

Prevention of Sexual Harassment (POSH) Policy

Huhtamaki India Ltd ("**Organization**") believes that everyone must get equal opportunity to work, regardless of race, caste, religion, color, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. It believes that a safe and conducive work environment that enables all to work without fear of prejudice, gender bias and sexual harassment, where employer and employees respect each other's integrity and dignity, their privacy, their right to equality and right to opportunity in the workplace, is created. It understands that equality in employment can be seriously impaired when individuals are subjected to discrimination by way of sexual harassment at workplace. Each such incident results not only in the violation of fundamental rights of "Gender Equality" and the "Right to Life and Liberty" under Articles 14, 15 and 21 of the Constitution of India but also in the violation of Article 19 (1) (g).

The Indian Parliament has enacted the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013 along with all amendments from time to time ("**the Law**") with the objective to provide protection against sexual harassment to women at a workplace. Organization recognizes that the Law has been passed as a measure to provide equal opportunity to work for its women population and grant them equality under the Constitution of India. However, Organization also recognizes that other genders aren't immune to sexual harassment and can experience such behaviors at the workplace.

Organization is committed to work and provide support towards provision of a safe and conducive environment at workplace for all its employees, regardless of gender. Additionally, it is committed to create an ethos of acceptance and inclusivity such that individuals regardless of their sexual orientation or sexual preferences, individuals belonging to LGBTQIA community and individuals choosing to not be in any of the socially constructed communities and adopting a fluid/non-binary approach feel respected and accepted at the workplace.

In light of the above, Organization has formulated this policy against sexual harassment at workplace ("**Policy**") as per the Law and as a healthy practice and as part of internal policies is also extending the benefit of the law to not only its women employees, but also to its other employees who may belong to any gender. Thus, this Policy shall be applicable to all complaints of sexual harassment made by anyone against an employee of the Organization. This Policy also extends to employees working virtually or any other location as may be necessary for the employees to perform their duties.

Our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination. Organization shall take strict disciplinary action as provided under this Policy against any persons found guilty of sexual harassment, regardless of the gender.

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1. WHAT IS SEXUAL HARASSMENT?

It is an unwelcome inappropriate behavior (whether directly or by implication) which includes:

- a) Physical contact and advances including touching, deliberately brushing against another person, interference with an individual's normal work movement or assault.
- b) Demand or requests for sexual favors, offensive or unwelcome flirtations, unwanted sexual advances or propositions, threats or suggestive or insulting sounds.
- c) Making sexually colored remarks containing sexual tones/undertones including repeated sexual innuendoes, sexual epithets, derogatory slurs, sexually explicit jokes.
- d) Showing pornography such as derogatory or sexually explicit posters, cartoons, photographs, magazines, drawings, or other printed items; suggestive objects, pictures; emails, screen savers; or other electronic communications; graphic commentaries and leering or obscene gestures.
- e) Having posters, photographs, paintings, etc in the background with any sexual context while being on video calls
- f) The inappropriate behaviors listed above may be committed either verbally or in written form via letters, video calls/audio calls, phone calls, texts, e-mails, , on any social media platform or through any other electronic communication.
- g) Any other unwelcome visual, verbal, or physical conduct of a sexual nature.

These circumstances, among other circumstances, if it occurs or if it is present in relation to or connected with any act of sexual harassment, may amount to sexual harassment:

- a) When either implicitly or explicitly it becomes a condition of the individuals present or future employment
- b) Implied or explicit promise of preferential treatment in employment
- c) Implied or explicit threat of detrimental treatment in employment.
- d) The harassment has a purpose or effect of unreasonably interfering with the work performance or creating an environment, which is intimidating, hostile or offensive
- e) Humiliating treatment likely to affect health or safety

Sexual Harassment is not specific to any gender or from any specific gender – it could be Male to Female, Female to Male, Male to Male, or Female to Female or male or female to transgender or any other. Everyone must exercise their own good judgment to avoid engaging in conduct that may be perceived by others as Sexual Harassment. In all the above cases, it is not the intention of the person behaving but the impact on the person who is subjected to such behavior that will matter.

2. WHAT IS A WORKPLACE?

"Workplace" shall mean all places where Organization's work is carried out. It does not only include physical workspaces but also spaces from where work is carried out remotely or virtually. For example:

- a) All offices or other premises where Organization's business is conducted
- b) All Organization related activities performed at any physical or virtual site

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- c) Any social, business or other functions taking place physically or virtually where the conduct or comments may have an adverse impact on the workplace or workplace relations
- d) Any alleged act of sexual harassment committed during or outside of office hours using any mode of communication including video calls/audio calls, phone calls, text, e-mails, on any social media platform or through any other electronic communication etc..
- e) Any sexual harassment on any social networking website during or outside of office hours
- f) Any place visited by Employee or arising out of or during the course of employment with Organization, including transport services provided by Organization for undertaking such journey, audio/video conferencing applications or any other communication related tools/applications. For example, Employees who are on overseas programs and trainings in course of their employment with the Organization.

