

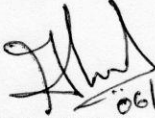
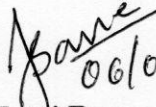
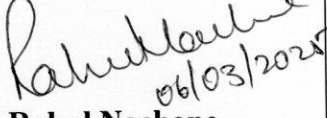


NGL Fine-Chem Limited

Regd. Office : 301, E Square, Subhash Road, Vile Parle (East), Mumbai-400 057, Maharashtra, India.

CORPORATE HR & ADMINISTRATION

Title of Document : Prevention of Sexual Harassment (POSH) Policy

Document Number	NGL/CHR/04-00	Page No.:	Page 1 of 6
Effective Date	10 th March 2025	Next Revision Date	9 th March 2028
Activity	Prepared By	Reviewed By	Approved By
Signature & Date	 06/03/2025 Rahul Naik	 06/03/2025 Jyoti Bane	 06/03/2025 Rahul Nachane
Designation	HR & ADM Designee	Head Corporate HR & ADM	Managing Director

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1. Objective

To prevent, prohibit, and address sexual harassment of women at the workplace in accordance with *The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013*. The company is committed to ensuring a safe, respectful, and dignified work environment for all employees.

2. Definition of Sexual Harassment

Sexual harassment includes unwelcome acts such as:

- Physical contact and advances
- A demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any unwelcome physical, verbal, non-verbal, or digital conduct of a sexual nature
- Any behavior that creates a hostile work environment with sexual intent
- Any implied or explicit promise of preferential treatment or threat of detrimental treatment based on sexual conduct

3. Scope

This policy applies to:

- All employees (permanent, temporary, trainees, contractual workers)
- Third parties such as vendors, clients, consultants, and visitors interacting with employees in work-related settings
- All company workplaces, including branch offices, project sites, client locations, and virtual work environments

4. Internal Complaints Committee (ICC)

The company will establish an ICC at all locations with 10 or more employees.

- The ICC will consist of at least 4 members:
 - A senior female employee as the Presiding Officer
 - At least two other employee members
 - One external member with expertise in women's rights or social work
- At least half the members will be female
- Each member's tenure will not exceed three years but may be re-nominated
- The ICC will meet at least twice a year or as required, and minutes of meetings will be documented confidentially
- The list of ICC members is attached as **Annexure I**



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5. Local Complaints Committee (LCC)

If the aggrieved woman is dissatisfied with the ICC’s response or if the company has fewer than 10 employees, she may escalate the complaint to the Local Complaints Committee (LCC) established by the district administration.

6. Complaint Process

- The complaint should be filed within **three months** of the incident (extendable to six months under special circumstances).
- A written complaint can be submitted directly to the ICC or via email. A specimen complaint letter format is provided in **Annexure II**.
- If the complainant is unable to file due to incapacity, a legal heir, relative, friend, co-worker, or any person with knowledge of the incident may file with her consent.
- Upon receiving the complaint, the ICC will:
 - Acknowledge receipt within **seven days**
 - Provide an option for conciliation (only at the request of the complainant, with no monetary settlement)
 - Initiate an inquiry and complete it within **90 days**
 - Submit recommendations within **10 days**
 - The employer must act on the recommendations within **60 days**

7. Confidentiality

All information related to the complaint, identity of the complainant, respondent, and witnesses, as well as inquiry proceedings, will be kept strictly confidential. Unauthorized disclosure may lead to disciplinary action.

8. Protection Against Retaliation

No employee shall face retaliation or adverse action for filing a complaint or participating in an investigation. Any retaliatory behavior will be treated as misconduct and subject to disciplinary action.

9. Disciplinary Action

Based on the ICC’s findings, appropriate action will be taken, which may include:

- Written warning
- Transfer
- Counseling
- Community service
- Withholding increments or promotions



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- Termination of employment
- Assistance to the complainant for legal action under relevant laws

10. Training and Awareness

- Regular awareness programs and training sessions will be conducted for employees and ICC members
- POSH compliance training is mandatory for all employees

11. Annual Reporting

- The ICC will submit an annual report to the **District Officer** by **31st January** each year, detailing:
 - Number of complaints received
 - Status of resolved cases
 - Training and awareness programs conducted
- The company will also file a declaration with the **Registrar of Companies (ROC)** confirming POSH compliance

12. False Complaints

- If a complaint is found to be malicious, appropriate action may be taken against the complainant as per company policy
- However, lack of proof does not mean the complaint was false, and no action shall be taken if the complaint was made in good faith

