



VINATI ORGANICS LIMITED

POLICY AGAINST SEXUAL HARRASMENT AT WORKPLACE

For Vinati Organics Group

Introduction

This policy has been introduced in line with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and its associated rules notified by the Government of India.

This policy is applicable to all employees of the Vinati Organics Group, which includes **Vinati Organics Limited, Veeral Organics Private Limited, Suchir Chemicals Private Limited, Viral Alkalies Limited, and Nishit Pharma Chemical Private Limited**, as well as its parent, subsidiaries, affiliates, successors, assigns, or any other company under common control; hereinafter referred to collectively as the **“Vinati Organics Group”** in this document.

Objective: The objective of this policy is to provide a safe, secure, and respectful work environment for all employees, particularly women, across the Vinati Organics Group. It aims to prevent, prohibit, and address incidents of sexual harassment at the workplace, ensure fair procedures for the resolution and redressal of complaints, and foster a culture of awareness, sensitivity, and equality. The Company reiterates its commitment to upholding the dignity of all individuals and maintaining a workplace free from harassment, bias, and discrimination.

Scope:

This policy applies to:

- All employees of the Company, including permanent, temporary, probationary, trainees, interns, contractual staff, and consultants.
- All workplaces under the control of the Company – including head offices, factories/plants, project sites, regional offices, client locations, and during work-related travel or events.

Workplace includes (but is not limited to):

- Offices, manufacturing units, canteens, training centers, or any other location under the business control of the Company.
- Off-site work events, conferences, seminars, or business meetings.
- Social gatherings organized or attended in an official capacity.
- Any digital or virtual work-related environment.



Definition of Sexual Harassment

Sexual harassment includes any unwelcome sexually determined behavior, whether directly or by implication, such as:

- Physical contact and advances.
- Demand or request for sexual favors.
- Making sexually colored remarks.
- Showing pornography or sexually explicit content.
- Any other unwelcome physical, verbal, non-verbal, or written conduct of a sexual nature.

Sexual harassment may occur in person or through electronic communication (emails, chats, calls, text messages, social media, etc.).

Internal Committee (IC)

In accordance with the Act, the Company has constituted **Internal Committees (IC)** at each location to address complaints of sexual harassment.

Each Internal Committee will consist of:

- A **Presiding Officer** (a senior woman employee),
- At least **two employee members** with demonstrated sensitivity and commitment to the cause,
- One **external member** from an NGO or association committed to the cause of women.

Details of the members and their contact information shall be displayed prominently at each location.

Roles and Responsibilities of the Internal Committee:

The IC shall:

- Receive complaints of sexual harassment.
- Conduct a fair and impartial inquiry as per principles of natural justice.
- Submit its findings and recommendations to the employer within **90 days** of receiving the complaint.
- Recommend action based on its findings.
- Maintain confidentiality of the proceedings.

Complaint Mechanism:

A. Informal Resolution (Optional)

The complainant may choose to directly communicate their discomfort to the alleged offender. If uncomfortable, or if the behavior persists, the complainant is encouraged to approach the Internal Committee.

B. Formal Complaint Process

- A complaint must be submitted **in writing** (including via email) to the Presiding Officer of the IC within **3 months** of the incident.
- The IC may allow an extension of up to 3 more months, if sufficient reasons are provided.
- Complaints must include the name, designation, department, and contact details of the complainant, along with the incident details like date, place, evidence, and names of witnesses, if any (Annexure 1: POSH Complaint Form Template)



Inquiry Process:

- Upon receiving a complaint, the IC will issue a notice to the respondent within **7 days**.
- Both parties will be given the opportunity to be heard.
- The IC may examine documents, witnesses, and any other evidence relevant to the case.
- The inquiry shall be completed within **90 days**, and the final report shall be submitted to the employer within **10 days** thereafter.

Action on Inquiry Findings:

If the IC finds the respondent guilty, the Company may take actions such as:

- Written apology.
- Warning or reprimand.
- Withholding of promotion/increment.
- Suspension or termination.
- Any other disciplinary action under applicable policies.

If the complaint is found to be malicious or knowingly false, the IC may recommend suitable action against the complainant.

Confidentiality: All proceedings, records, and identities related to a complaint shall be kept confidential and disclosed only to those involved in the process or as mandated by law.

Protection from Retaliation: The Company ensures that complainants, witnesses, and IC members are protected against victimization or retaliation. Any such acts will invite disciplinary action.

Awareness and Training:

- The Company shall conduct regular POSH awareness sessions for all employees.
- IC members shall undergo periodic capacity-building trainings.
- Information about the policy and IC members will be displayed prominently at all locations and included in induction programs.

Applicability to All Genders

While this policy is in accordance with the Act which protects women, Vinati Organics Group affirms that sexual harassment of any employee—regardless of gender—is unacceptable, and appropriate action shall be taken in all such cases.

Conclusion: Vinati Organics Group is fully committed to a work environment that upholds the dignity and rights of every employee. Zero tolerance towards any form of sexual harassment is a non-negotiable principle of our workplace culture.

Vinati Saraf Mutreja
Managing Director & CEO

Reena Wadkar
Vice President – Human Resources



Annexure 1: POSH Complaint Form Template

Internal Complaint Form for Reporting Sexual Harassment (To be submitted to the Presiding Officer of the Internal Committee)

Complainant's Full Name:	
Employee Code (if applicable)	
Designation	
Department	
Location / Site	
Contact Number	
Email ID	
Name of the Respondent (Accused)	
Designation / Department of Respondent	
Date(s) of Incident(s)	
Time(s) of Incident(s)	
Location of Incident(s)	
Detailed Description of the Incident(s) (Please mention all relevant details. Attach extra sheets if needed.)	
List of Witnesses (if any) (Name, Designation, Contact details)	
Evidence Attached (if any) (Documents, screenshots, messages, etc.)	

Preferred Mode of Resolution: ☐ Informal ☐ Formal Inquiry

Declaration:

I declare that the information provided above is true to the best of my knowledge and belief. I understand that false or malicious complaints may invite disciplinary action.

Signature of Complainant:

Date of Submission: