

Human Resource Policy Manual

Section Name:	Code of Conduct	Section No:	V
Policy Name:	Policy on Protection of Women against Sexual harassment at workplace (POSH)	Policy No.	5
Revision Date:	22.01.2026	Pages:	1-7
Revision:	01		

1. Objectives

- i. Privi Speciality Chemicals Limited is committed to providing its employees a 'GREAT PLACE TO WORK' that ensures every employee is treated with dignity, respect and afforded equitable treatment and to create a healthy working environment that enables employees to work without fear of prejudice, gender bias and a harassment free workplace without regard to race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, nationality, ethnic origin or disability. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.
- ii. This policy is meant to educate the employees about what conduct constitutes sexual harassment, the ways and means which we are adopting to prevent occurrence of any such event, and in the unlikely chance of such an occurrence, to enable a fair mechanism for dealing with such conduct.
- iii. The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment. This Policy takes complete cognizance of the latest legislation by the Government of India "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and its rules notification published on December 09, 2013. Each incident of sexual harassment results in the violation of the fundamental rights of Gender Equality and the Right to Life and Liberty. Gender equality includes protection from sexual harassment and right to work with dignity, which is universally recognized as human right.
- iv. The Act provides for protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected or incidental thereto.
- v. At Privi, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders.

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Sr. Vice President – HR	President
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2. Scope

- i. This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company.
- Places visited by the Employee arising out of or during the course of employment including official events, transportation, Accommodation provided by the employer for undertaking such journey.

3. Sexual harassment would mean and include any of the following but not limited to:

- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit;
- Physical contact and advances;
- Demand or request for sexual favours;
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas;
- Verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature;

Note: The Company holds the sole prerogative to decide whether or not to cover an incident within the framework of this policy or provide assistance to the aggrieved as it deems fit.

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4. Internal Complaints Committee

i. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Internal Complaints Committee" has been created in the Company for time - bound redressal of complaints.

ii. The Internal Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment;
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- Discouraging and preventing employment related sexual harassment.

iii. INTERNAL COMPLAINTS COMMITTEE (ICC)

ICC at the Registered Office of PRIVI shall comprise of the following:

- | | |
|------------------------|-------------------------------|
| • Ms. Varsha Motiani | Chairperson/Presiding officer |
| • Adv. Satya Priya Rao | NGO Member |
| • Mr. Ramchandra Surve | Member |
| • Mr. Ramesh Kathuria | Member |
| • Mr. Pramod Nambiar | Member |
| • Ms. Rajni Kharayat | Member |

5. Redressal Process

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under

iv. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the ICC for redressal of their grievances. The ICC will thereafter provide advice

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or extend support as requested and will undertake prompt investigation to resolve the matter.

v. Complaints

An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the ICC constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope.

Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward

1. The Presiding Officer of the ICC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.
2. If the Presiding Officer of the ICC determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the ICC.
 - a. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
 - b. The ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the President / Executive Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. President / Executive Director will ensure corrective action on the recommendations of the ICC and keep the complainant informed of the same.

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Corrective action may include any of the following:

- Formal apology
- Counselling
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Suspension or termination of services of the employee found guilty of the offence

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

Note: Anonymous complaints are generally discouraged as details of people involved are essential to the formal investigation process.

6. Protection against Retaliation:

- Retaliation is a serious violation of this Policy and any person found to have retaliated against an individual for reporting harassment will be subject to appropriate disciplinary procedures.
- PRIVI forbids any form of retaliation against anyone who has reported a suspected case of harassment or has cooperated in any investigation involving a reported case.
- If anyone feels that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings, should report the matter to the ICC.
- As with complaints of harassment, this too will be treated as misconduct and Privi will take appropriate action to prevent/rectify the retaliation.
- Retaliation will be treated as seriously as an alleged case of harassment and will apply even if the original complaint is not proven.

7. Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

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To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

i. Access to Reports and Documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosures required under disciplinary or other remedial processes.

ii. Appeals and Alternate Legal Remedies

- i. An employee who feels that a sexual harassment complaint or a retaliation complaint did not receive prompt and fair response/resolution may contact the Managing Director.
- ii. Additionally, nothing in this policy shall prevent the aggrieved person or the respondent from pursuing formal legal remedies or resolution through Govt. agencies or the courts of law of the country.

iii. Malafide Complaint

- i. If after inquiry, it is found that the complaint was raised with a malafide intent the company can treat the person found guilty of such malafide complaint as a major misconduct and decide on appropriate disciplinary action including termination of services. Lack of evidence to support complaint does not indicate a malafide intention.

ii. Wrongful allegations and breaching confidentiality in this regard will be viewed seriously by the Company.

8. General

- i. All employees at the Company have a responsibility in contributing to a mature and respectful work environment. With this view, the Company shall undertake all reasonable measures to educate its employees on the provisions of the Act and organise regular training and sensitisation sessions about the policy among its employees. The coverage and frequency of these sessions will be as decided by

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the Management of the Company.

ii. All employees are personally responsible for their actions and must ensure that their behaviour does not constitute sexual harassment whether it happens deliberately or otherwise.

iii. The Company reserves the right to modify and amend the provisions of this Policy, so as to comply with applicable legal requirements, internal policies, or with a view to fine tune or alter the provisions of this Policy to the extent deemed necessary by the Company from time to time.

iv. This Policy shall be applicable and will be in addition to and not in derogation of the provisions of any other policy and service rules for the time being in force within the organization.

v. Through various training and awareness sessions the Company will make employees aware of their roles and responsibilities in implementation of this policy.

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