RP - Sanjiv Goenka Group
Growing Legacies

AQUAPHARM

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

REVISION HISTORY:

Sr No	Rev no	Rev Date	Revision Details	Prepared by	Approved by
1	00	01.01.2023	Initial release	Manali M	Shailes D
2	01	01.09.2024	Overall Changes in the Policy	Manali M	Shailesh D
3	02	24.09.2026	Changes in Policy	Vikrant K	Shailesh D

PREAMBLE

This Policy is designed for the Aquapharm Chemical Limited and all the component entities of The Group. All the entities Under the Aquapharm Chemical Limited will be guided by this Policy. The group entities may incorporate any additional requirements wherever necessary along with this Policy. The term "Company" can be interchangeably used for The Aquapharm Chemical Limited and its component entities. Accordingly, the reference of the employee of the company in this Policy shall also include the employees of the Aquapharm Chemical Limited and any of its component entities.

PHILOSOPHY

Aquapharm Chemical Limited a professionally managed organization and the core value underlying the corporate philosophy is to provide a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. For this it is important to have a Prevention of Sexual Harassment Policy. The company also believes that all employees of the company have to be treated with dignity. Any sexual harassment at the workplace or other than workplace if involving employees is a grave offence and is, therefore, punishable. Aquapharm Chemical Limited has Zero Tolerance to any form of harassment especially if it is sexual in nature.

OBJECTIVE

As per the Global Ethics Policy Company's approach is to spread awareness, thereby putting a stop to sexual harassment ("SH") at the workplace and in the event of occurrence of any such incident, enforce strict action against the perpetrator.

It is the duty of the Company to deter acts of sexual harassment and provide a procedure for resolution, settlement or prosecution of acts of sexual harassment; Where the action or omission of the employee amounts to misconduct under the policies and guidelines of the Company, the Company shall initiate a reformative action against him/her; Where the aggrieved employee is not satisfied with the reformatory actions taken by the Company and desires to institute the offence under the local regulatory regime or any other law, the Prevention of Sexual Harassment ("POSH") Committee ("POSH Committee") of the Company can aid the aggrieved employee in initiating action with relevant authorities.

SCOPE & APPLICABILITY

This policy applies to Complaints of Sexual Harassment by an employee or third party who is associated with the company in any form at its Workplace, regardless of whether the alleged incident (s) or offence (s) has/have occurred in or outside the Company's office premises

The provisions of the policy cover and must be complied with all employees whether on rolls or contractual, trainees, consultants, contractors, vendors, visitors and stakeholders on the premises including plants.

DEFINITIONS

Sexual Harassment by any employee in the work place, which may lead to preferential treatment,

detrimental treatment, intimidating or offensive work environment or humiliating conduct, has been defined as including "unwelcome" sexually determined behaviour (whether directly or by implication) such as:

- physical contact and advances;
- a demand or request for sexual favours;
- making sexually coloured remarks;
- showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
- Digital harassment, including sending communications using online platforms such as sexually coloured remarks, remarks on personal appearances, gender preference, etc.; and
- Cyber-stalking through virtual communication platforms.

The following circumstances, amongst other circumstances if present in relation to or connected with any act or behaviour of sexual harassment may amount to SH:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment
- Humiliating treatment likely to affect health or safety
- It is to be noted, this is not a comprehensive list and is only indicative.

Note that the Act has already defined "sexual harassment" by focusing on the impact of an act on an aggrieved person, rather than the intent of the aggressor. Hence, unwelcome acts can happen through any medium, online or in person, and continues to be relevant as employees work from home.

IN THIS POLICY

'Aggrieved employee' in relation to the workplace means the person, of any age, who alleges to have been subjected to any act of SH by another employee.

'Complainant' means an Aggrieved employee who submits a written complaint of SH at workplace to the POSH Committee.

'Respondent' means a person against whom the Complainant has made her/his complaint (who may or may not be an employee of the Company).

'Employee' means a person employed at or affiliated with the Company or its affiliates, for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or 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, intern, apprentice or called by any other such name.

'Workplace' means the Company and its affiliates and any place visited by the Employee arising out of or during the course of employment including transportation provided by the Company for official or statutory purposes, any social, business or other functions organized by the Company and also applies to the virtual/online workplace when Employees are working from home.

