means an employee on the payrolls of the Toppan Speciality Films Private Limited and shall include those regular, temporary, ad hoc or daily wages, whether employed directly, through an agent or a contractor. It includes co-workers, contract worker, probationer, trainee, apprentice on deputation, contract, temporary, part time or full time, or working as consultants or called by any other name.
- “Enquiry Proceedings” shall mean the final enquiry proceedings post issue of Findings and receipt of final representations from the Aggrieved Person and the Respondent.
- “Enquiry Report” shall mean the final enquiry report issued by the Internal Committee, listing the Recommendations to the Senior Management in respect of a Complaint.
- “False Complaint and Malicious Evidence” shall mean a false Complaint as described in this policy. The following are liable for making False Complaint or Malicious Evidence (i) an Aggrieved Woman or an Aggrieved Person, (ii) a person making a Complaint and/or (iii) any witness who has given forged or provided misleading evidence to the Internal Committee.
- Findings” shall mean the findings of the Internal Committee conducted post Preliminary Investigations.
- “HR” shall mean the human resource department of Toppan Speciality Films Private Limited called as the HR department or whatever name.
- “Incident” refers to an incident of Sexual Harassment.
- “IPC” shall mean the India Penal Code, 1860.
- “Internal Complaints Committee” or “Internal Committee” shall mean a committee set up in accordance of this Policy.
- “Investigation Process” shall mean investigation process in accordance of this Policy.
- “Legal Heir” shall mean the legal heir in accordance with the Applicable Laws.
- “Toppan Speciality Films Private Limited Offices” shall mean all offices and administrative units of Toppan Speciality Films Private Limited located at different places, or divisional or sub-divisional level and “Toppan Speciality Films Private Limited” shall mean any one of the same.
- “Toppan Speciality Films Private Limited Location” shall mean any of the Toppan Speciality Films Private Limited official premises and shall include the enterprise, establishment, society, trust, unit or service centre, hospital, nursing home, or an Off-Site Location where an Aggrieved Woman or an Aggrieved Person has been subject to Sexual Harassment.

- “Member” refers to a member of the Internal Committee appointed as per this Policy for handling the case of Sexual Harassment.
- “Off-Site Locations” shall mean an off-site place, not being a part of the Toppan Speciality Films Private Limited premises visited by an Employee or Visitor during any off-site event organised by any Toppan Speciality Films Private Limited arising out of or during the course of employment including gaming venue and transportation arranged by Toppan Speciality Films Private Limited.
- “Personal File” shall mean the personal file of an Employee as maintained by HR of the Toppan Speciality Films Private Limited.
- “Policy” shall mean this Toppan Speciality Films Private Limited Prevention of Sexual Harassment Policy.
- “Preliminary Proceedings” shall mean the preliminary enquiry proceedings conducted by the Internal Committee post receipt of a Complaint.
- “Prescribed Manner” shall mean the process and documentation as is prescribed in this Policy for submission of Complaints.
- “Prevention of Sexual Harassment Law” shall mean the Sexual Harassment Of Women At Workplace (Prevention, Prohibition And Redressal) Act, 2013, and Sexual Harassment Of Women At Workplace (Prevention, Prohibition And Redressal) Rules, 2013.
- “Recommendation” shall mean the recommendations of the Internal Committee in accordance with this Policy.
- “Remedial Action” shall mean a remedial action against the Respondent in accordance with this Policy.
- “Respondent” refers to an Employee or a Visitor committing the act of Sexual Harassment at any Toppan Speciality Films Private Limited. Location or against whom a complaint of Sexual Harassment has been lodged.
- “Senior Management” shall mean any person responsible for the management, supervision and control of the Toppan Speciality Films Private Limited or a person discharging contractual obligations with respect to the Employees, and includes the person or Board or Committee responsible for formulation and administration of policies for such Toppan Speciality Films Private Limited.
- “Service Rules” shall mean the applicable service rules of the Toppan Speciality Films Private Limited where the Respondent is working, and shall include, without limitation, all standing orders, code of conduct, policies, guidelines and/or any other communication(s) made by the Management in respect of employment or service conditions or related issues, from time to time.
- “Settlement” or ‘Conciliation Settlement’ shall mean the terms of settlement arrived at, with the assistance of the Internal Committee, between an Aggrieved Woman or an Aggrieved Person, and, a Respondent, post Conciliation as per this Policy.
- “Sexual Harassment” shall mean sexual harassment as provided of this Policy.
- “Special Educator” shall mean a person trained in communication with people with special needs in a way that addresses their individual differences and needs.
- “Statutory Report” shall mean a report to be filed by the Internal Committee in accordance with the Applicable Laws.
- “Victimization” or “Retaliation” in the context of this Policy is any adverse employment action against an Aggrieved Woman or an Aggrieved Person because