3. WHO IS AN EMPLOYEE?

“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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

4. WHO IS A VISITOR / THIRD PARTY?

“Visitor” or “Third Party” includes any person who is visiting the Workplace and is not covered by any of the other categories defined by this Policy. For example, guests coming for physical/online interviews, meetings, events, programs or people walking in for meeting existing Employees, etc.

5. HOW ARE CONCERNS RELATED TO SEXUAL HARASSMENT REDRESSED?

Organization has constituted an Internal Committee (“IC”) for receiving and redressing complaints related to Sexual Harassment at Workplace.

a) Constitution of the IC:

At all times, the IC shall comprise of the following:

- i) A senior level woman Employee shall be appointed as Presiding Officer of the IC (“Presiding Officer”). The Presiding Officer shall automatically vacate her office upon ceasing to be Employee of Organization.
- ii) Minimum two (2) members of the IC will be appointed from amongst Employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field. These members shall automatically vacate office upon ceasing to be Employee of Organization.
- iii) Minimum one (1) member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual

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Harassment. This member shall vacate office upon termination of contract with Organization.

- iv) At least one-half of the total members nominated to the IC shall be women.

All IC members are duty bound to handle all complaints without any bias or partiality towards any party. The term for the IC is a maximum of 3 years.

b) Removal of IC members:

An IC member shall be removed / replaced in the event that the IC member:

- i) breaches confidentiality
- ii) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against them
- iii) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against them
- iv) has abused their position as to render their continuance in office prejudicial to the public interest
- v) Any vacancy created in the IC due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by Organization in accordance with its guidelines and in conjunction with provision of Law (where applicable).

Details of IC are given in Annexure 1.

6. WHO CAN FILE A COMPLAINT?

Anyone, of any age or gender whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent ("Aggrieved Person") and the term "Respondent" shall refer to the person (i.e. the Employee of the Organization as defined above) against whom the complaint of sexual harassment has been filed.

7. WHAT IF AGGRIEVED PERSON IS UNABLE TO MAKE A COMPLAINT?

If the Aggrieved Person is unable to make a complaint on account of their physical incapacity, a complaint may be filed, with the written consent of the Aggrieved Person by:

- a) their relative or friend; or
- b) their co-worker; or
- c) an officer of the National Commission for Women or State Women's Commission; or
- d) any person who has knowledge of the incident

If the Aggrieved Person is unable to make a complaint on account of mental incapacity, a complaint may be filed by:

- a) their relative or friend; or
- b) a special educator; or
- c) a qualified psychiatrist or psychologist; or
- d) the guardian or authority under whose care they are receiving treatment or care; or

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- e) any person who has knowledge of the incident jointly with the Aggrieved Person's relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care they are receiving treatment or care.

If the Aggrieved Person for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with their written consent. If the Aggrieved Person is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Any of the persons referred to above, who may file a complaint on behalf of the Aggrieved Person shall be referred to as the "Complainant." Any reference to the term 'Complainant' throughout this Policy shall mean reference to 'Aggrieved Person' and / or the 'Complainant' as applicable.

8. HOW TO FILE A COMPLAINT?

The Complainant can make a complaint of Sexual Harassment to the IC. The following need to be kept in mind:

- a) The complaint has to be in writing.
- b) The Complainant should provide (if possible) as many specific details as possible including incidents, dates and people that are involved in their complaint. Details with respect to the following may be provided while filing a complaint:
 - i) The alleged event, matter or issue that is subject to the complaint (time/date/place etc.)
 - ii) The name and details of the Respondent against whom the complaint is being filed
 - iii) Names and addresses of the witnesses (if any)
 - iv) Details of documentary evidence (if any) such as WhatsApp chat records, SMS, E-mails, CCTV Footage, Audio / Video recording etc. and
 - v) Any additional information, documentation or other evidence available to support the complaint (if any)
- c) Complaint must be made within a period of **3 (three) months** from the date of incident and in case of a series of incidents, within a period of **3 (three) months** from the date of last incident.
- d) The IC, at its discretion, can extend the time limit for receiving a complaint to another period of **3 (three) months** if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the **first 3 (three) months**.
- e) IC will record the reasons for such extension of **3 (three) months** in writing.

