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## **POLICY ON PREVENTION OF SEXUAL HARASSMENT** **(POSH)**

### **THE POLICY STATEMENT**

POLYLINK POLYMERS (INDIA) LIMITED (hereinafter referred as 'Company') is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. Company will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

### **DEFINITION OF SEXUAL HARASSMENT**

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

#### **a. Physical conduct**

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

#### **b. Verbal conduct**

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

**c. Non-verbal conduct**

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser.

The Company recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

The Company recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of the Company, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within the Company premises or outside, including at social events, business trips, training sessions or conferences sponsored by the Company.

## **COMPLAINTS PROCEDURES**

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The Company recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc.

When a designated person receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands the company's procedures for dealing with the complaint

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- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
  - keep a confidential record of all discussions
  - respect the choice of the victim
  - ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework

Throughout the complaints procedure, a victim is entitled to be helped by a counsellor within the company. The Company will nominate a number of counsellors and provide them with special training to enable them to assist victims of sexual harassment. The Company recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. The Company understands the need to support victims in making complaints.

### **INFORMAL COMPLAINTS MECHANISM**

If the victim wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged harasser to respond to the complaint
- ensure that the alleged harasser understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped

### **FORMAL COMPLAINTS MECHANISM**

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal or external investigator or refer it to a committee of three others in accordance with this policy.

- The person carrying out the investigation will:
- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place

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- produce a report detailing the investigations, findings and any recommendations
  - if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
  - follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
  - if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace.
  - keep a record of all actions taken
  - ensure that the all records concerning the matter are kept confidential

## **OUTSIDE COMPLAINTS MECHANISMS**

A person who has been subject to sexual harassment can also make a complaint outside of the Company

### **Sanctions and disciplinary measures**

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable

deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

## **IMPLEMENTATION OF THIS POLICY**

The Company will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

Every year, the Company will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

## **MONITORING AND EVALUATION**

The Company recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

## **APPLICABILITY**

The Prevention of Sexual Harassment (POSH) at workplace Act is applicable to every workplace, establishment, company or organization employing 10 or more employees (full time, part-time, interns or consultants included) irrespective of the location or nature of the industry. It is applicable across India to all establishments, governments and private. Even domestic women workers are also given protection under the purview of this Act.

## **INTERNAL COMPLAINTS COMMITTEE:**

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the company. The detail of the committee is notified to all covered persons at the location (workplace). The committee shall comprise of:

### **Structure and composition of the internal complaint committee:**

#### **a. Pragya Bhartiya- Presiding Officer**

The chairperson of an ICC, referred to by the nomenclature Presiding Officer, shall be a senior level female employee. The legislative intent behind requiring that the ICC be chaired by a woman employed at a senior level was to make the ICC more approachable to women contemplating filing a complaint of sexual harassment, on the premise that women would feel more comfortable with a reporting and redressal mechanism headed by a woman

#### **b. Shruti Tiwari – External Member**

The ICC should include an external member being a person familiar with issues relating to sexual harassment, or from a non-governmental organization or association committed to the cause of women. Inclusion of such

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a third-party member, which incidentally was also mandated by the Supreme Court in the Vishaka Guidelines, has been provided for with a view to inject a degree of objectivity and outside perspective in the working of the ICC.

**c. RP Goyal- Whole Time Director**

The ICC should also include member from its employees, preferably individual having legal knowledge, experience in social work, or committed to the cause of women. Such requirements, while desirable attributes to be borne in mind by employers selecting employee members, were deliberately not made mandatory in order to ease the burden of compliance in forming a committee, given that it may be practically unviable for many organizations to find employees with suitable qualifications. Accordingly, the POSH Act and POSH Rules impose a duty on the employer to organize orientation programmes and training workshops at regular intervals to supplement gaps in the knowledge of members of the ICC and to ensure that they are better placed to duly discharge their duties.

**The committee will be responsible for:**

1. Receiving complaints of sexual harassment at the workplace.
2. Initiating and conducting inquiry as per the established procedure.
3. Submitting findings and recommendations of inquiries.
4. Coordinating with the employer in implementing appropriate action.
5. Maintaining strict confidentiality throughout the process as per established guidelines.
6. Submitting annual reports in the prescribed format.

This policy was last modified on 08<sup>th</sup> August, 2025.