



# AJ Packaging Limited

Regd. Office: Plot No. 120, CIE, Gandhi Nagar, Balanagar, Hyderabad - 500037. Telangana

CIN: U74999TG1995PLC020965

## PREVENTION OF SEXUAL HARASSMENT POLICY

### **Background**

A J PACKAGING LIMITED (hereinafter referred to as the "Company") provides equal opportunity and a harassment free workplace notwithstanding race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability, as the case may be. Thus in order to create such a safe and conducive work environment, this Policy has been framed, in line with the provisions of the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" of India (hereinafter referred to as the "Act"1) and existing rules framed thereunder namely the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the "Rules"2).

### **Purpose & Scope**

Purpose of this policy is to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

This policy extends to all employees including individuals coming to the workplace for employment or for any other purpose whatsoever including but not limited to visitors, vendors, contractual resources, seconded and applies to any alleged act of sexual harassment against persons at workplace, whether the incident has occurred during or beyond office hours.

### **Important definitions**

(a) "Aggrieved Individual" means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.

(b) "Complainant" is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

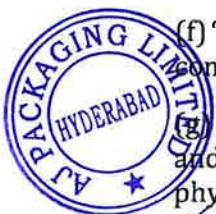
(c) "Company means A J Packaging Limited.

(d) "Employer" means any person who is responsible for management, supervision and control of the workplace'.

(e) "Employee" means 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name

(f) "Internal Committee" means a Internal Complaints Committee constituted by the Company under this policy.

"Sexual harassment" may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.



Works: Plot No. 120 & 129, CIE, Gandhi Nagar, Balanagar, Hyderabad - 500037.

Phone No. 040-23176031, 23086604, Mobile: +91 79937 62123, Email: mail@ajpack.net, accounts@ajpack.net

- a. Sexual Harassment at the workplace includes:
- b. unwelcome sexual advances (verbal, written or physical),
- c. demand or request for sexual favors,
- d. any other type of sexually-oriented conduct,
- e. verbal abuse or 'joking' that is sex-oriented

(h) "Workplace" means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

In addition, the following acts circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- i. Implied or explicit promise of preferential treatment in employment; or
- ii. Implied or explicit threat of detrimental treatment in employment; or
- iii. Implied or explicit threat about the present or future employment status; or
- iv. Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or
- v. Humiliating conduct likely to affect health or safety.

#### **Responsibilities Regarding Sexual Harassment:**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

#### **Formation Of Internal Complaint Committee**

A Presiding Officer who shall be an employee employed at a senior level at workplace from amongst the employees.

- b. Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- c. One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Presiding Officer and every Member of the ICC shall hold office for 3 years

#### **Complaint Mechanism**

(1) Any aggrieved individual may make in writing, a complaint of sexual harassment to the Human Resources (HR) or Administration/personnel Department (through respective Lines of Service HR) or through Company's Ethics Office within a period of three (3) months from the date of incident and in case of more than one incident, within a period of three (3) months from the date of last incident unless the time



*Handwritten signature*

period is extended.

(2) The complaint should clearly mention name and available details of both the aggrieved person and the respondent. Anonymous or pseudonymous complaints will not be investigated.

(3) Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative, as more fully described under Rule 6 of the said Rules, may make a complaint.

(4) The complainant shall submit six copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

### **PROHIBITION ON DISCLOSURE OF INFORMATION**

This policy prohibits any person from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to applicable disciplinary action as outlined in Employee Handbook.

### **PROTECTION TO COMPLAINANT**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

### **CORRECTIVE ACTION/ DISCIPLINARY ACTION**

The corrective action/ disciplinary action may include any of the following:

Formal apology b. Counseling c. Written warning to the perpetrator and a copy of it maintained in the employee's file. d. Change of work assignment/ transfer for either the perpetrator or the victim. e. Withholding or stoppage of Increment/ Promotions. f. Negative impact on performance appraisal. g. Fine h. Compensation to the victim through deduction from the salary of the person found guilty. i. Termination of services of the employee found guilty of the offence without notice or any compensation in lieu of notice

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

### **CONCLUSION:**

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.



**DISSEMINATION OF THE POLICY**

The policy shall be hosted on the website of the Company

Date of Approval by Board of Directors: 06.06.2025

**For A J Packaging Limited**



Mr. Nitin Agarwal  
Managing Director  
DIN: 06381755

