RESPONSIBLE CARE®
OUR COMMITMENT TO SUSTAINABILITY

DEEPAK NITRITE RESPONSIBLE CHEMISTRY

Prevention of Sexual Harassment (POSH) Policy

INTRODUCTION:

1. Deepak Nitrite Limited ('DNL' or 'Company') and its subsidiaries provide a safe and secure work environment for women which is free from any form of sexual harassment and where all women employees are treated with dignity and respect.
2. This policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder ('the Act'). The policy covers all the key aspects of the Act.

PURPOSE:

1. To clearly /define DNL's position on the issue of sexual harassment of women at workplace.
2. To prohibit and prevent any kind of sexual harassment of women at all workplaces of DNL and its subsidiaries.
3. To lay down policy for addressing issues related to sexual harassment promptly, confidentially and with sensitivity.
4. To ensure compliance with the Act and DNL's Code of Conduct.

SCOPE:

1. This policy extends to all employees (both on roll and contractual) of DNL and all its subsidiaries and all the visiting women.
2. In case, sexual harassment occurs to a DNL employee as a result of an act by a third party or outsider, while on official duty, DNL will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

DEFINITIONS:

Sexual Harassment: According to Section 2(n) sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), namely:

i. Physical contact or advances, or
ii. A demand or request for sexual favors, or
iii. Making sexually colored remarks, or
iv. Showing pornography, or
v. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature,

PREVENTION OF SEXUAL HARASSMENT:

According to Section 3

1. No woman shall be subjected to sexual harassment at any workplace.
2. The following circumstances, among other circumstances, if it occurs or is present in relation to or

connected with any act or behavior of sexual harassment may amount to sexual harassment

i. implied or explicit promise of preferential treatment in her employment,
ii. implied or explicit threat of detrimental treatment in her employment,
iii. implied or explicit threat about her present or future employment status;
iv. interference with her work or creating an intimidating or offensive or hostile work environment for her, or
v. humiliating treatment likely to affect her health or safety,

Note: In determining 'Unwelcome Acts' whether the behavior or act complained of, is an unwelcome act / or is sexual harassment, one of the factors to be given due weight shall be the subjective perception of the complainant.

WORKPLACE:

1. Any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the
2. Appropriate Government or the local authority or a Government company or a corporation or a co-operative society.
3. Any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainmental, industrial, health services or financial activities including production, supply, sale, distribution or service; hospitals or nursing homes;
4. Any sports institute, stadium, sports complex or competition or games venue. whether residential or not used for training, sports or other activities relating thereto
5. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey
6. A dwelling place or a house;

AGGRIEVED WOMAN:

1. 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
2. All women working or visiting any workplace whether in the capacity of regular, temporary, adhoc, or daily wages basis is protected under the Act.
3. It includes all women whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or otherwise. Their terms of employment can be express or implied.
4. Further, she could be a co-worker, a contract worker, probationer, trainee, apprentice, or called by any other such name. The Act also covers a woman, who is working in a dwelling place or house.

COMPLAINTS COMMITTEE/S:

The Act provides for two kinds of complaints mechanisms, Internal Committee (IC) and Local Committee (LC). All Complaints Committees will have 50 per cent representation of women.

1. **Internal Complaints Committee (ICC): According to Section 4:** DNL is obliged under the act to constitute an ICC through a written order at each location which will manage the process of enquiry and redressal of sexual harassment complaints. The ICC will be composed of the following members:

   a) **Presiding Officer (Chairperson):** A Woman working at a senior level from amongst the employees, if not available then nominated from other office, plant, department, location of the DNL
   b) **Members (Minimum Two):** From amongst employees committed to the cause of women, having legal knowledge, experience in social work
   c) **External Member:** From amongst NGO/associations committed to the cause of women or a person familiar with the issue of Sexual Harassment
   d) Quorum of minimum three members is required to be present for any proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a woman.

The presiding officer and every other member of Internal Complaint Committee shall hold office for such period not exceeding 3 years

2. **Local Committee (LC): According to Section 5:** The District Officer will constitute an LCC in every district so as to enable women in the unorganized sector or small establishments to work in an environment free of sexual harassment. Local complaints of sexual harassment from establishments where ICC has not been constituted due to having less than 10 workers or

HOW TO LODGE A COMPLAINT:

1. An Aggrieved woman may make, in writing, a Complaint of Sexual Harassment at Workplace to the Internal Committee if so constituted, or the Local Committee, in case it is not so constituted within a period of 3 Months from the date of incident and in case of series of incidents, within a period of 3 Months from the date of last incident.
2. Complainant can also raise the complaint through whistle blow mechanism. Complainant can also raise a complaint directly with IC via email or in writing to the Presiding officer or any member of the IC.
3. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint.
4. The complaint must include:
   a) Description of the incident,
   b) date(s),
   c) timings,
   d) Respondents name
   e) Parties working relationship
5. Complaint should be raised within 3 months from date of incident or within 3 months from the date of last incident, in case of a series of incidents.

6. The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated.
7. The Committee shall ensure that a fair and just investigation is undertaken immediately. Both the complainant and the respondent shall be initially questioned separately with a view to ascertain the veracity of their contentions.
8. The complainant and the respondent shall be informed of the outcome of the investigation. The investigation shall be completed in not more than 90 days from receipt of the complaint.