If the Complainant needs assistance in writing the complaint, they can seek help from IC. The complaint can be submitted electronically at internalcommittee_hil@huhtamaki.com to the IC or with any of the IC members (details provided in **ANNEXURE 1**). Complaints can also be physically submitted with any of the IC members (Details provided in **Annexure 1**).

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9. WHAT IF COMPLAINT IS AGAINST SOMEONE WHO IS NOT AN EMPLOYEE OF THE ORGANIZATION?

If any Employee/Third Party is sexually harassed by any external party who is not an Employee of the Organization, either in Organization premises or in that external party's premises, then IC shall contact either the internal committee of that external party and / or the Police (as the case may be), on the written complaint of such Employee/Third Party to the Organization's IC and on their request that such complaint be transferred to other IC and address the matter to satisfactory closure. Alternatively, Employee/Third Party may choose to reach out directly to IC of that external party and / or Police (as the case may be) and Organization will offer assistance on written request by Employee/Third Party.

REPORTING



10. WHAT IS THE PROCESS FOR HANDLING COMPLAINTS BY IC?

a) Process for Conciliation:

Prior to initiating an inquiry, the IC may, at the written request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation. The following need to be kept in mind with respect to conciliation:

- i) It is not mandatory for Complainant to request for Conciliation.
- ii) Conciliation cannot be done if inquiry has already started.
- iii) In case a settlement has been arrived at, the IC shall record it and forward it to Organization to take action as specified in the recommendation of the IC.
- iv) The IC will also provide copies of the settlement as recorded to the Complainant and the Respondent.
- v) If conciliation has been reached, the IC will not be required to conduct any further inquiry.
- vi) Monetary settlement cannot be made the basis of such conciliation.

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- vii) If Complainant feels that the terms of Settlement are not being complied with by the Respondent or action has not been taken by Organization, Complainant can make a written complaint to the IC to conduct an inquiry into the complaint.

b) Procedure for Inquiry:

If the Complainant does not wish to go for conciliation or if the conciliation reached between the parties is not complied with, the IC shall, upon a written request from the Complainant to do so, proceed to make inquiry into the complaint in the manner as provided under the Service Rules and Law, as may be applicable to the Respondent and if no service rules are applicable, then as per the process prescribed under this Policy and the Law. The following need to be kept in mind with respect to inquiry:

- i) On receipt of the complaint, the IC shall send copy of the complaint received from the Complainant to the Respondent within a period of **7 (seven) working days**. If the complaint has been received on email, the IC member shall forward the same to the Respondent, with clear instructions that the same is not to be shared with anyone and strict confidentiality has to be maintained.
- ii) The Respondent shall file the reply to the complaint along with list of documents and names and addresses of witnesses (if any), within a period of **10 (ten) working days** from the date of receipt of the documents.
- iii) If the Complainant or the Respondent desires any witness/es to be called, they shall communicate in writing to IC the names of witness/es whom they propose to call.
- iv) If the Complainant desires to tender any documents by way of evidence before IC, they shall supply copies of such documents. Similarly, if Respondent desires to tender any documents in evidence before IC they shall supply copies of such documents. Both shall affix their signature on the respective documents to certify these to be authentic documents.
- v) The IC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be necessary for the inquiry process. Any refusal by any Employee of Organization to attend any hearing before the IC when summoned or to provide to the IC, any documents and / or information within their power or possession shall constitute as misconduct, rendering such Employee for adverse action by Organization.
- vi) The IC shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for 3 (three) consecutive hearings convened by the
- vii) Presiding Officer. Such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the Complainant or Respondent as the case maybe.
- viii) In conducting the inquiry, at any point of time, the Complaint shall be heard by a minimum of 3 (three) members including the Presiding Officer and the External Member and IC shall complete the inquiry within reasonable period but not beyond 90 (ninety) days.
- ix) IC shall notify in writing, the time and dates of its meetings to the Complainant, the Respondent and witnesses.