COMPLAINTS PROCEDURE (AS PER CHAPTER IV OF THE ACT)

If an employee experiences or witnesses SH in the workplace, he/she can complain in writing to:

- Any member of the POSH Committee. For a list and contact details of the members, please refer to the table below in ANNEXURE I.
- Any member of the Human Resources ("HR") team.
- Complaint can be raised by filling "POSH COMPLAINT FORM" on Sharepoint.
- If the complaint is against any member of the Internal Complaints Committee (ICC) Or Posh Committee, the aggrieved employee can reach out to the President – Corporate HR of Aquapharm Chemical Limited.

An Aggrieved employee can make a complaint to the POSH Committee in writing within a period of three (3) months from the date of an incident and in case of a series of incidents, within a period of three (3) months from the date of the last incident. Complaints can be sent via email, with a secure password to any of the above listed emails.

The POSH Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months (90 days), if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the aforesaid period.

In case the Aggrieved employee cannot lodge the complaint in writing, the Presiding Officer or any member of the POSH Committee will render all reasonable assistance to the Aggrieved employee for making the complaint in writing. In case the Aggrieved employee is unable to make the complaint on his/ her own for any reason, the complaint can be made on his/ her behalf by their legal heir or any such person as may be prescribed in case of mental or physical incapacity or death of the Aggrieved employee.

The POSH Committee may, before initiating an inquiry and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. If conciliation is not a chosen option by the parties, then on receiving a complaint, the POSH Committee has to immediately inform the convener of the POSH Committee about the details of the complaint received. An inquiry quorum needs to be formed before starting a formal inquiry.

INTERNAL COMPLAINTS COMMITTEE(ICC) OR POSH COMMITTEE

As required under the Act, an Internal Complaints Committee has been constituted with immediate effect. That will investigate all complaints of sexual harassment.

There will be a five-member committee. The committee will consist of three female employees and two male employees. The committee will be headed by a female employee as Presiding Officer. The members of the ICC shall hold office for a period of three years and the company will nominate

another person to replace a member who vacates office for any reason including resignation from the company's service. A minimum of three (3) members, including the Presiding Officer or the Chairperson are required to form the quorum for any inquiry.

COMPLAINTS PROCEDURE (AS PER CHAPTER IV OF THE ACT)

Name	Designation	Contact Number	Email ID
Dr. Madhuri Phadke	Chairperson	8799957019	phadke.madhuri@aquapharm.net
Adv. Darshana Sawant	External Member	9011075672	dmclegal1@gmail.com
Mr. Sharad Potghan	Member	9607981157	potghan.sharad@aquapharm.net
Mr. Sanjay Jadhav	Member	9860990014	jadhav.s@aquapharm.net
Mrs. Anita Shinde	Member	9881853456	shinde.a@aquapharm.net

CONCILIATION (AS PER CHAPTER IV OF THE ACT)

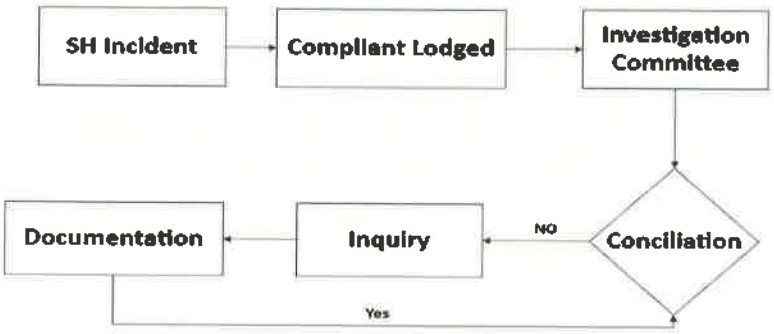
The POSH Committee may, before initiating an inquiry, and at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation. Where a settlement is arrived at, no further inquiry shall be conducted by POSH Committee. In the absence of conciliation or non-compliance of the process by the Respondent or the parties involved, the POSH Committee, whether through the Complainant or at its own discretion, in consultation with POSH Committee, shall constitute an inquiry quorum to inquire into the complaint and prepare a report at the end of the inquiry. Where a settlement has been arrived at, the POSH Committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation.