the Aggrieved Woman or Aggrieved Person had lodged a Sexual Harassment complaint or participated in the Investigation Process of a Complaint.

- “Visitor” shall mean any visitor not being an Employee on any Toppan Speciality Films Private Limited Location.

#### **General guidelines**

- Sexual harassment can occur in variety of circumstance at any Toppan Speciality Films Private Limited location, in any of the following cases:
  - The Aggrieved Person or Respondent shall be a woman or a man
  - The Respondent shall or shall not be a member of the opposite sex
  - It shall occur without economic injury to the Aggrieved Woman or the Aggrieved Person
  - The Respondent, the Aggrieved Woman or the Aggrieved Person shall be a Visitor on any of the Toppan Speciality Films Private Limited Location.
- Acts of Sexual Harassment include (but are not limited to) the following unwelcome sexually determined acts or behaviours (whether directly or by implication) that the aggrieved woman or aggrieved person considers humiliating:
  - Unwelcome physical contact with the Aggrieved Woman or the Aggrieved Person on any part of the body, or advances which affronts the dignity of the Aggrieved Woman or the Aggrieved Person; and/or
  - Demand or request for sexual favours; and/or
  - making sexually coloured remarks; and/or
  - showing pornography; and/or
  - any other unwelcome, physical, verbal or non-verbal conduct of sexual nature; and/or
  - implied or explicit promise of preferential treatment in his/her employment in relation to or connected with any act or behaviour of Sexual Harassment; and/or
  - implied or explicit threat of detrimental treatment in his/her employment in relation to or connected with any act or behaviour of Sexual Harassment; and/or
  - implied or explicit threat about her present or future employment status in relation to or connected with any act or behaviour of sexual harassment; and/or
  - direct and/ or indirect threat, coercion, suggestion that the Aggrieved Person or Aggrieved Woman being subjected to harassment would stand to suffer in terms of employment, promotion within the organisation in the event the unwelcome advances are spurned; and/or
  - interference with his/her work or creating an intimidating or offensive or hostile work environment in relation to or connected with any act or behaviour of sexual harassment; and/or
  - any action, gesture, remark, either by action and / or verbal, which has suggestive sexual overtones either directly, or by inference. Specifically included are any obscene gestures, songs, jokes, comments which affront the dignity of the Aggrieved Woman or the Aggrieved Person work environment for her; and/or
  - humiliating treatment likely to affect his/her health or safety in relation to or connected with any act or behaviour of Sexual Harassment.

#### **Internal Complaint Committee**

- Every committee shall hold office for not more than 3 years.
- DH-HR shall ensure that in case any member leaves the committee, then his replacement shall be arranged within 30 working days from last working day of existing member.

### Internal Complaint Committee Formation

By an order in writing, TSF shall formulate an internal Complaints Committee located at Toppan Speciality Films Private Limited for purpose of handling and dealing with Sexual Harassment Complaints.

