

NACL Industries Limited

Prevention of Sexual Harassment Policy

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1) Objective

The objective of this policy is to create a healthy working environment for both genders by establishing guidelines to deter any sexual harassment, define the redressal mechanism for raising concerns, investigation and action on the findings of the investigation by Internal Committee.

2) Scope

This policy is applicable across all business locations of NACL Industries Limited within India.

3) Performance Measure

Performance Measure	Unit of measure
Time taken to respond, investigate and closure of investigation	90 Days

4) Deployment

4.1 What:

Promoting professional behavior and respectful treatment of all employees and providing an effective redressal system for sexual harassment complaints.

4.2 Why:

The aim of this process is to ensure a free, fair gender neutral and harassment-free workplace environment for all employees.

4.3 Where:

Across all Business Locations of NACL Industries Limited in the country.

4.4 Who:

Location HRs in consultation with SBU HR Head.

4.5 How:

By encouraging the demonstration of respectful treatment of all employees, responding to repartees and institutionalizing the redressal mechanism.

5) Constitution of Internal Committee

5.1 List of Internal Committee (IC) chairperson and members, External Committee member, along with Location SPOCs is provided in Annexure- II.

5.2 It shall have a Presiding Officer who shall be a woman employed at a senior level at a workplace from amongst the employees.

5.3 It shall have not less than two members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.

Prevention of Sexual Harassment Policy

- 5.4 It shall include a 3rd party representative, a woman from an NGO or other agency committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- 5.5 It shall have at least 50% women members.

6) Awareness of the Policy

- 6.1 The contents of this policy shall be made public to all existing employees.
- 6.2 A gender sensitivity training / workshop shall be periodically (once in every two years) organized for all employees.
- 6.3 Policy handout to be provided to all new hires (irrespective of grade) at the time of joining. The sensitization of policy to be covered during the induction.
- 6.4 A special emphasis to educate all new employees on the policy shall be made by including it in the Induction Program (CIRCUIT) by the Human Resources department.

7) Definition

7.1	Sexual Harassment	<p>The Law explicitly defined sexual harassment as an-unwelcome sexual gesture or behaviour aimed or having a tendency to outrage the modesty of woman directly or indirectly.</p> <p>Unwelcome sexual advances</p> <p>Requests for sexual favours</p> <p>Physical Harassment</p> <p>Verbal Harassment</p> <p>Gesture Harassment</p> <p>Any other physical, verbal or non-verbal conduct of sexual nature</p>
7.2	Complainant	The person reporting an incident of Sexual Harassment of self or another colleague(s).
7.3	Respondent	The person who is alleged / reported to have committed an act of Sexual Harassment.

Prevention of Sexual Harassment Policy

7.4	Workplace	Any department, organisation, undertaking, establishment, enterprise, office, branch or plant unit which is established, owned, controlled wholly or substantially financed by funds provided directly or indirectly. 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.
7.5	Employee	A person employed at a workplace for any work on regular, temporary, adhoc or daily wage basis either directly or through an agent including a contractor, with or, without the knowledge of principal employer, whether for remuneration or not, working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co- worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

8) Roles & Responsibilities

8.1	Employees	<p>Refrain from committing acts amounting to sexual harassment.</p> <p>Report incidents of sexual harassment without fear.</p> <p>Respect employees (Ref. 7.5) and any other third party in the same way that we want to be respected.</p>
8.2	Manager/Superior	<p>Maintain an open door for repartees.</p> <p>Keep his or her eyes open for inappropriate conduct or comments.</p> <p>Encourage employees to report any gender-based harassment concerns to him or her, or the Human Resources Department.</p> <p>Be responsive to employee complaints about gender- based harassment or other unwelcome and offensive conduct.</p> <p>Demonstrate, demand and promote professional behavior and respectful treatment of all employees.</p>
8.3	Human Resource Department	<p>Overall process and policy ownership.</p> <p>Ensure the policy is communicated to all existing employees as well as new joinees.</p> <p>Conduct POSH sensitization workshops along with the Chairperson of IC.</p>

Prevention of Sexual Harassment Policy

8.4	Location SPOCs	Ensure the policy is communicated to all existing employees as well as new joinees. On receipt of complaint, if any, will forward to Internal Committee
8.5	Internal Committee	The committee shall be responsible for conducting enquiries and dealing with the situation appropriately. Maintain confidentiality. Should view the case from a neutral perspective. Maintain documentation on case records with full confidentiality
8.6	CHRO	Take disciplinary actions as recommended by IC.

