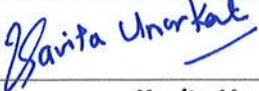
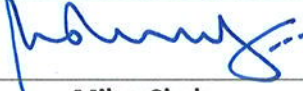
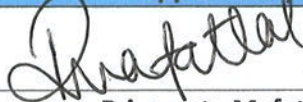


POSH POLICY

(PREVENTION OF SEXUAL HARASSMENT)

Policy No.	Effective From	Review Frequency
MIL/POL/HR/6.0	1 st April 2025	Annually
Prepared By	Reviewed By	Approved By
 Kavita Unarkat General Manager HR	 Milan Shah CHRO	 Priyavrata Mafatlal MD

**Applicability:** All in Mafatlal Industries Ltd**Introduction & Objective:**

Mafatlal Industries Limited (hereinafter referred to as “We”, “Mafatlal” or the “Company”) strives to foster an equal opportunity environment and ensure a workplace free from harassment and gender bias. We are committed to providing a safe, respectful, conducive and inclusive work environment for all employees and workers. This Policy on Prevention of Sexual Harassment (POSH) at Workplace (hereinafter referred to as the “Policy”) has been framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“Act”) and the Vishakha Guidelines laid down by the Hon’ble Supreme Court of India for the prevention of sexual harassment and for the redressal of complaints related to sexual harassment at the workplace.

Scope and Applicability:

This Policy applies to all women employees at the workplace, including permanent, temporary, contractual, trainees, ad-hoc or daily wage basis (either directly or through an agent), with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, and any other persons associated with the Company, across all locations, including offices, factories, and other workplaces.

Definition of Sexual Harassment:

Aggrieved Woman: means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

Respondent: The person against whom the aggrieved woman has made a complain under Section 9 of POSH ACT.

Workplace: Includes premises, locations, establishments, enterprises, institutions, offices, branches, or factory units established, owned, or controlled by the Company. It also extends to any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer for undertaking a journey.

Sexual Harassment: Any unwelcome act or behaviour (whether directly or by implication) such as:

- Physical contact and advances.
- Demand or request for sexual favours.
- Making sexually coloured remarks or remarks of a sexual nature about a person’s body or clothing.
- Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
- Giving gifts of a sexual nature
- Eve-teasing, making sexual innuendos and taunts, or intruding upon a person’s private space
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

The following situations, when related to any sexually motivated act or behaviour, will be considered as instances of sexual harassment:

- a) Offering or implying preferential treatment in employment.
- b) Threatening or implying adverse consequences in employment.
- c) Threatening or implying changes to current or future employment status.
- d) Disrupting a person's work or creating a hostile, intimidating, or offensive work environment.
- e) Subjecting someone to degrading treatment that could harm their health or safety

Internal Complaints Committees (ICCs):

ICC for Offices and Administrative Units:

A Committee has been constituted to address complaints of sexual harassment at the Company's offices and administrative units. The composition of the committee is as follows:

- a) **Ms. Smita Jhanwar** - Chairperson
- a) **Dr. Reena Wani** – Deputy Chairperson (External Committee Member)
- b) **Ms. Kavita Unarkat** - Member
- c) **Mr. Amish Shah** - Member
- d) **Mr. Akash Dhuri** - Member (Effective from 1st August 2024)

Quorum: A minimum of three members are required for the proceedings to take place, including the Chairperson and at least two other members, one of whom must be a woman.

In Case of Removal or Replacement of an ICC Member: If a member of the Internal Complaints Committee (ICC) is removed or replaced due to resignation, transfer, prolonged absence, or any other reason, the Company shall ensure the timely appointment of a suitable replacement to maintain the required composition of the ICC as mandated by law. The replacement shall be formally notified to all stakeholders.