- Presiding Officer and Members: The Internal Committee shall consist of the following Members:
  - The Presiding Officer, shall be a woman Employee employed at a senior level from amongst the Employees at the Toppan Speciality Films Private Limited (or, where a senior woman Employee is not available at the Toppan Speciality Films Private Limited Office, the Presiding Officer shall be nominated from any other ToppanGroup Entity Office or Department)
  - At least two (2) employees, preferably woman who are committed to the cause of women, or, who have experience in social work or who have legal knowledge
  - One (1) Member from amongst non-governmental organizations or associations dedicated to the cause of women or a person familiar with sexual harassment issues.
  - At least half of the total Members (for this purpose Member shall include the Presiding Officer) of the Internal Committee so appointed should be women; and/or
  - In the event a Complaint is received from Aggrieved Persons (not being women), the Internal Committee shall co-opt additional Members on a case-by-case basis.
  - Toppan Speciality Films Private Limited shall provide details on the constitution of the Internal Committee at such Toppan Speciality Films Private Limited Office Location in the form and manner provided in Annexure I.
- Prescribed Fees: The Member(s) appointed from amongst non-governmental organizations or associations committed to the cause of women, shall be paid fees and/ or allowances as may be prescribed by Applicable Laws.

### Existing Internal Complaints Committee

| Name of Committee  | Unit | Name of member      | Designation                               | Contact Number | e-mail IDs   |
|--|------|---------------------|---|----------------|--|
| Internal Complaints Committee constituted under Section 4 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 ( Factory & Chandigarh) | TSF  | Kirat Brar          | Head - Human Resources and Administration | 80544 - 49591  | <a href="mailto:kirat.brar@tsfilms.in">kirat.brar@tsfilms.in</a>                         |
|  |      | Sajitha S Nair      | Dy. Manager - Purchase                    | 98154 - 73931  | <a href="mailto:sajitha.nair@tsfilms.in">sajitha.nair@tsfilms.in</a>                     |
|  |      | Vaibhav J Lokare    | Head-Production (BOPP)                    | 98766- 77897   | <a href="mailto:vaibhav.lokare@tsfilms.in">vaibhav.lokare@tsfilms.in</a>                 |
|  |      | Avinash Kumar Singh | Head-International Sales (BOPP & Coating) | 85277 - 67622  | <a href="mailto:avinash.singh@tsfilms.in">avinash.singh@tsfilms.in</a>                   |
|  |      | Vishakha Babbar     | Dy. Manager - Human Resources             | 82647 - 11475  | <a href="mailto:vishakha.babbar@tsfilms.in">vishakha.babbar@tsfilms.in</a>               |
|  |      | Purna Kalra         | Consultant                                | 99889 - 97555  | <a href="mailto:purna.kalra@openhandsolutions.com">purna.kalra@openhandsolutions.com</a> |
|  | TRD  | Kirat Brar          | Head - Human Resources and Administration | 80544 - 49591  | <a href="mailto:kirat.brar@tsfilms.in">kirat.brar@tsfilms.in</a>                         |



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|  |   | Rajesh Prabhakar    | General Manager- Production               | 98760 - 02323                                    | <a href="mailto:rajesh.prabhakar@tsfilms.in">rajesh.prabhakar@tsfilms.in</a>             |  |
|  |   | Avinash Kumar Singh | Head-International Sales (BOPP & Coating) | 85277 - 67622                                    | <a href="mailto:avinash.singh@tsfilms.in">avinash.singh@tsfilms.in</a>                   |  |
|  |   | Vishakha Babbar     | Dy. Manager - Human Resources             | 82647 - 11475                                    | <a href="mailto:vishakha.babbar@tsfilms.in">vishakha.babbar@tsfilms.in</a>               |  |
|  |   | Nitin Khanna        | Head - Production (Masterbatch & TRD)     | 94279 - 52182                                    | <a href="mailto:Nitin.khanna@tsfilms.in">Nitin.khanna@tsfilms.in</a>                     |  |
|  |   | Perna Kalra         | Consultant                                | 99889 - 97555                                    | <a href="mailto:perna.kalra@openhandsolutions.com">perna.kalra@openhandsolutions.com</a> |  |
|  | <b>Internal Complaints Committee constituted under Section 4 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition &amp; Redressal) Act, 2013 Noida</b> | TSF                 | Rashi Chaturvedi                          | Head - Thermal Sales ( Domestic & International) | 98100- 32824   | <a href="mailto:rashi.chaturvedi@tsfilms.in">rashi.chaturvedi@tsfilms.in</a>             |
|  |   |                     | Kirat Brar                                | Head - Human Resources and Administration        | 80544 - 49591  | <a href="mailto:kirat.brar@tsfilms.in">kirat.brar@tsfilms.in</a>                         |
|  |   |                     | Vaibhav J Lokare                          | Head-Production (BOPP)                           | 98766- 77897   | <a href="mailto:vaibhav.lokare@tsfilms.in">vaibhav.lokare@tsfilms.in</a>                 |
|  |   |                     | Ritesh Trikha                             | Head-Purchase & Customer Services                | 98760 - 02323  | <a href="mailto:ritesh.trikha@tsfilms.in">ritesh.trikha@tsfilms.in</a>                   |
|  |   |                     | Om Prakash Joshi                          | Key Account Manager -North & east                | 95827- 77982   | <a href="mailto:om.joshi@tsfilms.in">om.joshi@tsfilms.in</a>                             |
|  |   |                     | Perna Kalra                               | Consultant                                       | 99889 - 97555  | <a href="mailto:perna.kalra@openhandsolutions.com">perna.kalra@openhandsolutions.com</a> |