INQUIRY INTO THE COMPLAINT

- At the time of filing the complaint, the Complainant will submit to the POSH Committee, six (6) copies of the complaint along with supporting documents and the names and address of witnesses, if any. Copies are not required when sending the complaint through email. For complaints received via email, the POSH Committee and HR may call the Complainant to verify that the complaint was sent by them, and to seek any further details regarding the complaint.
- On receipt of the complaint, the Committee will hold a meeting with the complainant within 72 hours of receipt of the complaint but no later than one week in any case. The POSH Committee will send one of the copies received from the Complainant, to the Respondent within seven (7) working days. In case of complaints received online/email, the same will be forwarded by email to the Respondent within seven (7) working days.
- The Respondent will file/email the reply to the complaint along with his/ her list of documents, names and addresses of witnesses, if any, within ten (10) working days from the date of receipt of complaint.
- The POSH Committee will proceed to make the inquiry as per the Company policies applicable to the Employees.
- The POSH Committee, for the purpose of its inquiry, is empowered to require the discovery and production of all forms of evidence, including access to written communication and documents, summoning and enforcing the attendance of witnesses. The entire proceeding should be recorded vividly.

- In accordance with the rules of natural justice and equity, during the course of inquiry, both parties will be given a fair opportunity of being heard.
- The POSH Committee shall not allow either party to bring in any legal practitioner to represent them in their case at any stage of the inquiry proceedings before the POSH Committee.
- During the inquiry, at the written request of the Complainant, the POSH Committee may recommend interim relief by transferring the Complainant or the Respondent to another location/ department or granting the Complainant leave up to three (3) months. Such leave, if granted, should be over and above the existing leave balance.
- The POSH Committee shall have the right to close the inquiry proceedings or to give an ex-parte decision on the complaint, if the Complainant or Respondent fails (without sufficient cause) to present herself or himself for three (3) consecutive hearings convened by the Presiding Officer. However, such a decision will not be taken unless the concerned party is given fifteen (15) days' written notice before the case is closed.
- After hearing all parties involved in the incident, the POSH Committee will prepare a case report, in writing, outlining the case, the inquiry and suggest the reformative action to be initiated. This report needs to be submitted to the President - Group Corporate HR within ten (10) days from the date of completion of the inquiry. Further, the report needs to be made available to the concerned parties
- The inquiry report and case closure recommendation have to be signed off by the Presiding Officer of the POSH Committee.
- Withdrawal of the complaint at any stage of the proceedings does not preclude the POSH Committee from proceeding with the inquiry where there is obvious truth or merit to the allegations in the complaint or where there is documentary or direct evidence that can prove the guilt of the Respondent.
- All cases need to be closed within a period of ninety (90) days from the date of the formal receipt of the complaint.
- To the extent possible, the identity of the Complainant, witnesses and the Respondent will be protected against unnecessary disclosure. All efforts shall be made to ensure that all proceedings remain confidential. The Company may initiate disciplinary action against anyone and/ or impose a monetary penalty if found guilty of contravening the provisions pertaining to confidentiality as detailed out in section 16 of the Act.
- In a situation where work from home is applicable or it is not possible to conduct in- person inquiry, the POSH Committee will conduct all its proceedings virtually, using secure online tools. The Company will make all reasonable efforts to maintain data security and confidentiality of all information shared during the inquiry, provided however, disclosures will be made on a need-to-know basis and for regulatory reasons.
- All Employees (Complainants, Respondents, witnesses, or any others) are expected to cooperate fully in the inquiries conducted through online means, including ensuring privacy during the interview, maintaining the security of the platform (not sharing the username/password/meeting ID, screenshots, etc.). Subject to their consent, Employees may be called upon to share messages/ data received on their personal devices, which will be requested to be submitted to aid the inquiry in question.

THE PROCESS FLOW OF THE INVESTIGATION PROCESS IS CAPTURED BELOW



REFORMATIVE ACTION

Depending on the severity of the complaint, the following reformative/disciplinary actions(s), as applicable, can be recommended in compliance with the Company policies and procedures:

- If found guilty, the Respondent may be separated from the Company;
- If the Complainant wants to be transferred to another centre or process as a result of the incident, the Company shall assist in the transfer. The Respondent may also be transferred, if the Company deems fit to do so;
- If the Complainant has lodged a false/ malicious complaint, then action will be taken against him/ her for such an act. This may include a warning notice or, suspension; it may also amount to termination of employment and will be treated on a case-to-case basis; While deciding malicious intent, the POSH Committee may consider that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. Malicious intent on part of the complainant is required to be clearly established.
- Apart from the action(s) listed above, any other action(s) as deemed appropriate depending on the severity of the complaint might be recommended in accordance with the Act and the Company policies;
- As per Chapter VI, Section 19 of the Act, in case the Complainant is not satisfied with the reformatory actions taken by the Company and desires to approach the local regulatory regime or any other authority, the POSH Committee will aid the Complainant in initiating action with relevant authorities.

