RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY

DEEPAK NITRITE RESPONSIBLE CHEMISTRY

Discrimination and Harassment Policy

OBJECTIVE:

Provide and maintain an equitable, fair, healthy and fear-free business environment, free of discrimination, for all employees, in which all individuals are treated with mutual respect and dignity

COVERAGE & APPLICABILITY:

The scope extends to all employees in DNL employed across all locations in all disciplines and departments:

- All work locations and in any work-related setting outside the workplace, such as business trips and business-related social events.

Guidelines for all Employees on Equal Employment Opportunity and Workplace Harassment

DNL strives to provide and maintain an environment free of discrimination of any kind, based on caste, religion, gender, ancestry, age, disability, marital status, sex, or any other characteristics. In keeping with this commitment, harassment and inappropriate conduct of any form will not be tolerated.

Any employee, found to have violated this policy will be disciplined, up to and including termination of services. Any employee filing a complaint or assisting in the investigation of a complaint is protected from retaliation, coercion, intimidation, interference, and discrimination.

Each employee is required to contribute to a professional atmosphere that promotes equal opportunity and nondiscriminatory practices. Examples of such inappropriate practices include, but are not limited to -

- Sexual Harassment.
- Any other harassment, bias or prejudice on the basis of any characteristic
- Inappropriate conduct that disrupts or interferes with another's work performance or creates an intimidating, offensive, or hostile environment.

On all occasions, employees are required to exhibit, in their conduct and communications, sound judgment and respect for every other employee and all other persons (e.g., vendors, consultants, and clients) with whom the Company has any business transaction.

Employees should refrain from any act that may be construed as insulting, degrading, exploitative or discriminatory treatment, whether use of abusive language or physical, blatant and obvious or even ambiguous.

Similarly, inappropriate conduct directed towards DNL employees by outside vendors, consultants or clients is also unacceptable.

An employee with any questions or concerns regarding this policy should discuss them with the Human Resource Team.

Sexual Harassment

DNL does not tolerate workplace sexual harassment and considers it to be a serious offense. Employees are

prohibited from harassing other employees, vendors or consultants irrespective of the occurrence of the harassment taking place on company premises or outside, during working hours or after official work hours.

Sexual harassment is defined as —

- Unwanted sexual attention of a persistent or offensive nature made by a person who knows, or reasonably should know, that such attention is unwanted.
- It also includes sexually oriented conduct that is sufficiently pervasive or severe to unreasonably interfere with an employee's job performance or create an intimidating, hostile, or offensive work environment. While sexual harassment encompasses a wide range of conduct, some examples of specifically prohibited conduct include (but not limited to):
    - Promising, directly or indirectly, an employee reward, for complying with a sexually oriented request.
    - Threatening, directly or indirectly to retaliate against an employee, if the employee refuses to comply with a sexually oriented request.
    - Denying, directly or indirectly, an employee an employment-related opportunity if the employee refuses to comply with a sexually oriented request.
    - Engaging in sexually suggestive physical contact or touching another employee in a way that is unwelcome.
    - Displaying, storing, or transmitting pornographic or sexually oriented materials using company equipment or facilities.
    - Indecent exposure; or
    - Making sexual or romantic advances toward an employee and persisting despite the employee's rejection of the advances.
    - Comments on the speaker's own sexual abilities or those of co-workers.
    - Obscene teasing, jokes and remarks of a sexual nature.
    - Comments of a sexual nature on, or staring at, an individual's physical attributes.
    - Other harassment of a non-sexual nature that is engaged in due to the gender of the individual.
- Sexual harassment may involve individuals of the same or different gender and is prohibited whether directed toward men or women and regardless of whether the targeted individual accepts or rejects the advances or other offensive behavior.
- Sexual harassment can be physical and/or psychological in nature. A pattern of incidents can constitute sexual harassment even if one of the incidents considered on its own would not be harassing.

Reporting Harassment, Discrimination or Retaliation

Any employee who believes that he/she is being harassed should immediately and directly, notify the offender, that such behavior (verbal or an action) is inappropriate and request that the behavior be stopped, forthwith.

