



AVEER FOODS LIMITED

PREVENTION OF SEXUAL HARASSMENT POLICY AT WORKPLACE [POSH]



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POLICY VERSIONS		
SR. NO.	DESCRIPTION	DATE OF APPROVAL
1.	Adoption of Policy	1 st September 2021
2.	1 st Revision	9 th February 2024
3.	2 nd Revision	13 th August 2024
4.	3 rd Revision	27 th May 2025



PREVENTION OF SEXUAL HARASSMENT POLICY AT WORKPLACE [POSH]

AT AVEER FOODS LIMITED

1. **PREAMBLE:**

Aveer Foods Limited (“AFL”) is committed to creating a safe work environment that is free from any form of sexual harassment and where all employees are treated with dignity and respect. The Company is dedicated to maintaining an environment that is free from coercion and intimidation.

Aveer Foods Limited shall adopt certain procedures and guidelines to govern cases against sexual harassment. This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder (hereinafter called “the Act”)

This Policy extends to all employees, and other stakeholders of Aveer Foods Limited and comes into effect immediately.

The earlier policy executed on 1st September 2021 has been modified with this policy.

2. **DEFINITIONS:**

a) **Employees:** a person employed at the workplace for any work on regular, temporary, adhoc or daily wage basis either directly or through an agent, including a contractor with or without the knowledge of the principle employer whether for remuneration or not or working on 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 by any other such name and also includes persons carrying out any work on behalf of the Company and may have been hired as permanent, Temporary, Contracted, or on a retainership basis, Part Time Basis, etc. either directly or indirectly or through vendor organization.

b) **Workplace/Location:**

It includes all the Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company. In addition to the place of work[Head office and Factories] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work



during the course of and/ or arising out of employment/ contract/engagement with the Company including transportation provided for undertaking such a journey. As on date, the Company is having 3 locations as follows:

Registered & Corporate Office: Plot No. 55/ A/ 5 6 Hadapsar Industrial Estate, near Tata Honeywell, Hadapsar, Pune- 411013.

Factory 1: Plot no, 399 & 400, Village Sanghvi, Taluka Khandala, District Satara- 412801.

Factory 2: 545/546 Belur Industrial Area, village Mummigatti, Dharwad- 580011.

- c) **Sexual Harassment:** Any behavior (physical, verbal, written, graphic, electronic, emotional, psychological, or through gestures that offend) that has been defined as inappropriate by the Policy, whether intentional or not, which offends the dignity of the person towards whom the behavior is directed by fellow employee(s), supervisor(s), customer(s) or supplier(s) will be considered as sexual harassment and shall invite serious disciplinary action.

Sexual harassment would mean and include (whether direct or by implication) any of the following:

- 1) unwelcome sexual advances, requests, or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination, or evaluation of a person towards any activity;
- 2) advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, indecent exposure, physical contact, sounds, display of pictures, intrusive questions about a person's private life or body, signs, insults or taunts based on sex, obscene communication, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- 3) eve teasing, innuendos, and taunts, unwelcome invitations to go out, suggestive comments or jokes, physical confinement against one's will and likely to intrude upon one's privacy;
- 4) act or conduct by a person in authority which creates an environment at the workplace hostile or intimidating to a person belonging to the other sex;



- 5) conduct of such an act at the workplace or outside in relation to an employee of the Company, or vice versa during the course of employment;
- 6) any unwelcome gesture by an employee having sexual overtones;
- 7) physical contact and advances
- 8) demand or request for sexual favors
- 9) Staring, leering or unwelcome touching;
- 10) Suggestive comments or jokes;
- 11) sexually colored remarks;
- 12) showing pornography
- 13) any unwelcome sexual activity tied to employment decision or benefits and
- 14) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
- 15) Any other same or similar behavior or acts as above while working online from anywhere.

The following circumstances if it occur or is present in relation to any sexually determined act or behavior amount to sexual harassment:

- 1) Implied or explicit promise of preferential treatment in employment.
 - 2) Implied or explicit threat of detrimental treatment in employment.
 - 3) Implied or explicit threat about the present or future employment status;
 - 4) Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
 - 5) Humiliating treatment is likely to affect health or safety.
- d) **Aggrieved Woman:** In relation to workplace means, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent includes contractual, temporary employees and visitors.
- e) **Complainant:** Any aggrieved person who makes a complaint alleging sexual harassment under this policy.
- f) **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved person under this policy.

3. **APPLICABILITY:**

- 1) All employees of Aveer Foods Limited (including employees on contract, on 3rd Party rolls)



- 2) All customers, suppliers and Contractors of the Company.
- 3) All third parties associated with the Company at work or involved in work-related activities.
- 4) The Complainant as well as the respondent may be a man or woman.
- 5) The respondent can be anyone including the complainant's supervisor/ an agent/ contractor/customer/client/ 3rd (third)Party associated with the Company/ or any other employee of Aveer Foods Limited.
- 6) The complainant does not have to be the person harassed but could be anyone affected by the offensive conduct.
- 7) It may occur without economic injury to the Complainant.
- 8) It may occur at workplace or any other place where the employee is engaged in work related activities.
- 9) It may occur with the employees deputed to client sites.

4. **MECHANISM:**

- 1) **HOW TO ADDRESS HARASSMENT:** If you are being harassed whether by colleagues, customers, or vendors you can choose to talk to:

Your Head: If Customers, stakeholders or team members are involved in your claim you may reach out to your reporting head. Your reporting head will assess your situation and may contact HR if appropriate.