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- x) All inquiry proceedings will be documented in detail and treated as strictly confidential with restricted viewing only on need-to-know basis.
- xi) Inquiry proceedings shall be minuted / recorded in writing. They may be audio recorded as well (where possible). The minutes / transcribed record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned and IC in token of authenticity thereof.
- xii) All colleagues and witnesses who are part of the IC proceedings will need to sign a confidentiality declaration.
- xiii) The Complainant and Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the IC.

c) The things IC shall keep in mind while inquiring into a complaint:

- i) The IC shall make an inquiry into the complaint in accordance with the principles of natural justice such that IC shall provide every reasonable and fair opportunity to the Complainant as well as to the Respondent, for putting forward and defending their respective side.
- ii) The IC shall be sensitive to the often covert, private and insidious nature of sexual harassment and shall take into account that often the Complainant may not be able to submit or present direct or corroborative evidence.
- iii) The IC shall take note of the respective socio-economic positions of the parties, their hierarchy in the Workplace, and other power differentials while giving recommendation.
- iv) While inquiring into a complaint, IC shall take note that in cases of harassment via postings and messages through electronic and social media, the IC shall consider the public humiliation that this involves for the Complainant as well as the unwitting exposure of others who are using this media to circulate such messages and images.

11. CAN ANY ACTION BE TAKEN DURING PENDENCY OF INQUIRY?

During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend any of the following to Organization:

a) In case Complainant and/or Respondent are Employees, any one or more of the following may be recommended:

- i) Grant leave to the Complainant up to a period of 3 (three) months (the leave granted shall be in addition to the leave the Complainant is otherwise entitled to)
- ii) Transfer the Complainant or Respondent to any other workplace
- iii) Restrain the Respondent from reporting on the work performance of the Complainant or writing their confidential report and assign the same to another Employee (if applicable)
- iv) In case the complaint has been filed by an intern or an apprentice working under the Respondent, restrain the Respondent from supervising any official / academic activity of the Complainant and assign the same to another Employee.
- v) Direct the Respondent to not communicate with the Complainant in any manner including any mode of electronic communication such as text messages, emails, , video/audio calls, on any social media platform or via any other mode of electronic communication.

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- vi) In case complaint is filed by a Complainant, the same benefits as above would apply, depending on facts and circumstances.

The Organization reserves the right to require any of the parties to take any leaves during pendency of inquiry any time after receipt of a complaint of sexual harassment until the IC has concluded its inquiry, if required, based on recommendation of IC. Any such decision will be communicated in writing to the party by the Organization. This is to ensure that there is no retaliation against any party. The Organization reserves the right to require parties to work from home or from an alternate Organization location during the pendency of inquiry.

- b) **In case Respondent is a Visitor / Third Party, any one or more of the following may be recommended:** If the Respondent is a Visitor / Third Party adequate steps to ensure that they do not enter Organization premises or contact/threaten Complainant/Witnesses directly or indirectly using any mode of communication. IC to suggest appropriate disciplinary action by the concerned authority including reaching out to the Police if required with consent of Complainant.

12. WHAT IS AN INQUIRY REPORT AND WHAT ACTIONS CAN BE SUGGESTED UNDER IT?

On completion of inquiry, the IC shall provide a written report of its findings and recommendations to Organization within **10 (ten) days** from date of completion of the inquiry. Such report shall also be made available to Complainant and Respondent. The inquiry report shall specify details of the allegations against the Respondent, the statements made, and evidence presented by the Complainant, Respondent and / or witnesses, IC's findings along with a statement giving reasons for the findings arrived at by the IC and IC's recommendations.

- a) **In case allegations against Respondent have not been proven:**

In the event that the IC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to Organization that no action is required to be taken in the matter.

- b) **In case allegations against Respondent have been proven:**

Where the IC determines that sexual harassment has taken place, to whatever extent, immediate corrective and preventive measures will be recommended. Severity of recommendation will be determined by the first time/ misunderstanding/ habitual offender etc.

- i. **Where Respondent is an Employee, IC may recommend any one or more of the following:**

Where the Committee arrives at the conclusion that the allegation against the Respondent has been proved, where Respondent is an Employee, it will recommend to the Company:

1. To take action for sexual harassment as a misconduct as per Organization Policy.
2. To take action as per the service rules applicable to the Respondent and where no service rules are applicable to take any action including:
 - A written apology from the Respondent
 - A letter of warning may be given to the Respondent that will be placed in the personnel file
 - Reprimand or censure the Respondent
 - Withholding the promotion or reduction in rank
 - Withholding of pay rise or increments

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- Immediate transfer or suspension without pay
- Termination from service / dismissal from the services of Organization
- Undergoing a counselling session
- Carrying out community service
- deduction from salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Complainant or to their legal heirs. In case, Organization is unable to make deductions from salary of the Respondent due to them being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum, the IC may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

IC may consider various factors as required under Law for the purpose of determining the sums to be paid to the Complainant and may take the following into consideration:

