



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

ALCHEMIE FINECHEM PRIVATE LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

(POSH POLICY)

I. OBJECTIVE

Alchemie Finechem Private Limited (AFPL) is strongly committed to fostering a safe, respectful, and inclusive work environment for all stakeholders, including Employees, Agents, Vendors, Partners, and any other individuals associated with AFPL. We are dedicated to preventing sexual harassment, exploitation, and intimidation in any form.

AFPL places immense value on the dignity and self-respect of every individual. We are committed to upholding these principles, promoting a workplace where all genders are treated as equals, and maximizing productivity through a harmonious and respectful environment.

This policy is formulated in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and its associated rules. The Act aims to protect women from sexual harassment at the workplace, provide mechanisms for redressal of complaints, and address matters connected therewith or incidental thereto. For the purposes of this policy, "Sex" refers to the physical differences between people who are male, female, or intersex. Prevention of sexual harassment at AFPL encompasses protection for all employees from sexual harassment by fellow employees, supervisors, managers, agents, contractors, customers, vendors, partners, and visitors, including outsourced employees.

II. SCOPE

This Policy on "Prevention of Sexual Harassment" (POSH Policy) applies to all "stakeholders" at AFPL.

Sexual harassment is prohibited regardless of the sex of the complainant or the respondent. Harassment can occur within the same sex or between different sexes. The determination of whether an act constitutes sexual harassment will be based on the impact on the complainant, not the intent of the respondent.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

III. DEFINITIONS

- **"Aggrieved Person"**: Any individual, whether employed or not, who alleges to have been subjected to an act of sexual harassment by the Respondent in relation to a workplace.
- **"Company"**: Alchemie Finechem Private Limited (AFPL).
- **"Employee"**: Any person employed at a workplace for any work on a regular, temporary, full-time, consultant operating out of AFPL premises who is supposedly to be treated as a 'deemed employee', ad hoc basis, Interns or daily wages basis, either directly or through an agent, including a contractor, with the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- **"Employer"**: Any person responsible for the management, supervision, and control of the workplace. "Management" includes the person, board, or committee responsible for formulating and administering AFPL's policies.
- **"AFPL Internal Complaints Committee" (AICC)**: The committee constituted by the Company as per this policy.
- **"Respondent"**: The person or group of persons against whom the aggrieved person has filed a complaint and who is employed by the Company.
- **"Sexual Harassment"**: Includes one or more of the following unwelcome acts or behavior (whether directly or by implication):
 - Physical contact and advances.
 - A demand or request for sexual favors.
 - Making sexually colored remarks or remarks of a sexual nature about a person's body or clothing.
 - Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets, or other materials through email, SMS, MMS, WhatsApp, any other social media, or sayings; sexual jokes.
 - Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.
 - Giving gifts or leaving objects that are sexually suggestive.
 - Unwelcome touching and hugging.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

Additionally, the following acts or circumstances, among others, may constitute "sexual harassment" if they occurs or are present in relation to or connected with any act or behaviour of sexual harassment:

- Implied or explicit promise of preferential treatment in employment.
- Implied or explicit threat of detrimental treatment in behavior.
- Implied or explicit threats about present or future employment status.
- Interfering with work or creating an intimidating, offensive, or hostile work environment that may affect the health or safety of an individual
- Humiliating treatment that is likely to affect the health and safety of the aggrieved person.
- Any other acts or behavior.
- Any act that an aggrieved person views as such.
- **"Workplace":** Includes any department, organization, undertaking, establishment, enterprise, institution, office, or branch unit. It also includes any place visited by an employee during the course of employment, including transportation provided by the employer.

IV. AFPL'S INTERNAL COMPLAINTS COMMITTEE (AICC)

Every complaint received will be forwarded to the AICC for redressal. The AICC will:

- Inquire into and advise suitable action on complaints of sexual harassment.
- The Committee at each location shall be constituted by Directors with the following members:
 - A Presiding Officer, who shall be a woman employed at a senior level at the workplace. If a senior-level woman employee is unavailable, the Presiding Officer shall be nominated from administrative units of the workplace.
 - Not less than two (2) Members from amongst AFPL employees, preferably those committed to women's issues, those with experience in social work, or those with legal knowledge.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

- One member from amongst non-governmental organizations or associations committed to women's issues or a person familiar with issues relating to the sexual harassment of women.
- Provided that at least one-half of the total Members so nominated shall be women.
- Committee members will receive necessary training to handle such matters effectively and with sensitivity.
- The committee is responsible for:
 - Receiving complaints of sexual harassment at the workplace.
 - Initiating and conducting inquiries as per the established procedure.
 - Submitting findings and recommendations of inquiries.
 - Coordinating with the employer in implementing appropriate action.
 - Maintaining strict confidentiality throughout the process as per established guidelines.