HR Department: Feel free to reach out to HR in any case of harassment no matter how minor it may seem. For your safety, contact HR as soon as possible in cases of serious harassment (e.g. sexual advances) or if your reporting head is involved in your claim. Anything you disclose will remain confidential.

- 2) **CONSTITUTION OF COMPLAINTS COMMITTEE:**

A committee has been formed under this policy to investigate Complaints of sexual harassment referred to it and make appropriate recommendations to the Management team.

The Internal Complaints Committee shall be formed as mandated by the law. [hereinafter called as ICC] Annexure 1 of the Policy provides for constituent members of the ICC. The



committee members shall reside at the registered office of the Company. Location-wise other representatives co-opted with the Internal Complaints Committee.

The ICC should comprise a presiding officer (compulsorily woman), and not less than half of its members should be women.

External member as mandated by law.

3) **REDRESSAL PROCEDURE AND MECHANISM:**

An aggrieved person may make in writing a complaint of sexual harassment at the workplace to any of the committee members within the period of 3 months from the date of the alleged incident. The Committee will investigate the complaint within 90 days from receipt of such complaint and for which the Committee will meet as soon as practicable upon receipt of the complaint. The Committee will have the power to call any person and record their statements and make such investigation as may be necessary to decide the truth and falsity of the complaint.

In the event of the Committee coming to a prima facie conclusion that the complaint is true, it will advise the Head HR on initiating disciplinary action. It will be for the Head of HR to initiate disciplinary action, conduct an inquiry, and impose necessary punishment, including termination of service, depending on the gravity of the misconduct.

The aggrieved person is free to directly complain to the HR department and the committee as above.

Having set out the policy, it needs to be emphasized that it should be the endeavor of all to ensure that a situation is not created where an employee is required to make a formal complaint.



False Complaint:

If the Committee comes across any complaint which upon investigation is found to be false, appropriate disciplinary action may be taken against such an employee.

5. CONFIDENTIALITY:

Individuals involved in the complaints process/system should refrain from divulging the details of the complaint/any information gathered by them in the course of the inquiry and the identities of the persons involved in the case should not be disclosed. Any breach of confidentiality will be taken seriously and the implications of which shall be disciplinary actions as per the rules of the organization.

6. AWARENESS:

Awareness sessions are to be organized to the employees of the Company:

- a) Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention, and redressal of sexual harassment at the workplace intended to promote gender-sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment.
- b) Carry out orientation programs and seminars.
- c) Conduct capacity-building and skill-building programs.
- d) Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees to the provisions of the Act.

7. LEGAL COMPLIANCE:

The ICC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act).

The report shall have the following details:

- number of complaints of Sexual harassment received in the year.
- number of complaints disposed of during the year
- number of cases pending for more than 90 days
- number of workshops or awareness program against Sexual Harassment carried out
- nature of action taken by the employer or District Officer



8. AMENDMENTS TO THE POLICY:

The policy may be amended or modified only by written instrument signed by the duly authorized representatives of the Company.

9. DUTIES OF THE EMPLOYER:

- 1) To provide a safe working environment to all persons at the workplace;
- 2) To aware the employees about the policy to be implemented.
- 3) To organize workshops and training programs at regular levels;
- 4) To Provide necessary facilities to ICC for dealing with complaints and conducting inquiries;
- 5) Provide assistance to a woman if she chooses to file a complaint under the Indian Penal Code or any other applicable law;
- 6) Monitor timely submission of reports by the ICC;

COMPANY'S MOTIVE AND MESSAGE:

The company believes that sexual harassment causes adverse impacts on the Company in terms of:

- Reduced employee motivation
- Low self-esteem of employees
- Low productivity and lower efficiency
- Loss of image of the organization
- Shall be liable to pay damage

The Company also believes that all employees of the organization have the right to be treated with dignity and hence the Company is committed to providing a healthy working environment without any harassment. Sexual or mental harassment at the workplace or other than work place if involving an employee or employees is a grave offense and is therefore punishable.

DISCLAIMER:

Complete care has been taken to incorporate all the relevant provisions of the “Sexual Harassment of Women AT Workplace (Prevention, Prohibition & Redressal) ACT, 2013 into the policy “Prevention of Sexual Harassment at Workplace” (POSH) .However if at any time there is a discrepancy found between the Act & Policy, the provisions of Act shall prevail.



Annexure I

Constitution of Internal Complaints Committee

<u>Sr. No.</u>	<u>Name</u>
1	Mrs. Tejashree Waghlikar - Presiding Officer
2	Mrs. Pornima Jangam- Member
3	Mr. Samadhan Mane - Member
4	(**) Mrs. Asha Shridhar - Member
5	Mrs. Preeti Kanoray – Member
6	(*) Mrs. Dhanashree Sathe - External Member

(*) added as per revised constitution approved as on 13th August, 2024.

(**) added as per revised constitution approved as on 27th May, 2025.

The following representatives co-opted into the ICC to cover the other locations of Aveer Foods Limited:

Factory 1: Shirwal

1. Ms. Savita Pawar
2. Ms. Prachi Kanitkar
3. Mr. Sagar Veer
4. Mr. Subhash Dhumal

Factory 2- Dharwad

1. Mr. Basavraj Hosamani
2. Mr. Sharad Wagh