#### Role of Internal Committee

- To operate as the receiving and enquiring authority for dealing and investigating all Complaints of Sexual Harassment and to recommend appropriate action for each Complaint as per this Policy and Applicable Laws.
- To provide interim relief, take immediate and appropriate corrective action by doing whatever is necessary to end or prevent any further Sexual Harassment and make the Aggrieved Woman or aggrieved Person emotionally comfortable in accordance with this Policy and in accordance with the applicable Laws (e.g., by counselling, providing necessary support services and so on).
- To submit a detailed report and recommend appropriate remedial action in respect of all Complaints, undertake appropriate analysis and apprise the senior management of the same on a periodic / need basis.
- Make follow-up inquiries to ensure the Harassment has not resumed or the Aggrieved Person is not being Victimized.
- To facilitate Conciliation for settlement in accordance with Applicable Laws.
- To ensure complete Confidentiality of all Complaints, Enquiry Proceeding in accordance with this policy.



- To take a decision after the Investigations and Enquiry Proceedings against complaints of Retaliatory behaviour against or Victimization of those involved/ associated with the Complaint or Investigation.
- To organise, deploy and disseminate orientation and training programmes or any other collateral such as notifications, for preventing and creating awareness regarding the issue of Sexual Harassment.
- Submission of Statutory Report and compliance with information requirements in the Annual Report.

#### **Process of making Complaints**

- **Complaints to be made** by any aggrieved Woman or aggrieved Person or an Employee or Visitor or a member shall make Complaints to the Internal Committee either for himself/herself or on behalf of another Employee/Visitor:
  - Verbally
  - Over the phone; or
  - In person
  - In written form - through a letter/ e-mail.
- **In Writing** - All Complaints shall need to be made/ recorded in writing in the Prescribed Manner by the Complainant covering all the relevant information in writing in order to commence Enquiry Proceedings. For guidance purposes, please refer to the form provided in Annexure II. For Prescribed Manner for submission of Complaints, please refer to Annexure III. If the Complainant or the Aggrieved Woman or the Aggrieved Person is unable to make the Complaint in writing, the Internal Committee shall render all reasonable assistance to such person to register the Complaint in writing, upon receiving a verbal Complaint.
- **Incapacitated Aggrieved Woman** - If an Aggrieved Woman is unable to make a Complaint on account of physical or mental incapacity or her death or otherwise, her legal heir or such other person (as is prescribed to do so by the Appropriate Government), shall make a Complaint on her behalf. Please see Annexure IV in this regard.
- **Time Limit** - All Complaints should be made within three (3) months from the date of the Incident. In case of a series of Incidents, Complaints should be made within three (3) months from the date of the last Incident. The Internal Committee shall only extend the time limit as per Applicable Law, if satisfied that the circumstances were such that delay was warranted and record reasons for condoning the delay.