9) Reporting Sexual Harassment

9.1 Don't Ignore Offensive Behavior

As a rule, ignoring offensive behavior is not an effective way of changing that behavior. Sometimes it may make sense to ignore an incident once or twice, especially if one thinks there has been a misunderstanding on the basis of different cultural expectations, for example. However, people at NACL Industries Limited are expected to conform to NACL Industries Limited rules irrespective of their cultural background. Ignoring offensive behavior is especially discouraged in circumstances where one cannot avoid contact with the person and still feels harassed.

9.2 Write About It

If an employee is a witness to or is subjected to an act of sexual harassment at the workplace affecting oneself or others must be reported immediately to the Internal Committee.

9.3 Talk About It

If an employee believes that he or she has been harassed, the employee should tell a responsible discreet colleague, superior, senior management member or a person from the Human Resources department. The facts and how the employee feels about them should be discussed. When an employee witnesses an incident that is offensive or makes someone feel uncomfortable, s/he should express disapproval even if the conduct does not concern the employee.

10) Responding to Repartees

If employee expresses concern about unwelcome conduct, it must be responded rapidly by following the steps below:

Prevention of Sexual Harassment Policy

- 10.1 Set aside a private place and sufficient time to listen to the employees.
- 10.2 Reassure the employee, the matter shall be handled confidentially.
- 10.3 Take all complaints seriously.
- 10.4 Reassure the employee that NACL does not tolerate retaliation against those who file complaints.
- 10.5 Listen actively.
- 10.6 Ask the employee to describe the unwelcome conduct. Encourage him or her to provide details on who, what, when, where and how often the conduct occurred.
- 10.7 Ask for any written materials.
- 10.8 Ask for the names of any witnesses.
- 10.9 Be neutral as he or she talks.
- 10.10 Do not assume the complaining employee's story lacks merit.
- 10.11 Do not assume the alleged harasser is guilty.
- 10.12 Do not blame the employee for the conduct that occurred or ask what he or she did to encourage it.
- 10.13 Take notes of the facts as recited by the victim. Do not write statements that interpret the facts or evaluate the seriousness of the conduct alleged. The note should be dated.
- 10.14 At the end of the meeting, ask the employee how he/she would like the matter resolved.
- 10.15 Let the employee know that the matter should be reported to the Internal Committee to take it forward.

11) Third Party Employee Harassment

Any act of sexual harassment by any vendor, repair person or contract worker or outsider, please report this to a superior or to the concerned HR for the Plants/Unit or the SBU HR Head. NACL shall take all the steps necessary to protect the affected person in terms of support and preventive action.

12) Redressal Mechanism

Please refer to Annexure-1 for Redressal Mechanism.

12.1 Complaint Procedure

All the complaints shall be forwarded to the Internal Committee in the format attached (Annexure I) in six copies.

12.2 Investigation Procedure

- When a Sexual Harassment complaint is received the Internal Committee shall send one copy of the complaint to the respondent within 7 working days.
- The respondent is required to reply to the complaint within 10 working days on receipt of the complaint.
- The individual(s) named in the complaint shall not be involved in

Prevention of Sexual Harassment Policy

conducting or supervising the investigation.

- Investigations shall be thoroughly documented.
- The Internal Committee shall investigate the facts and circumstances surrounding any incident and prepare a report which shall also include any recommendations for follow-up action.
- The recommendation shall be communicated by the Committee to NACL. HR shall take necessary action as per the recommendations and in accordance with the policies of the NACL. Thereafter HR shall update the Committee on the action taken. The Committee shall update the victims.

13) Disciplinary Action

13.1 Depending on the circumstances, disciplinary action imposed on an employee found to have committed sexual harassment may include one or a combination of the following. The communication shall be issued by the HR department.

- Counseling by the location specific SBU HR and Head of the Department.
- A verbal or written reprimand signed by CHRO.
- Probation Extension.
- Suspension.
- Termination from employment and /or any other form of appropriate corrective action.
- The victim of sexual harassment shall have the option to request the transfer of the perpetrator or his or her own transfer.

13.2 False or Malicious Complaint: If the investigations reveal that the complainant had raised the concern with hidden / motives, the CHRO may initiate appropriate disciplinary action, while ensuring that others are not deterred from raising concerns in future.

14) Retaliation Prohibited

14.1 NACL shall not tolerate any form of retaliation (direct or indirect) against any person who complains about sexual harassment.

14.2 Workplace retaliation occurs when a supervisor or employee punishes another by reducing their pay, transferring them to a less favorable position, tries to fire them, gives them no work or excessive work, or gives them less favorable hours because they have filed or assisted in making a sexual harassment complaint.

14.3 Employees who give information about a complaint or participate in sexual harassment investigations are also protected from any workplace reprisal.

Prevention of Sexual Harassment Policy

- 14.4 Any employee who tries to retaliate against another shall be subject to disciplinary action. Disciplinary action can range from a reprimand to termination from employment and dealt with by the Company at its discretion.
- 14.5 Retaliation against any member of the Internal Committee is also prohibited.

