

## **SEXUAL HARASSMENT POLICY.**

### 1. **COMMITMENT :**

Emmbi Industries Limited is fully committed to upholding the dignity, equality, and safety of all employees, in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and the broader principles of the Indian Constitution, including protection against discrimination based on gender, sexual orientation, and identity.

The Company ensures a work environment that is free from prejudice, gender bias, intimidation, and any form of harassment—including harassment based on sexual orientation, such as that directed toward gay, lesbian, bisexual, or transgender individuals. All employees—irrespective of gender, identity, or orientation—are entitled to be treated fairly, respectfully, and equitably.

To this end, Emmbi Industries Limited has constituted an Internal Committee (IC) as mandated by law and implemented a comprehensive POSH Policy that outlines mechanisms for prevention, reporting, and redressal of complaints. The Company strictly prohibits any form of sexual harassment or discriminatory behaviour and will take prompt and appropriate action against any violation, in line with statutory provisions and internal codes of conduct.

Furthermore, the Company fosters a culture of professional growth, inclusivity, and equal opportunity, and remains committed to sensitizing employees through regular training, awareness programs, and policy reinforcement.

### 2. **DEFINITIONS**

#### **Employee- means:**

A person employed at a workplace 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, apprentice, or called by any other such name.

#### **“Sexual Harassment” means:**

Sexual Harassment is an unwanted, unwelcome, or uninvited behavior of a sexual nature that makes a person feel humiliated, intimidated, or offended. Sexual harassment can take many different forms and may include physical contact and advances, verbal comments, jokes, demand or request for sexual favors, showing pornography, making sexually colored remarks, displaying of offensive material, any other unwelcome physical, verbal, or non-verbal

conduct of a sexual nature, or other behavior which creates a sexually tense or hostile working environment.

The following circumstances, among other circumstances, if they occur 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; or
- (ii) Implied or explicit threat of detrimental treatment in her employment; or
- (iii) Implied or explicit threat about her present or future employment status; or
- (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.

**Aggrieved** means:

In relation to the workplace, a person of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.

**Respondent** means:

Against whom the aggrieved has made a complaint.

**Internal Committee:** means:

An Internal Complaints Committee constituted for the Redressal of sexual harassment complaints.

**Member** means:

A member of the Internal Committee.

### 3. **SCOPE**

This policy applies to all categories of employees of the Company, including management, workmen, trainees, temporary appointees, and employees on a contractual basis.

### 4. **COMPLAINT REDRESSAL COMMITTEE**

The Company has constituted an "Internal Complaints Committee" (the Committee) for redressal of sexual harassment complaints (made by the victim) and for ensuring time-bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise the following members:

Sr No.	Name of the Member	Position in the Committee [ICC Committee]
1	Mr. S.T. Manimarpan	General Manager - Commercial
2	Mrs. Rinku Appalwar	Presiding Officer
3	Ms. Kalpana Lohar	Member

4	Mrs. Himali Amin	Member
5	Mr. Sanjay Rathi	External Member

Emmbi encourages any employee who feels they have been harassed to contact any Committee Member.

5. **REDRESSAL PROCEDURE**

A) Procedure for an Informal Grievance

Redressal:

If you are being harassed:

- (i) Tell the accused that his/her behavior is unwelcome and ask him/her to stop.
- (ii) Keep a record of incidents (dates, days, time, locations, possible witnesses, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.
- (iii) File a complaint as soon as possible. If, after asking the accused to stop their behavior, the harassment continues, report the incident to the Internal Complaints Committee, which has been formed for this purpose.

B) Procedure for Formal Grievance Redressal:

The aggrieved person may submit, in writing, a complaint of sexual harassment at the workplace within three months from the date of the incident, or in the case of a series of incidents, within three months from the date of the last incident.

Provided that such a complaint cannot be made in writing, the Presiding Officer or any Member of the Committee shall render all reasonable assistance to the aggrieved to make the complaint in writing.

If the Committee finds that the circumstances were such that they prevented the aggrieved from filing a complaint within the said period, then the Committee may extend the time limit. However, the extension cannot exceed three months. Additionally, the reasons for extending the time limit must be documented in writing.