#### **Procedure of Dealing with Complaints**

- **Settlement by Conciliation for Aggrieved Women or Aggrieved Person:** After making a Complaint, and, before the commencement of Preliminary Proceedings, an Aggrieved Woman or an Aggrieved Person shall, at their sole discretion, request for Conciliation and settlement. Such Conciliation shall be in accordance of this Policy
- **Preliminary Proceedings:** If no request for Conciliation is made by the Aggrieved Woman or the Aggrieved Person, the following shall take place on receipt of a written Complaint:
  - The Internal Committee shall contact the Aggrieved Woman or the Aggrieved Person at the earliest, no later than three (3) working days from the date of receipt of a Complaint made in the Prescribed Manner. The Internal Committee shall also contact the Respondent to obtain the Respondent's version.

- Within five (05) working days of receipt of the Complaint, the Internal Committee shall organize a Preliminary Meeting with the Aggrieved Woman or the Aggrieved Person to hear and record her/his allegations.
- As soon as a Complaint is received, and no later than within seven (07) working days from the date of receipt of the written Complaint, the Internal Committee shall send one (01) copy of the Complaint to the Respondent.
- The Respondent shall be required to file his/her written reply to the Complaint along with his/her list of documents and names and addresses of witnesses, if any, within a period not exceeding ten (10) working days from the date of receipt of the Complaint by the Respondent in the Prescribed Manner.
- Immediately thereafter, within three (03) working days, the Respondent shall be asked to present his/her case before the Committee and an opportunity shall be given to the Respondent to provide explanation.
- The Aggrieved Woman or the Aggrieved Person or the Respondent may also submit any further corroborative material with documentary proof, oral or written material, etc., to substantiate a Complaint at any stage before the Final Proceedings.
- The Internal Committee may hold the Preliminary Proceedings at any Toppan Speciality Films Private Limited Location or elsewhere as it deems appropriate.
- **Final Proceedings**
  - **Final Investigation and Final Enquiry** - Upon completing the Preliminary Proceedings, referred above, the Internal Committee shall proceed to conduct a Final Investigation and Final Enquiry into the Complaint as stated in this policy. The Final Enquiry Proceedings shall be completed within four (4) weeks from the complaint received.
  - **Powers of Committee for Conduct of Final Investigations** -For conducting Final investigations, the internal committee shall be entitled to exercise any of the below referred powers, which shall be the same powers as are vested in a civil court when trying a suit in respect of the following matters:
    - summoning and enforcing attendance of any person and examining him on oath
    - requiring document recovery and production; and
    - any other powers that may be exercised as informed from time to time.
  - **Final Findings** -After conducting a final Investigation and final enquiry, the Internal Committee shall record their final Findings in writing in accordance with the letter and spirit of applicable Laws.
  - **Final Enquiry Proceedings** - a copy of the final findings shall be made available to the aggrieved woman or the aggrieved person and the respondent and an adequate opportunity shall be given to each of them to enable them to make representation against the final findings before the internal committee. The representations of the aggrieved woman or the aggrieved person and the respondent shall be duly recorded in writing.
  - **Enquiry Report and Recommendations** - The Internal Committee shall submit its Enquiry Report along with its Recommendation to the Senior Management, no later than ten (10) days after the completion of the Final Investigations and Final Enquiry Proceedings, A copy of the Enquiry Report shall be made available to the concerned parties. It is clarified that the Internal Committee shall not provide soft copies of any Final Finding or any part of the Enquiry Proceedings to anyone.

- The Internal Committee shall record all material facts and evidence gathered during the enquiry proceedings and reasons for reaching its conclusions and provide any of the following Recommendations in its Enquiry Report:
  - **No Case is Made Out** - In the event the Internal Committee determines and Recommends in its Enquiry Report that the allegation against the Respondent has not been proved and/or the Complaint does not fall under the purview of Sexual Harassment, it shall recommend that no action is required to be taken in the relevant Complaint.
  - **False Complaint** - If the Internal Committee determines in its Enquiry Report that allegations in a Complaint against a Respondent are false and malicious or forged or misleading evidence has been produced by any witness or any Complainant, the Internal Committee shall recommend necessary actions to be taken in accordance with remedial action as per enquiry report of this Policy. It is clarified that the inability to substantiate is not a false Complaint.
  - **Case is Made Out** - In the event the Internal Committee determines that a Case is made out, it shall recommend to the employer the remedial action, as per enquiry report of this Policy