13. ICC Contact Details

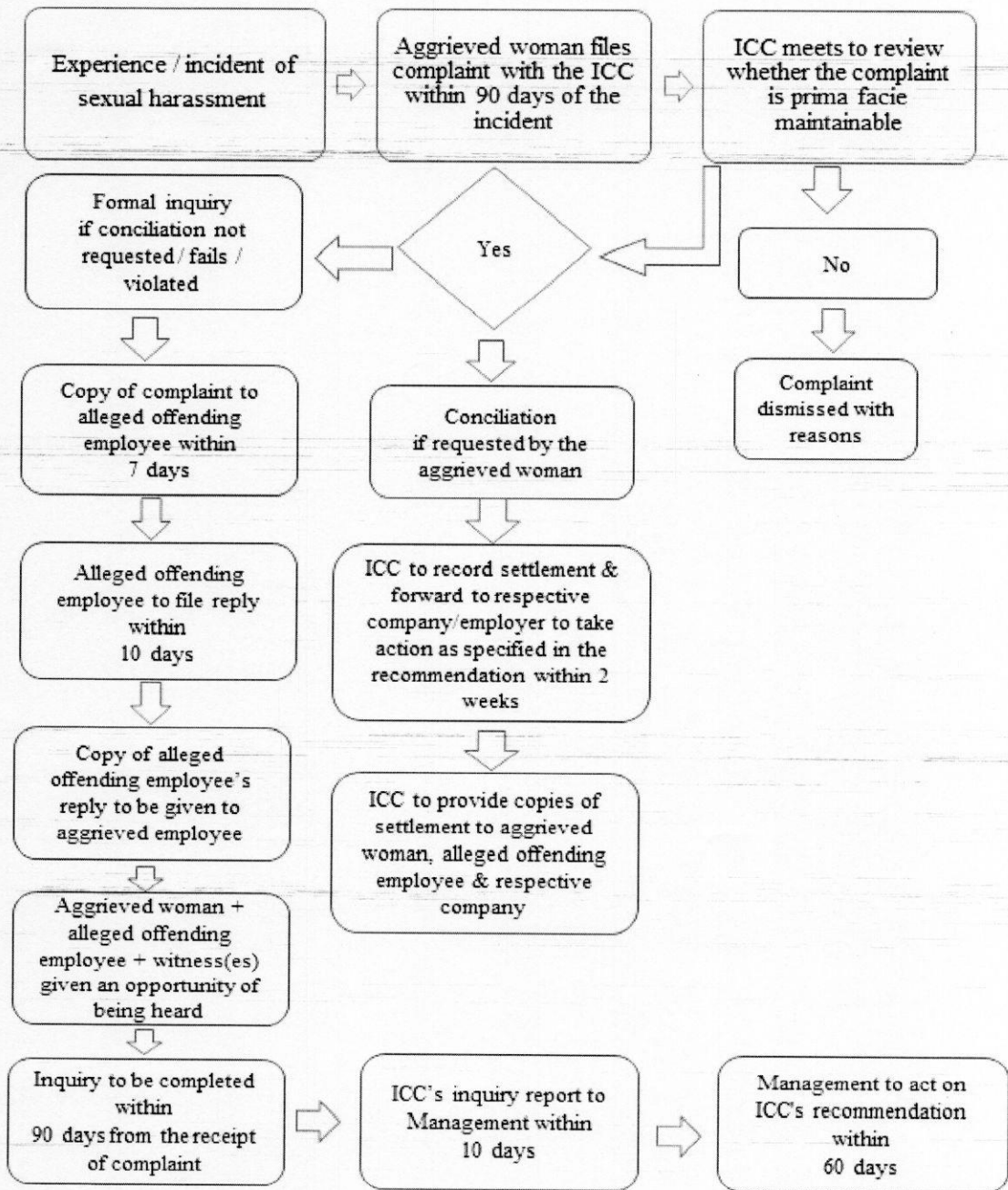
The ICC members' contact details are provided in **Annexure I**. Employees can reach out to them for guidance or complaints.



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14. Process flow for reporting sexual harassment at workplace



Annexure - I : List of Internal complaints committee members

Annexure –II : Specimen letter format for reporting sexual harassment at workplace



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15. Revision History

Sr. No.	Reason for Change	Revision No.	Effective Date
1.	New document	00	