- the mental trauma, pain, suffering and emotional distress caused to the Complainant
- the loss in the career opportunity due to the incident of sexual harassment
- medical expenses incurred by the victim for physical or psychiatric treatment
- the income and financial status of the Respondent
- feasibility of such payment in lump sum or in instalments

ii. **Where the Respondent is a Third Party, IC may recommend any one or more of the following:**

- Warning to employing Organization/association/firm (if any)
- Declaring the Workplace/Organization out of bounds to the Respondent
- Withdrawal of the right to provide services to Organization for a certain period (if applicable)
- Helping the Complainant in filing an FIR, should they desire
- Debarring/blacklisting such person from Organization
- Other similar or appropriate punishment

Organization shall act upon the recommendation given by IC within **60 (sixty) days** of receipt of the recommendation.

c) **In case it is proven that the Complaint is malicious:**

- i) If on inquiry, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the Respondent / tarnishing their image in Organization or otherwise and/or to settle personal / professional scores, strict action will be recommended by IC against the Complainant. Hence, in case IC arrives at a conclusion that allegation against the Respondent is malicious or Complainant has made the complaint knowing it to be false or has produced a forged or misleading document, IC may recommend to Organization to take an action applicable to Respondent if the complaint was genuine. In this regard, IC may recommend any of the actions specified above (As applicable).
- ii) A mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant as the malicious intent on the part of the Complainant will

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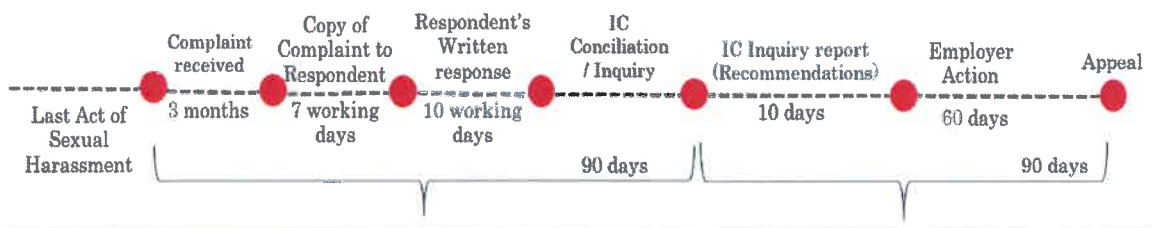
have to be established through the inquiry process before an action against such Complainant is recommended.

13. PROCEDURE FOR FILING AN APPEAL

In case the inquiry process is conducted by the IC and the Complainant is a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations may file an appeal to the Appellate Authority as per service rules and/or as per other provisions of Law within 90 (ninety) days of the recommendations.

In case the inquiry process is conducted by the IC and the Complainant is not a woman, any party aggrieved (Complainant or Respondent) by the recommendations of the IC and / or non-implementation of recommendations can get in touch with Steering Committee comprising of Managing Director, Head of HR & EHS, VP General Counsel Asia Pacific who will review the appeal.

TIMELINES



14. CONFIDENTIALITY

All discussions / decisions pertaining to an incident of sexual harassment must be kept confidential. Therefore, contents of the complaint made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, inquiry report including recommendations of the IC and action taken on the Respondent shall not be published, communicated, or made known to the public, press and media in any manner. However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity, or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Appropriate information will be shared with Government authorities as per the Act. If any person breaches confidentiality, they shall be liable for penalty as per service rules and / or Law. Organization shall recover a sum of rupees five thousand (5,000) as penalty from such person and may take any other action as it may deem fit.

15. PROTECTION AGAINST RETALIATION

There will be no retaliation against anyone who, in good faith, files a complaint or participates in any way in the inquiry of a complaint. Organization will not allow retaliation against that person. Individuals engaging in retaliatory conduct will be subject to strict disciplinary action and if

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necessary legal action and/or a police complaint. If you suspect that you or someone you know has been retaliated against for raising an issue, immediately contact the IC.

16. FILING OF COMPLAINT WITH POLICE

Nothing in these rules and procedures shall preclude anybody from simultaneously lodging a complaint with the police in respect of any act amounting to an offence under the law. Organization will provide assistance in this regard, if assistance is sought. This Policy is not intended to impair or limit the right of any Employee seeking a remedy available under any law. Proceedings under this Policy shall continue notwithstanding any proceedings initiated by a Complainant (as defined hereinafter) against Respondent under any law in force.

In case of a complaint of sexual harassment or any other offense against a child, as per the Protection of Children from Sexual Offences Act, 2012 ("POCSO"), or in case of offense by a child, the provisions under POCSO and Juvenile Justice (Care and Protection of Children) Act, 2015 may become applicable and would have to be dealt with in accordance with these laws. A child is any person below the age of eighteen years.