#### **Determination Process of complaint and/or enquiry proceedings**

##### **Conciliation and settlement for aggrieved women only**

- If the aggrieved Woman or the aggrieved person requests for Conciliation, in writing, before the commencement of enquiry proceedings, the Internal Committee shall facilitate and take steps to settle the matter between her and the respondent through conciliation. However, no monetary settlement shall be made as a basis for such conciliation.
- The terms of conciliation settlement shall be recorded by the Internal Committee and forwarded to the Senior Management to take action as per the Recommendation of the Internal Committee. Copies of such Settlement shall be provided to the Aggrieved Woman or the aggrieved Person and the Respondent.
- Where a conciliation settlement is arrived at, no further Enquiry shall be conducted by the Internal Committee. However, if the aggrieved Woman informs the Internal Committee that the Respondent has not complied with any of the Settlement terms as per the Conciliation Settlement, the Internal Committee shall either proceed to make Enquiry into the Complaint or, any of the forward the Complaint to the Police.

##### **Remedial Action as per the enquiry Report**

The Senior Management shall act upon the Recommendation within fifteen (15) days of receipt of the Enquiry Report and the Recommendation(s), as follows:

- **If no case is made out** - the Complaint shall be dropped after recording the reasons thereof.
- **If a False Complaint or Malicious Evidence is filed** - the Senior Management shall take action against the Complainant or person who has made the Complaint in accordance with the Service Rules of the Toppan Speciality Films Private Limited. The Senior Management shall also issue to the parties found guilty of lodging a False Complaint or Malicious Evidence a warning, reprimand or censure, withholding of promotion, withholding of pay rise in increments, terminating the Respondent from service or undergoing counselling session or carrying out community service.
- **If a Case is Made Out (for Aggrieved Woman Only), the Internal Committee may suggest the following-**
  - Initiate Enquiry for Misconduct in accordance with the Service Rules; and/or

- Deduct from the salary of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Woman and pay compensation in accordance with this policy; and/or
  - Require the respondent to write an apology; and/or
  - Issue to the Respondent a warning, reprimand or censure, withholding of promotion, withholding of pay rise in increments, terminating the Respondent from service or undergoing counselling session for carrying out community service.
- **If a Case is Made Out (for Other Aggrieved Persons), the Internal Committee may suggest the following for-**
    - Initiate Enquiry for Misconduct in accordance with the Service Rules; and/or
    - Issue an advisory to be filed in the Personal File; and/or
    - Issue a warning letter to be filed in the Personal File; and/or
    - Stoppage of increment for a specified time period, and/or
    - Issue to the Respondent a warning, reprimand or censure, withholding of promotion, withholding of pay rise in increments, terminating the respondent from service or undergoing counselling session or carrying out community service.

- **Misconduct** - All cases where action of misconduct is required to be taken shall be dealt with as per the Service Rules and may involve the following actions:
  - Reduction to a lower grade or post; and/or
  - Suspension from services without salary/fees for a specified time period; and/or
  - An Employee dismissed and discharged from service for such misconduct, shall not be entitled to any notice or pay in lieu of notice, or any other benefits or privileges provided by the Management except those to which he may be entitled under Applicable Law; and/or
  - Any other action that the Senior Management may deem commensurate having regard to the severity of Sexual Harassment.

All matters pertaining to suspension or termination of services shall require approval from the senior most official in the HR Department or the Managing Director of the Toppan Speciality Films Private Limited

- **Compensation** - The Internal Committee may award compensation to the aggrieved woman in pursuance of this Policy upon having due regard to the following:
  - Mental trauma, pain, suffering and emotional distress caused to the Aggrieved Woman; and/or
  - Loss of career opportunity as a result of sexual harassment incident; and/or
  - Medical expenses for physical or psychiatric treatment; and/or
  - Income and financial status of the Respondent; and/or
  - Feasibility of payment in lump sum or in instalments; and/or

If the Employer is unable to deduct from the salary of the Respondent on account of his being absent, or cessation of employment, it may direct the Respondent to pay the compensation amount directly to the aggrieved Woman; and/or If the Respondent fails to pay the amount, the Internal Committee may recommend for required legal action against the respondent for appropriate recovery.