V. COMPLAINT REDRESSAL MECHANISM

- Any aggrieved employee may submit a written complaint with supporting evidence of sexual harassment to any AICC member within three months of the incident or, in the case of a series of incidents, within three months of the last incident. This period may be extended by AICC for up to three months, with reasons recorded in writing, if circumstances prevented the aggrieved person from filing the complaint within the initial period.
- If the complaint cannot be made in writing, the Presiding Officer or any AICC Member will provide reasonable assistance to the aggrieved employee to make a written complaint.
- If the aggrieved employee is unable to make a complaint due to physical or mental incapacity, death, or otherwise, a complaint may be made by:
 - A legal heir or relative.
 - A co-worker.
 - or Any person with knowledge of the incident, with the written consent of the aggrieved woman.
- The AICC will conduct an inquiry into the complaint in accordance with the principles of natural justice.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

- The Aggrieved Person or authorized person must submit a complaint to the AICC with supporting documents, including names and addresses of witnesses.
- Upon receiving a complaint, the AICC will provide a copy, along with supporting documents, to the Respondent within seven working days.
- The Respondent must file a reply to the complaint, along with their list of documents and witness details, within ten working days of receiving the documents from AICC.
- AICC will investigate the complaint in detail, providing reasonable opportunities to both parties. For the inquiry, AICC has the powers of a civil court regarding:
 - Summoning and enforcing the attendance of any person and examining them under oath.
 - Requiring discovery and production of documents.
 - Any other prescribed matter.
- During the inquiry, both parties must refrain from any form of threat, intimidation, or influencing of witnesses.
- The Committee will ensure confidentiality during the inquiry and take measures to prevent retaliation against witnesses.
- AICC may terminate the inquiry or issue an ex-parte decision if the Respondent or complainant is absent for three consecutive hearings without sufficient cause, provided a 15-day written notice is given to the concerned party.
- The AICC must complete its investigation within 90 days.
- The parties are not allowed to bring any legal practitioner to represent them at any stage of the proceedings.
- For conducting the inquiry, the quorum of the AICC shall be three members, including the Presiding Officer.
- The AICC may, before initiating an inquiry and at the aggrieved person's request, attempt to settle the matter between them through conciliation. However, it must ensure that:
 - No monetary settlement is made as a basis of conciliation.
 - Where a settlement has been reached, the AICC shall record the settlement and forward it to the Company to take action as specified



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

in the recommendation. A copy of the settlement shall be provided to the aggrieved person and the respondent.

- Where a settlement is reached as mentioned above, no further inquiry shall be conducted by the AICC.
- During the pendency of an inquiry, upon a written request by the aggrieved person, the committee may, at its discretion, recommend to the employer:
 - To transfer the aggrieved person or the respondent to another workplace, as deemed fit by the Company.
 - To grant leave to the aggrieved person for up to three (3) months with basic salary, which is in addition to any leave to which they are otherwise entitled.
 - To prevent the respondent from assessing the complainant's work performance.
 - Any other relief that the Committee may deem fit.
- Provided that the aggrieved person must provide a justified reason for such transfer or leave, such as a threat to work in the workplace. Interim relief is not a right that can be demanded by the complainant.

VI. ACTIONS

- The committee shall, upon completion of the inquiry, provide a report of its findings within ten (10) days from the date of completion of the inquiry. This report shall be made available to both the Aggrieved Person and the Respondent.
- If the allegation against the Respondent has not been proven, the Committee will recommend that no action be taken against the Respondent.
- If the AICC concludes that the allegation against the Respondent has been proven, it shall recommend to the Company to consider sexual harassment as misconduct and take action, which may include:
 - Counseling.
 - Written Warning.
 - Suspension.
 - Termination.
- Such action shall be taken within sixty (60) days of the receipt of the final report.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

VII. FALSE ALLEGATIONS

- The complaint of sexual harassment made by any employee shall be taken with utmost seriousness by the Company. However, there shall be zero tolerance for any false accusation.
- If, upon inquiry, the AICC concludes that the allegation was made with malicious intent or that the aggrieved person, or any other person making the complaint on behalf of the aggrieved person, produced false, forged, misleading, doctored, or untruthful documents to prove their case, the AICC may recommend suitable action against the aggrieved person who made the complaint, such as a written apology, warning, etc. In such a case, malicious intent must be established after an inquiry conducted in accordance with the prescribed procedure, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof will not result in action as provided herein. A similar recommendation for taking action may be made against any witness whom the AICC concludes has given false evidence or produced forged or misleading documents.
- The provision (VII.2) is not intended to discourage employees from coming forward with complaints but to make them aware that honesty and integrity are of paramount importance. AFPL recognizes and expects that certain claims may be difficult to prove or support, or may not be found to raise to the level of seriousness deemed necessary to conclude as Sexual Harassment. Complaints falling under such a scenario shall not be considered false accusations.