Where the aggrieved is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise, his/her legal heir or such other person as may be prescribed may make a complaint.

The Committee member, on receiving a complaint, will inform the committee head. The Committee head would arrange for a meeting within one week of receipt of the complaint to discuss the complaint raised. Once the complaint is received by the Internal Complaints Committee, the committee May, and at the request of the aggrieved, take steps to settle the matter between the

aggrieved and the respondent through conciliation. Provided that no monetary settlement shall be made as a basis of conciliation.

Where a settlement has been arrived at through conciliation, the committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation. Furthermore, the committee shall provide copies of the settlement as recorded to both the aggrieved party and the respondent. Where a settlement is arrived no further inquiry shall be conducted by the committee.

However, if the aggrieved party informs the Committee that any term or condition of the settlement arrived at has not been complied with by the respondent, the Committee shall proceed to investigate the complaint or, as the case may be, forward the complaint to the police. Where both parties are employees, the parties shall, during the course of the inquiry, be given an opportunity to be heard, and a copy of the findings shall be made available to both parties, enabling them to make representations against the findings before the Committee. The inquiry in this case shall be completed by the committee within ninety days.

- iv. On completion of the inquiry, the Committee shall provide a report of its findings to the employer, within a period of 10 days from the date of the completion of the inquiry, and such reports can be made available to the concerned parties.

## **6. MANNER OF INQUIRY INTO COMPLAINT**

- i. On receipt of the complaint, the Committee shall immediately proceed with the inquiry and communicate the same to the Complainant and the person against whom the complaint is made.
- ii. The Committee shall prepare and hand over the Statement of Complaint to the person against whom the complaint is made and give him/her the opportunity to submit a written explanation within 7 days of receipt of the same.
- iii. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made.
- iv. The parties shall not be allowed to bring any legal practitioner to represent them in their case in any stage of the proceedings before the Committee.
- v. The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom the complaint is made, for putting forward and defending their respective case.
- vi. The Committee shall complete the inquiry within a reasonable period but not beyond three months and communicate its findings and its recommendations for action to the GM-HR.
- vii. The GM-HR will direct corrective action in accordance with the recommendation proposed by the Committee and keep the complainant informed of the same.

**Corrective action may include any of the following:**

- a. Written apology
- b. Warning
- c. Change of work assignment/transfer for either the accused or the victim
- d. Withholding of promotion
- e. Withholding of pay rise or increments
- f. Terminating the respondent from service
- g. undergoing a counseling session
- h. conducting a community service

The employer can also take actions other than those mentioned above, if it deems fit.

**7. PUNISHMENT FOR FALSE AND MALICIOUS COMPLAINTS**

- i. If the Committee arrives at a conclusion that:
  - a) the allegation against the respondent is malicious; or
  - b) the aggrieved or any other person making the complaint has made a complaint knowing it to be false; or
  - c) the aggrieved or any other person making the complaint has produced any false or misleading document;

Then, it may recommend to the Company that it take necessary action against the complainant or the person who made the complaint. However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. A malicious intent on the part of the complainant can be established only after conducting an inquiry into the complaint.

- i. If the Committee arrives at a conclusion that during the inquiry any witness had given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness to take action as may be prescribed in the provisions of the statutory laws.
- ii. If a complaint has been made in bad faith, as demonstrated by clear and convincing evidence, disciplinary action, which may include demotion, suspension, or termination, will be taken against the person raising the complaint.

**8. CONFIDENTIALITY**

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential. To protect the interests of the victim, the accused person, and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and

appropriate under the circumstances. All records of complaints, including meeting contents, investigation results, and other relevant materials, will be kept confidential by the Company, except where disclosure is required under disciplinary or other remedial processes. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

#### 9. **POLICY AMENDMENT AND REVIEW**

The Policy will be implemented and reviewed by the HR department. The Company reserves the right to amend, abrogate, modify, and rescind/reinstate the entire policy or any part of it at any time.

**Managing Director**  
**EMMBI INDUSTRIES LTD**