#### **Non-Retaliation Policy**

- **Non-Retaliation** - The Internal Committee/ Senior Management must be sensitive to the possibility of the Respondent displaying Retaliation behaviour. At all times, the Internal Committee/ Senior Management shall take all necessary steps to prevent Retaliation/ Victimization against the Aggrieved Person/Complainant.

- **Privilege to Aggrieved Woman during enquiry proceedings** - If the Aggrieved Woman requests it in writing, the Internal Committee may recommend the Senior Management to do any of the following, during a pending Enquiry Proceeding:
  - Transfer the aggrieved Woman or the Respondent to any other Toppan Location
  - Grant leave to the aggrieved Woman for up to three (3) months. This leave shall be in addition to the leave she is otherwise entitled to; or
  - Grant such other remedy as shall be prescribed by the appropriate Government from time to time in this regard
  - Restrain the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report, and assign the same to any other employee as the senior management may deem fit and necessary.

#### **Appeals against recommendation of a committee**

- **Recourse to Court** - Appeals against recommendations of the Internal Committee may be made to a Court or tribunal as per the Service Rules applicable to the person making the appeal. Rules are to be prescribed by the appropriate authority for manner of making appeals where no service rules exist.
- It is clarified that when the Respondent is convicted of the offence, the court may order the respondent to pay to the aggrieved woman such sums as it may consider appropriate as per of this policy and applicable laws.

#### **Local committee**

- As per applicable laws, aggrieved women may make complaints against employers or in cases where an internal committee has not been set up in writing to the “local complaints committee” (“local committee”) constituted at a district area. the proceeding for dealing with complaints and enquiry proceedings shall be as per applicable laws.

#### **Confidentiality during enquiry**

- **Confidentiality Obligations** - Toppan Speciality Films Private Limited is committed to maintaining confidentiality of the Complaint, and undertakes that, except to the extent required to give effect to the implementation of this Policy, the identity and address of the Aggrieved Women or Aggrieved Person, Respondent, Witnesses, information relating to conciliation and enquiry proceedings, recommendation of the internal committee and action taken by any Toppan Speciality Films Private Limited shall not be communicated, published or made know to the public, press and media in any manner.
- **Permitted Disclosure** - Only information regarding justice secured to any the aggrieved women or aggrieved person without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved women or the aggrieved person or the witnesses may be shared.
- **Breach of Confidentiality Obligation or Permitted disclosure** - Violation of obligation to adhere to the confidentiality obligation or permitted disclosure, listed above can result in Disciplinary action against the concerned committee member and/or may result in dismissal or appropriate action against the member as per applicable laws

#### **Reporting Obligations**

- **Statutory Report** - The Internal Committee of Toppan Speciality Films Private Limited shall prepare and submit the Statutory Report to the CEO and district officer during each Calendar Year. The Statutory Report shall provide the following information:
  - Number of Complaints on Sexual Harassment received during the year



- Number of Complaints disposed off during the year
- Number of cases pending for more than ninety days
- Number of workshops or awareness programmes against sexual harassment carried out and
- Nature of action taken by Toppan Speciality Films Private Limited.

- **Annual Report** - Toppan Speciality Films Private Limited shall include in its Annual Report the number of cases filed, if any, and their disposal under the Applicable Laws.

**Police Complaints**

- Complainant may lodge a Complaint with the relevant police station in the following circumstances
  - In case of complaints where such conduct amounts to a specific offence under the Indian penal code or under any other law currently having the force of law.
  - Where the aggrieved woman informs the Internal Committee that the settlement terms have not been met with by the respondent, the internal committee shall either proceed to make enquiry or forward the complaint to the police as per the applicable law.
  - If an Internal Committee has not been set up by an organisation

Where the Employee of the Company lodges a direct complaint alleging Sexual Harassment directly with the police, intimation regarding the same shall also be sent to the Internal Committee by the Employee as soon as possible.

Note: It is clarified that if an Internal Committee has not been set up, in addition to make a Complaint to the Police, the Aggrieved Woman may also make a Complaint to the Local Committee in accordance with this Policy.

