

NUTRIVITA		PR-7-28-B
Policy On Prevention of Sexual Harassment of Women at the Workplace		
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Prepared By: Arati Kulkarni Date: Position: QM Signature:	Checked By: Panchaxari Pandhare Date: Position: GMQ Signature:	Approved By: Shailesh Purohit Date: Position: CEO Signature:

1. Applicability:

To all employees employed by the company either in India or outside the country. NutriVita Foods Private Limited (hereinafter referred to as the company) believe in equal employment opportunity for all its employees in furtherance of which the company is anchoring this policy against sexual harassment.

While adopting a zero-tolerance attitude against any kind of violence or gender discrimination caused or perpetrated during the tenure with and in course of employment with the company towards female employees of the company, either in India or outside the country, the company seeks to create and maintain safe work environment, free of sexual harassment of women, hostility, retaliation and discrimination.

- I. Employees of the company include persons hired as permanent, temporary or on retainership basis, Part time basis directly by the company.
- II. Offices of the company include all the offices of the company in India and outside India

2. Definition:

Sexual harassment of female employee consists of any unwelcome, sexually determined behaviour whether directly ,overtly or by implication, by any male in charge of the Management or a male/ female co-employee either individually or in association with other person using his/her authority to exploit the sexuality or sexual identity of a subordinate employee or a co-worker to harass in a manner which prevents or impairs her full utilization of employment benefits, facilities or opportunities or any other behaviour which is generally considered to be derogatory.

Explanation:

Sexual harassment shall include but not be limited to;

A. Physical-Harassment:

Such as physical contact and advances, suggestive sexual indecent, physical conduct, isolating, cornering, trapping or blocking pathway, stalking, lured, steers, excessively lengthy handshakes, fondling, intentional touching, pinching, grabbing, brushing against body, exhibition of pornography or objects, exposure of organs molestation, assault, rape.

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B. Verbal and Gesture Harassment:

Such as demand or request for sexual favours, suggestive or sexually coloured remarks /comments/jokes/display of sound obscene or repeated phone calls, humiliating and/or abusive and /or derogatory speech, sexual harassment prepositions/innuendoes/slurs/threats, forms of address like honey/darling/sweetheart, babe.

C. Written or Graphic Harassment:

Such as showing of any visual material of a sexual nature, displaying or exhibiting pornography or any other sexual object/material, obscene or sexually coloured e-mails/letters/notes/memos, etc.

D. Emotional or Psychological Harassment:

Such as any Act of sexual harassment nature that has the purpose or effect of Interfering with and adversely affecting an employee's concentration, work performance, productivity, presence, availability, any other employment opportunities, and/or Creation of unhealthy, unsafe, intimidating, coercive, humiliating and hostile work environment.

E. Tenure of employment with the Company:

Means the entire period from when an employee joins the company anywhere in the globe, and will continue till the employee's date of relieving. No person who has been already relieved from the services of the company shall be deemed to be an employee merely because the clearance formalities or full and final settlement has not completed.

3. Scope of Policy against Sexual Harassment:

This Policy shall be applicable to all complaints of Sexual harassment made-

- I. by an employee of the company against an employee of the company working within or outside of India,
- II. by an employee of the customer or client company of the company against an employee of the company working within or outside of India
- III. by an employee of the company against an outsider, visitor, professional or consultant who may have caused sexual harassment to her during the course of her employment and within the premises of office, in India or outside the country, of the company.
- IV. By any female against a male/female employee of the company working within or outside of India only if the act of sexual harassment occurred during

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the course of her employment and within the premises of office, in India or outside the country, of the company.

4. Awareness:

Committee members shall arrange to conduct classes/awareness sessions periodically at regular intervals, to ensure all are aware of the policy and relevant details.

5. Grievance Mechanism:

Procedure for registering complaints-

- I. A complaint, and on-going/continued acts of sexual harassment in furtherance to the original complaint, shall be submitted in writing to the head or any member of the scrutiny committee mentioned hereinafter within three months from the date of occurrence of an act of sexual harassment delay in written submission due to confinement, travelling or any exceptional contingency be condoned.
- II. A complaint shall include the details of occurrence of an act of sexual harassment such as name and designation of the accused, other concerned employee(s) date, time, venue, witnesses, description of act etc.
- III. No specific format of complaint is required to be submitted.