ICC for other units of Mafatlal:

A separate ICC has been constituted for the Company's factory at Nadiad. The composition is as follows:

➤ **ICC for Nadiad**

- i. **Mrs. Pratima Solanki** – Chairperson
- ii. **Dr. Reena Wani** – Deputy Chairperson (External Committee Member)
- iii. **Mrs. Bhavna Rana** – Member
- iv. **Ms. Jayati Barot** – Member
- v. **Mr. Vatsal Sheth** – Member
- vi. **Mr. Ankit Patel** – Member

➤ **ICC for Sangli Unit**

- i. **Mrs. Jyoti Prakash Jadhav**-Chairperson & Presiding Officer
- ii. **Mr. Ganesh B Patil**- External Member
- iii. **Mrs. Chaya Vilas Rajmane** - Member
- iv. **Mr. Ankit Patel**- Member
- v. **Ms. Dipmala Pravin Londe**- Member

In case of any conflict of interest of any ICC member then they should be refrained from being part of the Committee for that specific complaint.

a) Roles and Responsibility of ICCs:

- a) Receive and address complaints of sexual harassment in a timely and confidential manner.
- b) Conduct investigations as per the process laid down under the Act.
- c) Recommend appropriate action based on the findings of the inquiry.
- d) Ensure compliance with the principles of natural justice during proceedings.
- e) Conduct at least one awareness meeting annually to educate employees about the Policy and the redressal mechanism.

b) Complaint Redressal Process:

If the aggrieved woman feels that an incident of sexual harassment is significant enough to require formal action, she should file a written or email complaint, triggering the formal grievance process outlined in this policy. If the complaint is made verbally, the recipient will document it in writing and obtain the complainant's signature. In case aggrieved woman is unable to make a complaint on account of any physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint. The complaint should be submitted promptly after the incident, or in case of series of incidents, within a period of three months from the date of last incident. The ICC may for the reason to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the aggrieved woman unless the complainant provides a valid reason for any delay, as explained hereunder

- a) **Filing a Complaint:** Any aggrieved woman may file a written complaint with the ICC within three months of the incident. Assistance will be provided for drafting the complaint, if required.
- b) **Preliminary Review:** The ICC shall acknowledge receipt of the complaint and conduct a preliminary review to determine its admissibility.
- c) **Inquiry:** A formal inquiry will be initiated, during which both the aggrieved woman and the respondent will be given an opportunity to present their case.
- d) **Action:** Based on the inquiry report, the ICC will recommend appropriate action to the management, which may include warnings, suspension, termination, or other disciplinary measures.
- e) **Confidentiality:** All proceedings, including the identity of the parties, will be kept strictly confidential.
- f) **Interim Reliefs to Complainant (During Pendency of Inquiry):** Upon written request by the complainant, the IC may recommend to the employer:
 - Mandatory leave maximum up to 3 months
 - Any other relief deemed necessary to ensure safety and dignity.

Non-Retaliation:

- a) No personnel who, in good faith, makes a disclosure or lodges a complaint in accordance with this Policy shall be made to suffer reprisal, discrimination or adverse employment consequences.
- b) If any personnel, who makes a disclosure or complaint in good faith, believes that they are being subjected to discrimination, retaliation or harassment for having made a report under this Policy, they must immediately report those facts to their supervisor, manager or the Ethics Committee.
- c) If, for any reason, they do not feel comfortable discussing the matter with these Officials, they should bring the matter to the attention of the External member of POSH Committee. It is imperative that such personnel bring the matter to Mafatlal's attention promptly so that any concerns of can reprisal, be discrimination and or adverse employment and consequences appropriately investigated and addressed promptly.

Document Retention

Mafatlal shall maintain documentation of all complaints or reports, subject to this Policy. The documentation shall inter-alia include any written submissions provided by the complainant, any other Company documents identified in the complaint or by us as relevant to the complaint, a summary of the date and manner in which the complaint was received by Mafatlal and any response by Mafatlal to the conversation.

Training and Awareness:

- Regular training sessions and awareness programs will be conducted to educate employees about their rights and responsibilities under this Policy.
- Special sessions will be organized for ICC members to enhance their understanding of the Act and their role.

Review and Amendments:

This Policy shall be reviewed periodically by the Board of Directors and updated to reflect changes in legislation and organizational needs. Mafatlal retains the right to review and modify/amend this Policy without prior notice to align with the legal and regulatory modifications, and sound business practices. In the event of any change, a revised Policy will capture these modifications, and the effective date of the updated policy will be specified likewise.

Disclosure on Website:

This Policy shall be displayed prominently at all workplaces and communicated to all employees. It will also be available on the Company's Website at <https://www.mafatlals.com/>.