

PERSONAL
&
SEXUAL HARASSMENT POLICY

POLICY STATEMENT

OF

CENTENIAL SURGICAL SUTURE LTD.

Manufacturing facility :
B-17, MIDC, Murbad, Thane 421401.
MAHARASHTRA.

PERSONAL
&
SEXUAL HARASSMENT POLICY

POLICY STATEMENT

CENTENIAL SURGICAL SUTURE LTD., is committed to maintaining a positive working and learning environment. CENTENIAL SURGICAL SUTURE LTD., will not tolerate acts of personal and / or sexual harassment or related retaliation against or by any Employee.

This Policy

- 1). Provides a general definition of personal and sexual harassment.
- 2). Prohibits personal and sexual harassment and related retaliation; and
- 3). Sets out procedures to follow when an Employee believes a violation of the Policy has occurred.

It is intended that Employees violating this policy shall be disciplined up to and including TERMINATION OF SERVICES and TAKING LEGAL RECOURSE, if deemed necessary.

Applicability : The above policy is applicable to all the Employees and consultants on the rolls of
CENTENIAL SURGICAL SUTURE LTD.

I. DEFINITIONS:

A). SEXUAL HARASSMENT

Sexual harassment consists of interaction between individuals of the same or opposite sex that is characterized by unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

Conduct of a sexual nature may include, **but is not limited to**, verbal or physical sexual advances, including subtle pressure for sexual activity; touching, pinching, patting, or brushing against; comments regarding physical or personality characteristics of a sexual nature.

Examples of Sexual Harassment are (but not limited to):

Requests for sexual favors, jokes of a sexual nature, suggestive remarks, displaying pictures, posters or cartoons of a sexual nature, displaying pornographic material, making sexually derogatory sounds and comments, whistling, unwelcome touching, sharing sexually suggestive e-mail messages.

The objective of the above sexual harassment behavior might be:

To explicitly or implicitly be a term or condition of an individual's employment and/or performance evaluation. Of unreasonably interfering with an individual's work or performance or creating an intimidating, hostile, or offensive working environment.

B). PERSONAL HARASSMENT

CENTENIAL SURGICAL SUTURE LTD., is committed to maintaining a positive learning and working environment. CENTENIAL SURGICAL SUTURE LTD., does not discriminate on the basis of race, color, origin, sex, age, disability, creed or religion. Employees are expected not to discriminate with other Employees on the above and any such behavior shall be invite serious disciplinary action.

Personal harassment may include, but is not limited to, the following:

- Slurs and jokes about a class of persons (for example, those who are disabled or a member of a minority group)
- Derogatory remarks about a person's geographical origin, race, language or accent.
- Display of explicit or offensive calendars, posters, pictures, drawings or cartoons which reflect negatively upon a person's class.
- Disrespectful comments even if unrelated to a person's race, color, statehood, religion, age or disability.
- Teasing or references to an individual's age or disability.
- Victimization of an Employee based on the above and / or personal bias / dislike.

II. PROHIBITION OF PERSONAL & SEXUAL HARASSMENT

It has to be understood by all concerned that the actual intent of the personal and sexual harassment is irrelevant. What is relevant is the impact of the behavior on the recipient. Further, harassing behavior can be verbal, non-verbal, or physical. "Offensive" is in the eye of the beholder or the recipient of the behavior. What is NOT offensive to one person may be offensive to another,

despite the intent of the alleged offender. Severe acts may be judged based on a single act. Less severe acts may constitute harassment if repeated. CENTENIAL SURGICAL SUTURE LTD., shall ensure explicit protection of the confidentiality of the victim of Harassment, the alleged respondent and the witnesses.

CENTENIAL SURGICAL SUTURE LTD., shall guarantee that neither complainant nor witnesses will be subjected to retaliation.

CENTENIAL SURGICAL SUTURE LTD., prohibits any form of Personal and/or Sexual Harassment by any of its Employees and shall take severe disciplinary action against any person/s found guilty of any such conduct/s.

III. COMPLAINT REDRESSAL PROCESS:

A). Definitions:

i) Prevention of Personal and Sexual Harassment Committee (POPSHC)

CENTENIAL SURGICAL SUTURE LTD., shall nominate the POPSHC committee as per the provisions of Sexual Harassment of Women at Workplace Act 2013, consisting of 3 members excluding the Chairman of the Committee. The Head of the committee would be a woman employed at a senior level in the workplace, besides her there would be 3 other members (Male/Female) including an outsider who would be a member of an NGO or committed to the cause of women or familiar with issues related to sexual harassment.

ii) Complainant: a complainant is a person who is subject to alleged personal or sexual harassment.

iii) **Respondent:** a respondent is a person whose alleged conduct is the subject of a complaint.

iv) **Sexual harassment:** as per 1A above.

v) **Personal harassment:** as per 1B above.

B). Complaint Resolution:

Obligation to Report: In order to take appropriate corrective action, the Company must be made aware of personal/ sexual harassment or related retaliation. Therefore, anyone who believes that s/he has experienced or witnessed sexual harassment or related retaliation should promptly report in writing such behavior to the Chairman or any member of the POPSHC.

Timeline of Reports or complaints under this Policy shall be addressed and resolved as promptly as practicable after the complaint or report is made. Ordinarily, investigations shall be concluded and reports submitted to the reviewing committee no later than 30 days following the receipt of a complaint. Upon receipt of the complaint, the Chairman of the POPSHC shall decide the investigating officer. The investigating officer shall conduct an inquiry and submit the report to the Chairman, POPSHC within 15 days. The POPSHC shall be convened after receipt of the report and the committee shall discuss in detail the findings of the report and determine whether the policy has been violated. It may be understood that all members of the committee and the investigating officer should maintain complete confidentiality. The committee, if required, may ask for additional information / investigation.

If an investigation is conducted, the complainant and the respondent shall have the right to:

- a. Receive written notice of the report or complaint, including a statement of the allegations, soon after the commencement of the investigation as is practicable.
- b. Present relevant information to the investigator(s); and c. Receive, at the conclusion of the investigation and appropriate review, a copy of the investigator's report.

The respondent shall have the opportunity to give his final comments based on (c) above. After the response from the respondent is received the POPSHC shall prepare the final report. The report will then be submitted to the Chairman of the POPSHC.

Any proven case of Personal / Sexual Harassment shall result in termination of employment from the company. Head - HR shall be informed by the Chairman of the POPSHC of the punishment of the respondent, if any and necessary action would be initiated within 1 day. The whole process shall in no case exceed 60 days from the day of submission of complaint.

Note : It is also a violation of this Policy for anyone acting knowingly and recklessly, either to make a false complaint of sexual/personal harassment and/or to provide false information regarding a complaint. In such case strict disciplinary action will be taken by the Company.

Prevention of Personal and Sexual Harassment Committee (POPSHC)

Shri Devraj T. Poojary – Executive Director

Committee Members:

1. Mr. Sanjay M. Sohani (Vice President - Production)
2. Mr. Mahendra Nikam (Manager)
3. Mrs. Rachana Parsekar (Manager)
4. Mrs. Asha Kotian (Manager)

CENTENIAL SURGICAL SUTURE LTD.

Department : Human Resources (HR)

- (1). Deputy Director, Industrial Safety & Health,
Kalyan. MAHARASHTRA.
- (2). The Office of Assistant Commissioner of Labour
Sai Vihar, 2nd Floor, Shivaji Path,
Kalyan (West), Thane. MAHARASHTRA.