Enquiry Procedure-

Each complaint of sexual harassment shall be dealt with utmost confidentiality and urgency by a Scrutiny Committee consisting of: -

*Chairperson **Mr. Shailesh Purohit , CEO**

*Member Ms. Panchaxari Pandhare, GMQ

*Member Ms. Shweta Salunkhe

*Member Ms. Aarti Kulkarni

- I. Chairperson **Mr. Shailesh Purohit (CEO)** shall be designated person of authority responsible for all communications in this regard.
- II. Within three working days from the receipt of a complaint, the Scrutiny Committee shall commence an official enquiry-
 - by informing by the said complaint to the accused and /or the company client or customer company as the case may be;
 - by instructing him to stop the alleged act or any other act defined to be sexual harassment, and
 - by asking for an immediate explanation from him.

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- III. Within five working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing her about the initial steps taken by the company in order to stop the alleged act(s).
- IV. within 15 days from the receipt of the original complaint, the scrutiny committee shall record and accordingly communicate in writing to the complainant.
- V. Unless for some compelling reasons, a complaint shall be finally disposed of no later than one month from receipt of the original complaint by recording the decision of the scrutiny committee, accordingly informing the complainant and accused of the same.
- VI. All employees of the company are duty bound to assist in the investigative steps and required employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.

6.

A. Redressal

- I. Within 24 hours of the closing of the case file the scrutiny and committee shall present the same to and inform its decision to the Chief Operating Officer.
- II. In case of a decision establishing an offence of Sexual Harassment of the Complainant, within three working days, the Chief Operating Officer shall take a disciplinary action against the offender considering the nature and extent of injury caused to the Complainant, the impact of the offence on the Company profile as a whole, the position of the harasser, prior complaints or repetition of offence, etc.
- III. The disciplinary action that shall be commensurate with the nature and gravity of the offence, shall include but not limited to, warning, written apology, bond of good behaviour, adverse suspension, dismissal or any other relevant reprimand.
- IV. In case of a decision establishing an offence of Sexual Harassment of the Compliant against an accused as specified in clause 3 (a)(iii) herein the Chief Operating Officer shall immediately initiate an action by making a complaint with the appropriate Authority at the Client or Customer Company
- V. An amicable resolution of the Complaint is possible only with the written consent of the Complainant.

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B. Appeal

- I. Within two working days from receipt of the prima facie findings or the charges, if the complainant or accused is dissatisfied with the decision of the Scrutiny Committee, She /He may appeal specifying the reasons in writing to Chief Operating Officer within five working days from its receipt. The appeal shall be finally disposed of by written communication to the said party. The decision of The Chief Operating Shall be final and binding.
- II. The Chief Operating Officer's decision of the disciplinary action shall be final and cannot be appealed further.
 Person aggrieved from recommendations of the Committee or non-implementation of its recommendations may prefer the appeal to the appropriate legal Authority.

C. Facilities

Facility for medical, legal, counselling or any other support service regarding Sexual Harassment may be made available by the Company to all its employees. Employees seeking such a facility shall approach the designated counsellor.

7. Term of Office

Every member nominated and appointed shall hold office till three years under Sexual Harassment Act 2013 from the date of appointment. If the member does not attend three consecutive meetings of the Committee, He/she shall cease to be such member and the decision of the Committee, on question either He/she has ceased to be such member or not, shall be final. Any vacancy arising thereof shall be filled as early as possible by the Company and the person so nominated shall continue to be a member for the duration of term of office as that of the member in whose place, He/ She is nominated.

8. Report

Annual report summarising complaints and redressal of sexual harassment shall be prepared by the company. The said report as well as all documents in the custody the policy against Sexual Harassment shall be updated from time to time and made accessible to all employees.

In the event there is any conflict between the policy and legal enactment, then the legal enactment shall prevail.