It is also the right and responsibility of each and every employee to bring any inappropriate behavior in the form of unlawful discrimination or harassment of any kind, including Sexual Harassment, to the immediate notice of the Human Resource Representative and/or his reporting Manager/other superiors to help build a

strong and positive environment.

Any employee, who believes that he/she may have been the subject of unlawful discrimination or harassment of any kind, is required to promptly report the matter to the Human Resource Team Member, who will help him/her subsequently file a complaint with the Management.

Once the complaint is filed with the Management, it is the responsibility of the Human Resource Team Member along with two other members of the Senior Management Cadre (the three-member team, should preferably represent both genders. In the event that this is not feasible, it is essential that the Team co-opts another member from the opposite gender) to meet with the complainant and have a detailed discussion to better understand the nature of the issue and completeness.

It is equally important for the team to be thorough to ensure fairness for all concerned. It is critical for the Team to recognize the sensitivity of the issue and maintain a high level of confidentiality while collating the facts of the situation.

Upon completion of this initial discussion with the complainant, the Team should discuss the complaint with both the complainant as well as the "offender". In the event that the complainant is uncomfortable, he/she may be excluded from the meeting and the meeting with the "offender" may be held separately.

A fair chance should be given to both the Parties (The Harassed and the Offender) to put forward their word. After listening to either of the sides and studying the facts, if the decision goes in favor of the harassed employee, an unbiased and fair action should be taken against the Offender.

Consider the severity, frequency and pervasiveness of the conduct when imposing discipline on the harasser. There are several disciplinary options available, including:

- Oral and written warning
- Reprimand
- Suspension
- Probation
- Transfer
- Demotion
- Discharge

In the event that an employee believes he/she has witnessed any form of harassment or any inappropriate behavior, he/she must also notify Human Resource Team Member, who will discuss the same with VP - HR and they will work with the concerned Senior Official towards understanding and resolving the issue.

Similarly, any employee who belongs to the Leadership team or plays a senior role in the Company receives information regarding any form of harassment or discrimination, irrespective of the Company/unit, then, he/she has the responsibility and obligation to report it immediately to Human Resource Representative and a similar process as above is to be followed once the harassment issue is reported within the Organization.

General

- The Company may, notwithstanding the eligibility and terms mentioned above, at its discretion amend, modify or withdraw this policy.
- Any deviation from the provisions made in the clauses mentioned in the policy will require prior approval of the President – HR, Chief Financial Officer, Executive Director and the concerned Managing Director of the Company.
- DNL employees should contact Corporate HR, in case of any clarifications

President – Human Resource
June 15, 2025

Annexure - A

Harassment Investigation Guide

1. Getting the employee to describe the Claim:

- Listen to the Charge. Don't make comments like, 'you're overreacting."
- Acknowledge that bringing harassment compliant is a difficult thing to do.
- Maintain a professional attitude.
- Gather the facts; don't be judgmental
- Ask who, what, when, where why and how. Find out if the employee is afraid of retaliation. How does the employee want the problem resolved?

2. Conducting an investigation of the claim – general rules to follow:

- Investigate immediately. Delaying or extending an investigation can make witness testimony increasingly unreliable.
- Remember that the manner in which the investigation is handled can itself furnish grounds for a hostile environment claim, so carefully document every step.
- Treat all claims seriously – even those that seem frivolous – until you have reason to do otherwise.
- Keep the investigation confidential. Emphasize to those involved that your discussions are not to be shared with unconcerned parties. Warn of possible disciplinary action, if necessary.
- Limit the number of persons who have access to the information. Communicate strictly on a 'need to know' basis.
- Ask questions so that information is not unnecessarily disclosed. For example instead of asking, 'Did you see X touch Y?" ask "Have you seen anyone touch Y at work in a way that made her uncomfortable?" Remember – the purpose of the investigation is to gather facts, not disseminate allegations.
    - If there is more than one allegation, treat each separately
    - To avoid defamation liability, never broadcast the facts of a given situation or the results as an example to others or as a training tool.

