



ANTI SEXUAL HARASSMENT POLICY

Approved on: September 29, 2020
First Revision: December 19, 2020
Second Revision: May 24, 2025



1. TITLE

This policy shall be called the **Anti-Sexual Harassment Policy** ("Policy").

2. COMMENCEMENT

This Policy applies to all employees, vendors, visitors, contractual workers, secondees, or any individual present at the workplace for employment or any other official purpose. It covers incidents during or beyond office hours and is deemed incorporated into the service conditions of all employees.

3. PURPOSE

- 3.1. Indigo Paints Limited ("**Company**") is committed to providing a safe and respectful work environment, free from prejudice, gender bias, and sexual harassment.
- 3.2. The Policy is aligned with directives issued by the Supreme Court of India and the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

4. DEFINITIONS

- 4.1. "**Board**" means the Board of Directors of the Company.
- 4.2. "**Company**" means Indigo Paints Limited.
- 4.3. "**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.
- 4.4. "**Indian Penal Code**" means the Indian Penal Code, 1860, as amended.
- 4.5. "**Internal Committee**" means and includes an Internal Complaints Committee (hereinafter referred to as the "**Committee**").
- 4.6. "**Member**" means a member of the Internal Committee.
- 4.7. "**Parties**" means collectively the complainant and the respondent.
- 4.8. "**Presiding Officer**" means the presiding officer of the Committee and shall be a woman employed at a senior level at the Workplace amongst the Employees.
- 4.9. "**Workplace**" means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the Employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

5. SCOPE

- 5.1. Sexual harassment shall mean and include any of the following:



- a) Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- b) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;
- c) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- d) Act or conduct by a person in authority which creates the environment at Workplace hostile or intimidating to a person belonging to the other sex;
- e) Conduct of such an act at Workplace or outside in relation to an Employee of the Company, or vice versa during the course of employment; or
- f) Any unwelcome gesture by an Employee having sexual overtones.

5.2. 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:

- a) Implied or explicit promise of preferential treatment in employment; or
- b) Implied or explicit threat of detrimental treatment in employment; or
- c) Implied or explicit threat about the present or future employment status; or
- d) Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
- e) Humiliating treatment affecting any person's health or safety.

6. COMPLAINT REDRESSAL COMMITTEE - INTERNAL COMPLAINTS COMMITTEE

6.1. A Committee has been constituted by the Board to consider and redress complaints of sexual harassment. The Members of the Committee are as follows (reconstituted on 24.05.2025):

- a) Ms. Ashwini Deshpande, Presiding Officer
- b) Ms. Divyanshika, Member
- c) Mr. Narayanankutty Kottiedath Venugopal, Member
- d) Ms. Sayalee Yengul, Member

6.2. A quorum of 3 (three) Members is required to be present for the proceedings to take place. The quorum shall include the presiding officer, at least 2 (two) Members, one of whom shall be a lady.

6.3. In case, Ms. Ashwini Deshpande is unavailable, Ms. Divyanshika shall act as the Presiding Officer of the Committee.

7. REDRESSAL PROCESS



- 7.1 Any Employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee or the Company Secretary of the Company in writing with his/her signature within 3 (three) months of occurrence of the incident.

Provided that—where such a complaint cannot be made in writing, the presiding officer or any member of the Committee shall render all reasonable assistance to him/her for making the complaint in writing.

Provided further that the Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented him/her from filing a complaint within the said period.

- 7.2 The Committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
- 7.3 The Committee will hold a meeting with the complainant within 7 (seven) days of the receipt of the complaint, but no later than 10 (ten) days in any case.
- 7.4 At the first meeting, the Committee Members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate his/her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of the event, a lady officer for lady Employees involved and a male officer for male Employees involved shall meet and record the statement.
- 7.5 Thereafter, the person against whom the complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
- 7.6 In the event the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.
- 7.7 In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Board.

8 ENQUIRY PROCESS

- 8.1 The Committee shall immediately proceed with the enquiry and communicate the same to the complainant and the person against whom the complaint is made.
- 8.2 The Committee shall prepare and hand over the statement of allegations to the person against whom the complaint is made and give him/her an opportunity to submit a written explanation, if he/she so desires, within ten (10) days of receipt of the same.
- 8.3 The complainant shall be provided with a copy of the written explanation submitted by the person against whom the complaint is made.



- 8.4 If the complainant or the person against whom the complaint is made desires any witness(es) to be called, they shall communicate in writing to the Committee the names of the witness(es) they propose to call.
- 8.5 If the complainant desires to tender any documents by way of evidence before the Committee, he/she shall supply original copies of such documents. Similarly, if the person against whom the complaint is made desires to tender any documents in evidence before the Committee, he/she shall supply original copies of such documents. Both parties shall affix their signatures on the respective documents to certify these to be original copies.
- 8.6 The Committee shall call upon all witnesses mentioned by both parties.
- 8.7 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.
- 8.8 The Committee shall complete the enquiry within a reasonable period but not beyond three (3) months and communicate its findings and recommendations for action to the Human Resources Department. The report of the Committee shall be treated as an enquiry report on the basis of which the erring employee can be awarded appropriate punishment directly.
- 8.9 The Head of Human Resources will direct appropriate action in accordance with the recommendation proposed by the Committee.
- 8.10 The Committee shall be governed by such rules as may be framed by orders of the Supreme Court or any other applicable legislation enacted subsequently.

9. ADDITIONAL POINTS

- 9.1 The Committee may recommend to the Head of Human Resources the transfer of the respondent or any other appropriate disciplinary action.
- 9.2 The Board shall provide all necessary assistance for the purpose of ensuring full, effective, and speedy implementation of this Policy.
- 9.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- 9.4 The Committee shall analyse and submit a report on all complaints of this nature at the end of the year to the Human Resources Department.
- 9.5 In the event the Committee finds the degree of the offence to be coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Board for making a police complaint.
- 9.6 The Company shall also ensure inclusion of a statement in the Annual Report by its Board stating that the Company has complied with the provisions relating to the constitution of the Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

10. INTERIM RELIEF



During the pendency of the inquiry, on a written request made by the complainant, the Committee may recommend to the employer to:

- a) Transfer the aggrieved individual or the respondent to any other workplace; or
- b) Grant leave to the aggrieved individual for a maximum period of three (3) months, in addition to the leave he/she would otherwise be entitled to; or
- c) Grant such other relief to the aggrieved individual as may be found to be appropriate; or
- d) Restrain the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief is implemented, the Assistant General Manager – HR shall inform the Committee regarding the same.

11. PROHIBITION ON DISCLOSURE OF INFORMATION

This Policy and the law prohibit any person, including Committee members, from publishing, communicating, or making known to the public, press, or media in any manner the contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or the recommendations of the Committee during the proceedings under the provisions of the Act. Any violation of this shall be subject to applicable disciplinary action. Further, the Assistant General Manager – HR shall impose monetary sanctions as per provisions of the Act and Rules.

12. PROTECTION TO COMPLAINANT

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously making an allegation knowing it to be untrue and/or by producing any forged or misleading document) will be subject to applicable disciplinary action.

13. APPEAL

Any person aggrieved by the recommendation of the Committee may prefer an appeal under the relevant provisions of the Act and Rules.

14. AMENDMENTS

This Policy shall be reviewed periodically by the Board and amendments shall be effected subject to approval of the Board, as and when practical difficulties are encountered. However, all such amendments shall be subject to applicable laws, rules, and regulations governing the Company from time to time.