17. AVAILABILITY OF MENTAL HEALTH SERVICES

The Organization shall provide assistance via Employee Assistance Program (EAP) to any of the concerned parties on request as may be required from time to time. Do connect with local HR for EAP details.

18. RESPONSIBILITIES OF EMPLOYEES

- a) Everyone has a personal responsibility to ensure that their behavior is not contrary to this Policy.
- b) Set an example of dignified workplace behaviour and ethical standards in line with Organization's values and code of conduct.
- c) To be mindful of professional and personal boundaries while performing your duties for the organization and representing the organization.
- d) Create and sustain a healthy work environment.
- e) Do not ignore or allow an inappropriate behavior to continue regardless of who is creating that situation.
- f) Support and cooperate during any inquiry of a complaint, including testifying as witness and giving full and truthful disclosure of all factual information when asked by the IC, while ensuring that complete confidentiality is maintained throughout, about any complaint of sexual harassment within Organization.
- g) Be aware that Organization will take allegations seriously and will ask their cooperation in an inquiry if they bring a complaint forward.
- h) Handle information related to known or suspected violations of this Policy in a discreet and confidential manner and not attempt to investigate / inquire into the information or suspected violations of this Policy on your own i.e. without involving the IC.
- i) Report any inappropriate behavior to IC immediately.
- j) Do not misuse the policy or the law by filing malicious complaints for settling personal scores, seeking revenge or for personal gains and benefits etc.

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- k) To remember that on social media, the employees represent the Organization and therefore to ensure that they post information/comment/opinion that is responsible, professional and protect the interests of the Organization.
- l) With respect to virtual working:
 - (i) Ensure that video/audio calls are scheduled during working hours as much as possible.
 - (i) State the preferred modality (video or audio) while scheduling the meeting/ blocking other person's calendar & allow for flexibility for the individual to confirm
 - (ii) Seek consent before requesting for a video call for a one-on-one conversation
 - (iii) Do not insist on video calls where not necessary, and/or if your colleague/s expresses difficulty in joining via video call.
 - (iv) While on video/audio calls, be mindful of the professional boundaries, and do not initiate conversations/jokes that could make others uncomfortable.
 - (v) While on video calls, ensure that a professional dress code is followed, and the background does not have anything inappropriate.
 - (vi) Do not share/forward inappropriate or offensive posts or images on team chat or social media, etc
 - (vii) Do not forward any personal message, image, or video sent to you without sender's consent
 - (viii) Do not repeatedly send messages to engage in personal discussions, comment, like on posts, pictures etc. in absence of any positive, enthusiastic response
 - (ix) Do not repetitively ask any employee to accept your friend/follow request on any social media platform
 - (x) Do not engage in online bullying, stalking or harassment.

19. RESPONSIBILITIES OF THE IC

- a) Receive and address complaints of sexual harassment and inquire into complaints in detail
- b) Assist Complainant in filing the complaint in case the Complainant is unable to do so.
- c) Inquiry shall be a priority for an IC member.
- d) Ensure quorum of minimum three (3) members is met during all Inquiry meetings, with mandatory presence of the Presiding officer at all inquiry meetings.
- e) Seeking consent from involved parties and witnesses for audio/video recording of the inquiry proceedings.
- f) Follow the principles of natural justice and treat the Complainant, Respondent, witnesses, and related persons to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions. All members of the IC shall be acting without any prejudice or bias while conducting inquiries or dealing with complaints of sexual harassment in any other manner.
- g) Make efforts to ensure that the Complainants and the witnesses are not further victimized or discriminated against while the complaint is pending.
- h) Recuse themselves from their assigned job for the purpose of conducting an Inquiry if there is conflict of interest or a bias coming in the way of conducting a fair Inquiry.
- i) Take appropriate measures to ensure confidentiality of the inquiry process while conducting inquiry physically or virtually.
- j) Document in detail all the inquiry proceedings and the inquiry report.

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- k) Refrain from talking about a potential, pending or completed case of sexual harassment to any member directly or indirectly connected to any form of media, including print, Television, online media etc.
- l) Review the status of all complaints received.
- m) Recommend action against anyone who threatens or intimidates the Complainant or members of the IC.
- n) Read and acquaint themselves with the Policy and attend trainings on this subject matter.
- o) Compile annual reports and submit to the concerned authorities.
- p) In the event, the complaint does not fall under the purview of sexual harassment, or the complaint does not mean an offence of sexual harassment, forward the same to the concerned person / committee.