3. Interviewing the complainant (can be done when employee first reports charge):

- Get specific details
- Find out whether there was a pattern of previous episodes or similar behaviour toward another employee.
- Get the specific context in which the conduct occurred. Where? What time?
- Determine the effect of the conduct on the complainant. Was it economic, non-economic, and/or psychological?
- Determine the time relationship between the occurrence of the conduct, its effect on the complainant, and the time when the complainant made the report.
- Prepare a detailed chronology.
- Analyze whether there might have been certain events that triggered the complaint, i.e., promotion, pay or transfer denial.
- Determine whether there were any possible motives on the part of the complainant.
- Find out what the complainant wants.

- Explain to the complainant that the charges are serious, that you will conduct a thorough investigation before reaching any conclusion, and that he or she will not be retaliated against for making the complaint.
- Don't make any statements about the accused employee's character, job performance, or family life.

4. Interviewing the accused:

- Obtain a statement from the accused.
- Identify the relationship of the accused to the complainant.
- If the individual was a supervisor, indicate the individual's job title, and determine the individual's specific duties at the time of the alleged harassment.
- Determine whether the accused directed, or had responsibility for the work of the complainant, had authority to recommend employment decisions affecting the complainant.
- You can expect the accused to deny the charges. Observe the reaction. Note whether there is surprise, anger, or disbelief. Describe the details of the allegation and note the areas of disagreement between the testimony of both parties. If the accused denies the allegations, probe further to determine with the accused the background, reasons, and motivation that could possibly trigger the complaint.

5. Interviewing witnesses:

- Obtain statements from any witnesses who support or deny any of the complainant's allegations. Be aware that witnesses are often reluctant to come forward out of fear of reprisal.
- Assure all witnesses that their cooperation is important, that their testimony is confidential and that they will not be retaliated against for testifying.

6. Resolving the complaint:

- Apologize for the incident occurring, if that is appropriate.
- When attempting to remedy the conduct, avoid requiring the claimant to work less desirable hours or in a less desirable location. If you offer to transfer the complainant, try to get the complainant's consent and make sure the transfer position is substantially similar to the complainant's prior position. This helps ensure that the complainant is not being illegally punished for reporting discrimination or harassment.
- When imposing discipline on the accused, any forms of discipline short of discharge should be accompanied by a warning that similar misconduct in the future may result in immediate discharge. If no discipline is imposed, document the reasons why.
- Carefully and fully document the investigation, the discipline imposed, and any remedial steps taken.
- Conduct follow-up interviews with the parties to inform them of the company's actions.

Annexure - B

Sexual Harassment Complaint and Resolution Procedure

COMPLAINT REDRESSAL COMMITTEE

A Committee has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Chairman and Members of the Committee are as follows:

A Complaints Redressal Committee has been formed consisting of the following:

1. A senior woman employee, as Presiding Officer

2. A senior employee from HR Department

3. An employee from Legal Department

4. An outside women, preferably from a Non-Government Organization.

All members are required to be present for the proceedings to take place. The quorum shall include the Chairperson, two members, one of whom shall be a lady.

REDRESSAL PROCESS

Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.

The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.

At the first meeting, the Committee members shall hear the Complainant and record his/her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.

Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/ her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.

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, the same would be dropped after recording the reasons thereof.

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

ENQUIRY PROCESS

The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.

The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.

If the Complainant desires to tender any documents by way of evidence before the Committee, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee he /she shall supply original copies of such documents. Both shall affix his /her signature on the respective documents to certify these to be original copies.

The Committee shall call upon all witnesses mentioned by both the parties.

The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.

The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Vice President – Human Resources. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.

The President – Human Resources will direct appropriate action in accordance with the recommendation proposed by the Committee.

The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

OTHER POINTS TO BE CONSIDERED

The Committee may recommend to the Vice President – Human Resources action which may include transfer or any of the other appropriate disciplinary action.

The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

Where sexual harassment occurs as a result of an act or omission by any third party or outsider, DNL shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Head- HR.

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and the Management, for making a Police Complaint, shall initiate appropriate action.

Complaints made with a malicious intent

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.