15) Guidelines

15.1 Confidentiality

- When an employee approaches another employee about a harassment concern, the employee should be advised that the matter be kept confidential. It must be explained by the person he or she speaks to that "confidentiality" means that the employee should not discuss the matter with others inside or outside of NACL
- Charges of harassment shall be kept as confidential as possible. They shall only be disclosed on a strictly "need-to-know" basis who may be required in the investigation process.

15.2 Complaints investigated shall include a private and confidential interview with:

- The person(s) filing the complaints.
- The person or persons alleged to have committed the harassment.
- Any witnesses with relevant information.

15.3 All the people interviewed in the investigation shall be asked to keep the matter confidential.

15.4 **Requests to Keep Complaints "Off the Record"**- If an employee asks that his or her complaint be kept "off the record,"- or asks the person he or she is complaining to, not to tell anyone, it must be explained that this cannot be done. It should be explained that NACL is obliged to inquire into harassment complaints and that one is responsible for reporting known or suspected complaints of harassment.

15.5 **Termination of Investigation:** The Internal Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the complaint, if the complainant or the respondent fails, without sufficient cause, to present herself or himself for three consecutive hearings convened by the chairperson or presiding officer, as the case may be: Provided that such a termination or ex-parte order may not be passed without giving a notice in writing fifteen days in advance, to the party concerned.

15.6 The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceeding before the Internal Committee.

15.7 In conducting the inquiry, a minimum of 3 members of the Internal Committee, including the presiding officer or the chairperson as the case may be, shall be present.

Prevention of Sexual Harassment Policy

16) Assessment and Review

This policy shall be reviewed once in three years or as and when there are changes in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and rules made there under, in consultation with CHRO.

17) Frequently Asked Questions about Sexual Harassment

17.1 **Can both superiors, subordinates and co-workers be harassers?**

Yes. Superiors can harass their subordinates and can be vice versa. There is a possibility that even co-workers can also speak or act in ways that create a hostile work environment for their fellow workers.

17.2 **What about bystanders?**

If two or more employees engage in sexual or other behavior that makes a third party uncomfortable, threatened or intimidated, is this gender-based harassment?

Yes. Even conduct not directed at third parties can amount to gender-based harassment if it interferes with their work or makes the workplace intimidating. It does not matter that the two employees are willingly engaged in the behavior that offends the third party.

17.3 **Whose perspective matters?**

If the victim reasonably finds unwelcome words or conducts offensive that is what counts. It doesn't matter if the harasser thinks the words or conduct are funny or inoffensive. It also doesn't matter that the harasser didn't intend to upset anyone.

17.4 **What if someone files charges that turn out not to be true?**

Sometimes an employee should complain about conduct they think is harassment or discrimination, but an investigation shows they were mistaken. A finding that harassment did not occur, or that insufficient evidence existed to support a complaint does not necessarily mean that the charge was intentionally false.

If an employee reasonably believes that the conduct they complain of amounts to harassment, this is not an intentional false charge. Employees who intentionally make false charges of harassment, however, shall be subject to disciplinary action.

17.5 **Is the organization responsible in case the incident happens outside the office?**

The workplace has been broadly defined and it includes any place visited by the employee arising out of or during the course of employment including transportation by the employer.

Prevention of Sexual Harassment Policy

Annexure I (6 Copies)

To
Chairperson
Internal Committee

Date:

Sub: Complaint related to sexual harassment at workplace

From/On behalf of:

Name of the affected employee		Date & time of incident	
Employee No.		Designation	
Phone No			
Exact nature of incident/ occurrence: (Please enclose separate sheet, if required)			

Name of the offender		Employee No.	
Designation		Phone No	
Other details (in case of unknown offender/stranger etc.)			

Name, Address & Signature of witness(es), (if any)

Signature of the Employee

Name

Employee No.

Designation

Department/ Location

Contact No.

Prevention of Sexual Harassment Policy

Annexure II

External Committee Member:

Ms. B. Saroj: Lawyer

Internal Committee Members:

S.No	Emp ID	Names	Position	Designation	Location
1				Chairperson	
2				IC Member	
3				IC Member	
4				IC Member	

Location SPOCs:

S. No	Emp ID	Names	Position	Location
1				
2				
3				
4				
5				
6				
7				

Note:

- Employees are advised to directly reach out to IC members for reporting any POSH complaints
- Employees can approach Location SPOCs if required. In case of locations not covered in the above list, employee can directly approach the Internal Committee Members.
- In case of any transfers/ employee movements of Location SPOCs in the course of the policy term, Location HRs will act as interim Location SPOCs.

Prevention of Sexual Harassment Policy

**Annexure III
Redressal Mechanism**

****** This policy was last modified on 24th October 2025 ******