POWERS OF INTERNAL COMPLAINTS COMMITTEE (ICC):

1. Initiate enquiry procedure:
   i. ICC is required to take cognizance of complaint, if the complaint is made within the period of 3 months from date of incidence or from date of last incidence.
   ii. ICC should initiate steps before commencing inquiry to settle the matter between the complainant and respondent through conciliation. However, conciliation on the basis of monetary settlement should not be made.
   iii. Provide copies of the settlement recorded to Ethics Committee (defined by Deepak Nitrite Limited), aggrieved woman/complainant and the respondent to take actions as specified in recommendations.
   iv. ICC will make inquiry into the complaint in accordance with the service rules applicable to the respondent and where no such rule exist, in the manner prescribed under Rule 7 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.
   v. Ensure inquiry is completed within a period of 90 days.
   vi. Provide report on findings within 10 days after the completion of an inquiry to the Ethics Committee.
2. ICC has the power to summon witnesses and call for documents or any information from any employee.
3. If the ICC has reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such documents or information by serving a notice in writing on that person, summoning the person, or calling for such documents or information at such place and within such time as may be specified in the written notice.
4. Where any relevant document or information is recorded or stored by means of a mechanical, electronic or other device, the Committee shall have the power to direct that the same be produced, or that a clear reproduction in writing of the same be produced.
5. Upon production of documents / information called for by it, the Committee shall have the power to:
   i. Make copies of such documents and information or extracts there from,
   ii. Retain such documents and information for such period as may be deemed necessary for purposes of the proceedings before it.
6. IC will support the aggrieved woman in lodging an FIR if she wishes to do so.

PENAL CONSEQUENCES OF SEXUAL HARASSMENT:

1. ICC shall not recommend any action if the allegations are not proved.
2. The employee, against whom the allegation of sexual harassment has been proven, becomes liable to penal actions. ICC may recommend the following:

i. Demand for a written letter of apology,
ii. Warning letter / memo, reprimand or censure,
iii. Withdrawal / withholding of promotion,
iv. Withdrawing the pay rise or increment,
v. Termination from Company's services;
vi. Undergoing counseling session(s),
vii. Carrying out Community Service,
viii. Any other action as per the Company's Service Rules or as the Management may deem appropriate.

3. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

TIMELINES AS PER ACT:

Following timelines have been laid down by the Act:

a) Submission of Complaint: Within 3 months of the last incident
b) Notice to the Respondent: Within 7 days of receiving copy of the complaint
c) Completion of Inquiry: Within 90 days
d) Submission of Report by IC: Within 10 days of completion of the inquiry
e) Implementation of Recommendations: Within 60 days
f) Appeal: Within 90 days of the recommendations

CONFIDENTIALITY:

1. The Act prohibits the publication or making known the contents of a complaint and the inquiry proceedings. Any breach of confidentiality will result in specific legal consequences.
2. The Act prohibits the disclosure of:
   a) Contents of the complaint,
   b) Identity and address of complainant, respondent and witnesses; Information pertaining to
   c) conciliatory/inquiry proceedings or recommendations of the IC,
   d) Action taken by the Company.

PROTECTION AGAINST RETALIATION:

1. Irrespective of the outcome of the complaint made in good faith, the employee lodging the complaint and any person providing information or any witness, will be protected from any form of retaliation.
2. While dealing with complaints of sexual harassment, the IC shall ensure that the Complainant or the witness are not victimized or discriminated against by the accused.
3. Any unwarranted pressures, retaliatory or any other type of unethical behavior from the respondent against the complainant while the investigation is in progress should be reported by the complainant to the Committee as soon as possible.
4. Disciplinary action will be taken by the Committee against any such complaints which are found genuine.

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DUTIES OF EMPLOYER'S ACCORING TO SECTION 19

Head of HR shall be responsible for:

a) Ensure that following are prominently displayed at each location.
b) The names and contact details of ICC members.
c) Penal consequences of Sexual Harassment.
d) Conduct awareness programs and workshops about this policy and also ensure that awareness is imparted during induction training.
e) Maintain records of Sexual Harassment cases and findings of IC.

Note: - Any clarification/ justification regarding the interpretation of this policy shall be done with Corporate HR Head only. Any deviation from this policy shall not be entertained by the Organization.

INTERNAL COMPLAINTS COMMITTEE

Deepak Nitrite Limited ("Company") is committed in creating a healthy working environment that enables its employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity and protection of women against sexual harassment at workplace is given utmost importance.

Pursuant to provisions of Sub-Section (1) of Section 4 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and Company's Policy on Discrimination and Harassment ("Policy"), an Internal Committee comprising of following members is hereby constituted to deal with the complaints of sexual harassment at workplace in accordance with the Act and Policy:

FOR CORPORATE OFFICE - VADODRA

SR. NO.	NAME	CONTACT DETAIL		EMAIL ID
		LANDLINE NO.	MOBILE NO.	
1	MS. SITA MURALIDHARAN (Presiding Officer)	0265-2765403	9904709874	smuralid@godeepak.com
2	MR. NARENDRA RAVAL	0265-2765241	9909522555	nlraval@godeepak.com
3	MR. ARVIND BAJPAI	0265-2765302	9904709815	abajpai@godeepak.com
4	MS. DIPTI AGRAWAL	0265-2765500	7738485450	dcagrawal@godeepak.com
5	MS. SURABHI BHESANIA	0265-2765260	6358882264	skbhesania@godeepak.com
6	DR. JAI PAWAR (External Member)	--	9909984911	jai.pawar@deepakfoundation.org

POSH Email ID: poshvoice@godeepak.com

It is brought to the notice of all concerned that sexual harassment at the workplace is considered by the Company a grave offence and is liable to be punishable. Where the allegations against the respondent in a complaint is proved, the Company shall, on the recommendations of the Internal Committee:

a) Take action for sexual harassment as a misconduct in such manner as may be prescribed under the Act.
b) Deduct, from the salary or wages of the respondent such sum as may considered appropriate to be paid to the aggrieved woman or to her legal heirs, as the Internal Committee may determine in accordance with the provisions of the Act.
c) Take such other action as the Company deems necessary.

President – Human Resource
June 15, 2025