The reformative action will be taken within sixty (60) days of receipt of the recommendation from the POSH Committee.

APPEAL AGAINST THE RECOMMENDATIONS OF THE POSH COMMITTEE

In case the aggrieved employee or the respondent is desirous of appealing against the recommendations of the POSH Committee, he/ she can appeal to the President – Group Corporate HR. In case the aggrieved employee or the respondent is desirous of appealing against the decision of the President – Group Corporate HR, he/she can do so as per section 18 of The Act.

TRAINING & AWARENESS

- As mandated in Chapter VI, Section 19 of the Act, the Company shall conduct regular awareness

programmes for all Employees. Diverse mediums of training and awareness creation like workshops, sessions, computer-based trainings will be used to clearly demarcate unacceptable behaviour in the Company. For online training sessions completed at home/ offsite, Employees shall complete the trainings in all honesty and with integrity.

- The Company shall organise orientation programs, capacity and skill building programs for the members of the POSH Committees.
- The list of POSH Committee members needs to be reviewed and updated on a quarterly basis. In case a POSH Committee member moves out of the Company, the same has to be immediately reported to the POSH convener by the Presiding Officer of the POSH Committee and replacement members identified.

DUTIES OF THE MANAGEMENT

- To provide a safe working environment at its workplace which include safety from the persons coming into contact at the workplace;
- To provide necessary facilities to the POSH Committee for dealing with the complaint and conducting an inquiry;
- To extend necessary assistance to the POSH Committee in securing the attendance of Respondent and witnesses;
- To make available such information to the POSH Committee as it may require, with regard to the complaint made;
- To provide assistance to the Aggrieved employee, if they so choose to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force;
- To cause to initiate action, under the Indian Penal Code (45 of 1860) or any other law for the time being in force, against the perpetrator, or if the Aggrieved employee so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;
- To treat sexual harassment as misconduct under the Service Rules and initiate action for such misconduct;
- To monitor timely submission of reports by the POSH Committee.

NON-DISCLOSURE

The obligation of confidentiality extends to the Complainant, the Respondent and witnesses which means that the below mentioned should not be disclosed:

- the details or identity of the parties involved in the inquiry;
- the procedures of the inquiry underway or concluded;
- the documents, data and reports shared by the POSH Committee or the Company in relation to the inquiry;
- the content of the interviews, discussions and sessions of the inquiry; and (e) the outcome of the inquiry concluded.

The POSH Committee members and the Company are also bound by obligations of confidentiality, which entails that the above-mentioned should not be disclosed:

- the identity of the Complainant, Respondent and witnesses;
- details of the inquiry interviews and procedure of inquiry;
- documents, data and reports pertaining to the inquiry; and
- the outcome of the inquiry.

Provided that the POSH Committee members and the Company may disclose such details on a need to know basis, while conducting the inquiries or as required under law or a regulatory inquiry/lawful request for disclosure.

RECOMMENDATIONS OF THE POSH COMMITTEE

The POSH Committee will submit its report, along with its recommendation to the President – Group Corporate HR once the inquiry is concluded. The President – Group Corporate HR shall consider the recommendation of the POSH Committee in all its fairness and implement the same.

REVIEW

- All cases will be reviewed by the POSH Committee on a quarterly basis and a quarterly report of cases will be presented to the President – Group Corporate HR
- As mandated by Chapter VIII, Section 21 of the Act, the POSH Committee will also maintain an annual report of all cases and POSH related activities carried out during the year
- The Policy will be reviewed annually. On receiving any directions, suggestions or comments from Employees, or as may be derived by POSH Committee during review of the cases reported, the Policy may be amended by the POSH Committee as and when needed.

POLICY REVIEW

This Policy shall be reviewed at least annually or when significant changes are proposed to occur.

CUSTODIAN

Head – HR & Administration



Shailesh Deshmukh
Head – HR & Administration | **Aquapharm Chemical Ltd**

ANNEXURE I

POSH COMPLAINT FORM

Recording Date:		Incident Date:	

Name - Designation of /Victim(s)/Aggrieved:

Name - Designation of Respondent(s)

Complainant:

Investigation Report and Comments :