20. ORGANIZATION'S RESPONSIBILITIES

- a) Organization will not tolerate any act of sexual harassment. It shall treat sexual harassment as 'Misconduct' and take prompt, appropriate action for the same.
- b) It will organize gender-sensitization workshops and awareness programs at regular intervals covering all locations.
- c) Shall raise awareness about the prevention of sexual harassment through posters, calendars, mugs and other mediums
- d) To sensitize managers to conduct calls/meetings during working hours as much as possible, and to not insist on any employee/team member to attend video calls, where not necessary and/or if they express difficulty in joining via video call.
- e) It will ensure that necessary facilities and information are provided to the IC including technical support for dealing with the complaint and conducting an inquiry.
- f) Assist in securing the attendance of Respondent and witnesses before the IC and make available such information to the IC as it may require with regards to the complaint.
- g) Provide assistance to the IC in any manner feasible to conduct a fair and expeditious inquiry and implement recommendations made by IC.
- h) Provide assistance to the Complainant if the Complainant chooses to file a complaint in relation to the offence under the Indian Penal Code. Cause to initiate action, under the Indian Penal Code, against Respondent or if the Complainant so desires, where the Respondent is not an Employee, in the workplace at which the incident of sexual harassment took place.
- i) Cause to initiate action, under the Indian Penal Code, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.
- j) Offer counselling sessions to anyone impacted by incident of sexual harassment.
- k) Do all other things it may deem fit for successful implementation of this Policy.

21. AMENDMENTS

Organization reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to sexual harassment at workplace. This Policy shall be reviewed bi-annually or as and when key issues get raised to incorporate amendments.

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This Policy does not intend to create any contractual obligation for or with Organization, and in case of dispute with the Law and the Policy, the Law shall prevail.

This policy comes into effect December 1, 2022.

Prepared by



Sonalika Bhaskar
Senior Talent Management
Manager

Reviewed by



Jeyamalini Natesan
Head of HR & OHS

Approved by



Dhananjay Salunkhe
Managing Director

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Annexure 1

Members of the Internal Committee

Name	Internal Designation	Designation in the IC	Contact details	Location for which IC member has been appointed
Ms. Sonalika Bhaskar	Senior Talent Management Manager	Presiding Officer	Sonalika.bhaskar@huhtamaki.com	HIL
Ms. Sunita Shilewant	Facility Manager	Member	Sunita.shilewant@huhtamaki.com	HIL
Ms. Sana Hakim		External Committee Member	Sana.hakim@equilibrioadvisory.com	HIL
Ms. Bindiya Rao		External Committee Member	Bindiya.rao@equilibrioadvisory.com	HIL
Ms. Neha Phale	Senior Public Affairs Manager	Member	Neha.phale@huhtamaki.com	CHQ
Ms. Durga Konduri	Marketing & Business Development Manager	Member	Durga.konduri@huhtamaki.com	CHQ
Mr. Suhael Pereira	Head of Operations, Flexibles	Member	Suhael.pereira@huhtamaki.com	CHQ
Mr. Sumit Mendon	Senior Treasury and Credit Manager	Member	Sumit.mendon@huhtamaki.com	CHQ
Mr. Amol Khullodkar	Industrial Relations Manager	Member	Amol.khullodkar@huhtamaki.com	Khopoli
Ms. Sneha Gokhale	Cylinders Specialist	Member	Sneha.gokhale@huhtamaki.com	Khopoli
Ms. Priya Kadam	Costing Coordinator	Member	Priya.kadam@huhtamaki.com	Khopoli
Mr. Purushottam Singh	Operations Manager	Member	Purushottam.singh@huhtamaki.com	Silvassa
Ms. Yogita Mestry	Technician Shrink Sleeves	Member	Yogita.mestry@huhtamaki.com	Silvassa