VIII. AWARENESS

- All Employees, Agents, Customers, Vendors, Partners, and Visitors shall have access to this Policy.
- An awareness program shall be conducted among women employees on the Policy, its content, and the formation of the AICC, in case any woman employee needs to approach the AICC with a complaint. Employees are encouraged to familiarize themselves with the key elements of the policy.
- The Company shall comply with the details set out under Section 19 of the Act to ensure that all employees are provided with a safe working environment at the workplace.
- The Company shall display a notice showing the names of the AICC members in a suitable location.
- The Company shall make a declaration regarding the Policy on sexual harassment every year in the annual report.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

IX. DUTIES OF EMPLOYER (Provision of Section 19 of POSH Act, 2013)

Every employer shall:

- Provide a safe working environment at the workplace, which shall include safety from persons coming into contact at the workplace.
- Display, in a conspicuous place in the workplace, the penal consequences of sexual harassment and the order constituting the Internal Committee.
- Organize workshops and awareness programs at regular intervals to sensitize employees to the provisions of the Act, and conduct orientation programs for the members of the Internal Committee as may be prescribed.
- Provide necessary facilities to the Internal Committee or the Local Committee, as applicable, for dealing with complaints and conducting inquiries.
- Assist in securing the attendance of the respondent and witnesses before the Internal Committee or the Local Committee, as applicable.
- Make available such information to the Internal Committee or the Local Committee, as applicable, as it may require, having regard to the complaint made.
- Provide assistance to the woman if she chooses to file a complaint related to an offense under the Indian Penal Code (45 of 1860) or any other law in force.
- Initiate action under the Indian Penal Code (45 of 1860) or any other law in force against the perpetrator, or, if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace where the incident of sexual harassment took place.
- Treat sexual harassment as misconduct under the service rules and initiate action for such misconduct.
- Monitor the timely submission of reports by the Internal Committee.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

X. MISCELLANEOUS

- The Company, with the approval of the Competent Authority, may make any alteration, amendment, or rescind any clauses of this Policy as and when it deems necessary, as long as it complies with the Act.
- Any such alterations, amendments, or rescinding will be communicated to the employees.
- Nothing in this Policy shall operate in derogation of any law in force or prejudice any right of any employee under any other Rules or Law applicable from time to time.
- The AICC shall prepare an annual report with the following details and submit it to the Management for inclusion in its annual report:
 - Number of Complaints of sexual harassment received during the year.
 - Number of complaints disposed of during the year.
 - Number of cases pending for more than ninety (90) days.
 - Number of workshops or awareness programs against sexual harassment carried out in the year.
 - Nature of action taken by the Company in response to the complaints received.
- The above Annual Report, along with the Management Information System (MIS) containing all relevant data required to be reported by the Company in the Annual Report, shall be maintained by the AICC and submitted to the Senior Management of the Company before the end of each financial year. The report shall be considered complete only once it is accepted.

XI. CONCLUSION

- Complaints relating to Sexual Harassment shall be handled and investigations conducted under the principles of natural justice, on the basis of fundamental fairness, in an impartial and confidential manner to protect the identity of the stakeholders involved, i.e., the employee filing the charge, potential witnesses, and the person(s) accused of improper behavior. All efforts shall be made to ensure objectivity and thoroughness throughout the investigation process.
- The identity and address of the aggrieved employee, respondent, and witnesses must not be published or disclosed to the public or media.



Alchemie Finechem Pvt Ltd

MANUFACTURER OF SPECIALITY CHEMICAL

OFFICE ADD.: 127,UDYOG KSHETRA, 1ST FLOOR, MULUND - GOREGAON LINK ROAD, MULUND (W) MUMBAI - 400 080, MAHARASHTRA.

FACTORY ADD.: Plot No.301 to 430, 433 to 440/3 & 4, Saykha GIDC, Juned Village, Tal.-Vagra, Dist - Bharauch - 392 140, GUJARAT.

CIN NO.: U24100MH2021PTC360973

alchemiefinechem@gmail.com

- The decision of the Company shall be final and binding on the aggrieved employee and Respondent. However, this is without prejudice to any recourse that the Company or the individual concerned may have against the respondent. It shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be deemed fit or available.