



# Lucid Colloids Limited

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**Registered & Corporate Office:**

401A Navbharat Estates, Zakaria Bunder Road, Sewri West, Mumbai 400015, India.

Tel: +91-22-24158059 Fax: +91-22-24158074 Email: admin@lucidgroup.com

Company Identification Number: U24311MH1996PLC099800

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## **POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES IN LUCID COLLOIDS LIMITED:**

### **INTRODUCTION:**

Lucid Colloids Limited is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

### **APPLICABILITY:**

This Policy extends to all employees of the Company and its Subsidiaries in India and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

The term employee refers to a person employed at a workplace for any work on regular, temporary ad hoc 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, contract worker, probationer, trainee, apprentice or called by any other such name.

### **WHAT IS SEXUAL HARASSMENT?**

Sexual Harassment would mean and includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- i. Physical Contact and advances; or
- ii. A demand or request for sexual favours; or
- iii. Making sexual coloured remarks; or
- iv. Showing pornography; or
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

#### **“Unwelcome sexually determined behaviour” includes but is not limited to:**

- a. Subjecting another person to an unwelcome act of physical intimacy including grabbing, touching, including sexual flirtations, advances or propositions.
  - b. Making an unwelcome demand or request whether directly or by implication for sexual favours and/or making it a condition of employment / payment of wages / increments/promotion and so on.
  - c. Making any unwelcome remark with sexual connotations like sexually explicit, remarks, cracking jokes or using sentences with sexual connotations or making sexist remarks etc.
  - d. Showing any sexually explicit visual material in the form of pictures / cartoons / pin-ups / calendars / screen-savers on computers / any offensive written or electronic material / including pornographic.
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- e. Engaging in any other unwelcome conduct of a sexual nature, verbal or even nonverbal, staring to make the other person uncomfortable, making offensive gestures, kissing sounds etc.
- f. Sending unwelcome communication of a sexual nature, through e-mail, letter, mobile technology or any other form of written or electronic communication, exhibiting conduct of a sexual nature.
- g. Where a Supervisor requests sexual favours from a junior (or any other person) in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment or threatens to terminate any such person for non-co-operation.
- h. Where a boss or other senior person inquiries into the private life of employees or persistently ask them out.
- i. Where any employee(s) make(s) sexual epithets, jokes, written or oral references to sexual conduct, and/or gossip regarding one's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable.
- j. Behavior which creates an environment that is intimidating, hostile, or offensive for members of one sex, and thus interferes with a person's ability to work.

Further, 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:

- i. Implied or explicit promise or preference treatment in your employment; or
- ii. Implied or explicit threat of detrimental treatment in your employment; or
- iii. Implied or explicit threat about your present or future employment status; or
- iv. Interference with you work or creating an intimidating or offensive or hostile work environment for you; or
- v. Humiliating treatment likely to affect your health or safety.

### **IF YOU ARE BEING HARASSED:**

- (a) Tell the accused that his behaviour is unwelcome and ask him to stop.
- (b) Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- (c) File a complaint as soon as possible. If, after asking the accused to stop his behaviour, the harassment continues, report the abuse to the Complaints Committee formed for this purpose.

### **INTERNAL COMPLAINTS COMMITTEE:**

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. Any person who is aggrieved of any act of sexual harassment can send in their complaints to the Internal Complaints Committee. The Chairperson and Members of the Committee are as follows:

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No.	Name	Designation	E-mail Id
1	Ms. Nandita Ramos	Chairperson	<a href="mailto:nramos@lucidgroup.com">nramos@lucidgroup.com</a>
2	Ms. Sandra Soans	Member	<a href="mailto:ssoans@lucidgroup.com">ssoans@lucidgroup.com</a>
3	Ms. Modita Vyas	Member	<a href="mailto:glkumawat@lucidgroup.com">glkumawat@lucidgroup.com</a>
4	Mr. Kunal U. Merchant	Member	<a href="mailto:kmerchant@lucidgroup.com">kmerchant@lucidgroup.com</a>
5	Mr. Yogesh Vaza	Member	<a href="mailto:yvaza@lucidgroup.com">yvaza@lucidgroup.com</a>

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

## **REDRESSAL PROCESS:**

Any aggrieved employee shall make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee within a period of three months from the date of the incident and in case of a series of incidents, within a period of three months from the date of the last incident.

The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential.

Complaints made under this Policy will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law.

There will be no retaliation against an employee who, in good faith, files a complaint or participates in any way in the investigation of a complaint.

If, at the conclusion of its investigation, the Internal Complaints Committee determines that a violation of policy has occurred, the Company will take effective remedial action commensurate with the severity of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of policy.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.