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Ms. Jeba Akhtar	Planning Assistant	Member	Jeba.akhtar@huhtamaki.com	Guwahati
Mr. Jogeshwar Prasad Gupta	Environment Health & Safety Specialist	Member	Jogeshwar.gupta@huhtamaki.com	Guwahati
Mr. Neelayan Dass	Manager - HR & Administration	Member	Neelayan.dass@huhtamaki.com	Guwahati
Ms. Minakshi Saikia	Junior Engineer, Printing	Member	Minakshi.saikia@huhtamaki.com	Guwahati
Mr. Suresh Miriyala	HR & Administration Specialist	Member	Suresh.miriyala@huhtamaki.com	Sri City
Mr. Vishal Solanki	Regional Plant Controller	Member	Vishal.solanki@huhtamaki.com	Sri City
Ms. Priyanka Yadav	Quality Assurance Specialist	Member	Pa2373@huhtamaki.com	Sri City
Ms. E Sivasree	Supply Chain - Manager	Member	E.sivasree@huhtamaki.com	Flexibles, Hyd
Ms. P Sridevi	Senior HR & Admin Specialist	Member	P.sridevi@huhtamaki.com	Flexibles, Hyd
Mr. R Tirupathi Rao	Manager – HR & Admin	Member	Reddi.rao@huhtamaki.com	Flexibles, Hyd
Mr. Bipul Bibhakar	Manager – Business Excellence	Member	Bipul.bibhakar@huhtamaki.com	Flexibles, Hyd
Ms. Sumedha Pathak	QA- Specialist	Member	Sumedha.pathak@huhtamaki.com	Rudrapur
Mr. Gagneesh Kumar	Plant Operations Manager	Member	Gagneesh.kumar@huhtamaki.com	Rudrapur
Mr. Pankaj Pal	Operation Manager	Member	Pankaj.pal@huhtamaki.com	Sikkim
Ms. Susma Rai	Stores Assistant	Member	Susma.rao@huhtamaki.com	Sikkim
Mr. Rakesh Sharma	Supervisor - Production	Member	a.rakesh@huhtamaki.com	Sikkim
Ms. Shiwani Das	Sales Coordinator	Member	Shiwani.das@huhtamaki.com	Sikkim
Ms. Saroj Sehgal	Sr. Production Assistant	Member	Saroj.sehgal@huhtamaki.com	Baddi
Mr. Vashishth K. Dave	Manager – HR & Admin	Member	Vashishth.dave@huhtamaki.com	Baddi

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Ms. Pooja Shitole	Senior Sourcing Coordinator	Member	Pooja.shitole@huhtamaki.com	Daman
Mr. Vikas Dubey	HR & Administration Specialist	Member	Vikas.dubey@huhtamaki.com	Daman
Mr. Vivek Kumar	EHS & Engineering Specialist	Member	vk1825@huhtamaki.com	Daman
Mr. Siddharth Shukla	Manager - Printing	Member	Siddharth.shukla@huhtamaki.com	Daman
Ms. Priyanka Rangaiah	Senior Sales Coordinator	Member	Priyanka.rangaiah@huhtamaki.com	Bengaluru
Ms. Shymala V	Senior Quality Assurance Specialist	Member	Shyamala.v@huhtamaki.com	Bengaluru
Mr. Vikas Tate	Manager - HR & Administration	Member	Vikas.tate@huhtamaki.com	Bengaluru
Mr. Samir Patkar	Sr. HR & Administration Specialist	Member	Samir.patkar@huhtamaki.com	Mahape
Ms. Reshma Sutar	Senior Sales Coordinator	Member	Reshma.sutar@huhtamaki.com	Mahape
Mr. J. Srikanth Jala	Q.A Specialist	Member	Srikanth.jala@huhtamaki.com	Labels Hyderabad
Ms. Deepa Sarkar	Q.A Assistant	Member	Deepa.sarkar@huhtamaki.com	Labels Hyderabad
Mr. Animesh Biswas	Manager – HR	Member	Animesh.biswas@huhtamaki.com	Labels Hyderabad
Ms. Mettilda C.	Senior Prepress Assistant	Member	Mettilda.c@huhtamaki.com	Cylinder Bengaluru
Ms. Nayana DN	Sales Assistant	Member	nayanadn.nandishwara@huhtamaki.com	Cylinder Bengaluru
Mr. Aman Sharma	HR & Admin Specialist	Member	Aman.sharma@huhtamaki.com	Cylinder Bengaluru
Ms. Swapna Ghorpade	Sr. HR Specialist	Member	Swapna.ghorpade@huhtamaki.com	Taloja
Mr. Amol Shelke	Sr. HR & Admin Specialist	Member	Amol.shelke@huhtamaki.com	Taloja

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Ms. Suma Pillai	Indirect Sourcing Specialist	Member	Suma.pillai@huhtamaki.com	Taloja
Mr. Ashish Palange	Senior Plating Assistant	Member	Ashish.palange@huhtamaki.com	Taloja
Ms. Samrudhi Datey	Sales Coordinator	Member	Samrudhi.datey@huhtamaki.com	Taloja

If you are unable to make a complaint in writing for any reason, you may contact any of the members of the IC (details of whom are provided above) and they shall render assistance to you for making the complaint in writing.

You may file a complaint in person during office hours with IC or submit the same to IC electronically at mail to: internalcommittee_hil@huhtamaki.com

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