**Approval**

| Management Champion<br>(Kirat Brar) |      | Chief Financial Officer (CFO)<br>(Amit Jain) |      | Chief Executive Officer (CEO)<br>(K. Manohar) |      |
|-------------------------------------|------|--|------|---|------|
| Signature                           | Date | Signature                                    | Date | Signature                                     | Date |
|                                     |      |  |      |   |      |

## ANNEXURE I

(As per the prevention of sexual harassment law, an internal committee has to be constituted at all times as follows. Further these details have to be published in every office please constitute the same accordingly)

### Internal Complaints Committee-

**1. Presiding Officer Name:**

Designation:

Contact Details:

**2. Members:**

- Member 1:

Name:

Designation:

Contact Details;

- Member 2:

Name:

Designation:

Contact Details:

- Member 3:

Name:

Designation:

Contact Details:



## Annexure – II

### Incident Reporting Format

**(The Format below are indicative guidelines for filing Complaints and not mandatory. A Complainant may make a Complaint in any other Form)**

| Incident Reporting Format  |  |
|--|--|
| Name of the Complainant/ Victim  |  |
| Incident Reported against (Name of the Respondent):  |  |
| Date of Reporting  |  |
| Incident Details   |  |
| What happened?   |  |
| Who was involved?  |  |
| When did the incident take place?  |  |
| Where did the incident take place?   |  |
| How did you get to know this?  |  |
| Was it the first time this has occurred or has it happened previously?                       |  |
| Any witnesses?   |  |
| If yes, please share their names?  |  |
| Is there any other physical evidence or documents of the incident?                           |  |
| If yes, please attach the document or evidence Anything else that you would want to mention? |  |

**(Signature of the Complainant/ Victim)**

## Annexure – III

### Additional Requirements

1. Submission of Complaint copies: At the time of filing the Complaint, the Complainant shall submit to the Complaints Committee six (6) copies of the Complaint, along with supporting documents and the names and addresses of Witnesses, if any.
2. Legal Practitioner: Neither the Complainant nor the Respondent shall be allowed to bring any Legal Practitioner to represent them in their case at any stage of the proceedings before the Internal Committee.
3. All Enquiry Proceedings shall be made in accordance with the principles of natural justice.
4. Ex Parte Orders: If the Complainant or the Respondent fails to present himself or herself for three (3) consecutive hearings convened by the Presiding Officer, the Internal Committee shall provide a written notice of at least fifteen days to the Complainant and the Respondent, and may either terminate the Enquiry Proceedings or may pass an Ex Parte decision on the Complaint.
5. All Inquiries shall be conducted by and in the presence of a minimum of three (3) Members, including the Presiding Officer.
6. It is clarified that the Internal Committee shall only distribute and circulate hard copies of all documents required to be distributed to any party. No soft copies shall be provided.

## ANNEXURE IV

### Manner of Making Complaints by Incapacitated Women

1. **Physical Incapacity:** Where the Aggrieved Woman is unable to make a Complaint on account of her physical incapacity, a Complaint may be filed by any of the following persons:
  - Her relative or friend; or
  - Her co-worker; or
  - Any officer of the National Commission for Women or State Women's Commission;
  - Any person who has knowledge of the Incident, with the written consent of the Aggrieved Woman.
2. **Mental Incapacity:** Where the Aggrieved Woman is unable to make a Complaint on account of her mental incapacity, a Complaint may be filed by any of the following persons:
  - Her relative or friend; or
  - Special Educator; or
  - Qualified psychiatrist or psychologist; or d. the guardian or authority under whose care she is receiving treatment or care; or
  - Any person who has knowledge of the Incident jointly with her relative or friend or a Special Educator or qualified psychiatrist or psychologist guardian or authority under whose care she is receiving treatment or care.
3. **Other Incapacity:** Where the Aggrieved Woman is unable to make a Complaint for any reason other than Section I or Section II of this Annexure III, a Complaint may be filed by any person who has knowledge of the Incident, with the written consent of the Aggrieved Woman.
4. **Death of Aggrieved Person or Aggrieved Woman:** Where the Aggrieved Woman is deceased, a Complaint may be filed by any person who has knowledge of the Incident, with the written consent of her Legal Heir.