

POSH POLICY

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Talent Mangement-HR Department

Version History

Effective date	Policy No	Prepared by	Legal Vetting	HR Head Approval
30-12-2022	POL_POSH_02	Remya Ann Jose, Head TM		P T George, VP HR
01-10-2023	POL_POSH_03	Remya Ann Jose, Head TM	Jaison M Easow, Chief Officer - Legal	P T George, VP HR
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24-02-2025	POL_POSH_05	Remya Ann Jose, Head TM	Changes made based on the discussion on 3 rd Qtr IC meeting – Dec 2024.	
01-01-2026	POL_POSH_06	Remya Ann Jose, Head TM	Revision of IC Committee	

1) Introduction

- a.1. This policy has been framed for V Guard Industries Ltd and its subsidiaries in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and rules framed thereunder (hereinafter "the Act").
- a.2. Accordingly, while the policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act, and the provisions of the Act shall prevail.
- a.3. Further, as stated in the "V-Guard Pledge" – we are committed in building an organisation culture based on **teamwork / personal integrity / honesty / and respect for human dignity.**
- a.4. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility.
- a.5. V-Guard and its subsidiaries are committed to promoting a safe and inclusive work environment for all employees.
- a.6. We firmly believe in fostering a workplace free from any form of sexual harassment, intimidation, or discrimination against women.
- a.7. This policy outlines our commitment to preventing and addressing instances of sexual harassment and provides guidelines for all women at workplace, to understand their rights and responsibilities to remain free of sexual harassment at workplace.

2) Definitions

2.A Sexual Harassment: Sexual harassment refers to any unwelcome conduct of a sexual nature that creates an intimidating, hostile, or offensive working environment.

2.A.1 It includes, but is not limited to, unwelcome sexual advances, requests for sexual favours, sexually suggestive comments, and any other verbal, nonverbal or physical conduct of a sexual nature.

2.A.2 Sexual harassment may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers.

2.A.3 It may also occur between a V-Guard or subsidiary company employee and someone that employee deals within the course of her work who is not employed by the Company.

2.A.4 "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- a) Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
 - i. Physical contact and advances.
 - ii. Demand or request for sexual favours.
 - iii. Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body.
 - iv. Showing pornography, making, or posting sexual pranks, sexual teasing, sexual jokes
 - v. Demeaning or offensive pictures, cartoons or other materials through calls, chats, email, SMS, MMS etc.

- vi. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes.
 - vii. Giving gifts or leaving objects that are sexually suggestive.
 - viii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy.
 - ix. Persistent watching, following, contacting of a person; and
 - x. Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature
- b) The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to sexual harassment:
- i. Implied or explicit promise of preferential treatment in employment;
 - ii. Implied or explicit threat of detrimental treatment in employment;
 - iii. Implied or explicit threat about the present or future employment status;
 - iv. Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
 - v. Humiliating treatment likely to affect her health or safety.

2.B. The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done.

2.C. Aggrieved women: In relation to a workplace, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent and includes contractual, temporary employees or visitors.

2.D. Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved person/complainant.

2.E. Employee: A person employed at the 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

2.F Workplace: In addition to the place of work [Head office / Branch offices, Factories, Warehouses, labs, vendor locations where Employees work] it shall also include any place where the aggrieved women or the respondent visits in connection with her work, during the course of and/or arising out of employment/ contract/ engagement with V-Guard Industries Ltd., and its subsidiaries, including transportation for undertaking such a journey.

2.G Employer: A person responsible for management, supervision, and control of the workplace

2.H Complainant: The person who lodges a complaint alleging sexual harassment.

3) Roles and Responsibilities

a) Employees:

- i. Treat all co-workers with respect and dignity.
- ii. Refrain from engaging in any form of sexual harassment.
- iii. Report incidents of sexual harassment promptly.

b) Employer, Managers and Supervisors:

- i. Set an example by maintaining professional conduct and promoting a respectful work environment.
- ii. Respond promptly to reports of sexual harassment.
- iii. Support and protect the confidentiality of all parties involved in the complaint process.

c) Human Resources (HR):

- i. Provide guidance and support to employees regarding the prevention and resolution of sexual harassment complaints.
- ii. Establish and train an Internal Committee (IC) to address complaints.
- iii. Ensure a fair and unbiased investigation process.

4) Redressal Mechanism

4.1 V-Guard and its subsidiaries is committed to promptly addressing all complaints of sexual harassment.

4.2 In compliance with the Act, if the complainant's warrants formal intervention, the complainant needs to lodge a written/verbal complaint, which shall be followed by a formal redressal mechanism as described in this Policy.

4.3 In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained.

The following steps outline the redressal mechanism:

4.1. Internal Committee (IC)

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Committee" is to be constituted. The details of the committee to be displayed in the notice board at all locations (Refer Annexure).

4.1.1. Composition & Terms:

- a. Presiding Officer: A woman employed at a senior level in the organization or workplace.
- b. At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge.
- c. One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
- d. At least one half of the total members nominated being women.
- e. The Internal Committee shall hold office for a term of three years from date of constitution.
- f. The committee may convene review meeting in every quarter.

4.1.2. Responsibilities:

- a. Receive and investigate complaints of sexual harassment.
- b. Maintain confidentiality throughout the process in view of the provisions of the law. No information pertaining to the complaint shall be passed on to any other party even during Background verification.
- c. Conduct impartial and fair investigations as per the established procedure.
- d. Recommend appropriate actions and remedies.
- e. Submitting annual reports in the prescribed format.

- f. Ensuring maintenance of complaint register.

4.1.3. Lodging a Complaint:

- i. All Complaints of Sexual Harassments shall be made to the IC. The Complaint is to be addressed to IC at posh@vguard.in.
- ii. If the aggrieved is unable to lodge the complaint on account of her incapacity, the following may do so on her behalf, with her written consent.
 - a. Legal heir
 - b. Relative or friend
 - c. Co-worker – Any person having the knowledge of the incident.
 - d. Location HR
- iii. For cases where the Complainant is a visitor or an employee of a vendor, sub- contractor, business partner or other, the Complainant advised to contact the IC either through email (posh@vguard.in) or through the point of contact specified in the concerned contractual agreement, if any.
- iv. As required, the Complaint may be addressed in coordination with the employer of the Complainant. For example, if an employee from organization 'A' is being harassed by an Employee of V-Guard or its subsidiary the investigation and resolution may be done by V-Guard or the subsidiary Internal Committee in coordination with organization 'A'.
- v. A Complaint relating to Sexual Harassment must be made within three (03) months from the date of the alleged offence.
- vi. In case of a series of events, the Complaint must be made within three (03) months from the date of the last incident.
- vii. A delay, if any, in lodging such Complaint may be condoned by the IC, provided that the Complainant submits sufficient cause for such delay, subject to a limit of another three (03) months. This must be accompanied by all the supporting documents, evidence and the names and addresses of witnesses in connection with the incident of Sexual Harassment.
- viii. Anonymous complaints will not be entertained.

4.1.4. Receiving a Complaint:

The recipient of the complaint shall provide a written acknowledgment of the complaint's receipt within three working days.

The following points are kept in mind by the receiver of the complaint: -

- i. Complaints are carefully heard and acknowledged, with the complainant being assured that the company regards their concerns with utmost seriousness.
- ii. These concerns will promptly be forwarded to the Internal committee and ensures a swift and thorough follow-up POSH Complaint register is maintained by internal committee or authorized representative of internal committee and details of complaints are to be updated in the register.
- iii. Situations are not to be pre-judged. Written notes are taken while listening to the aggrieved women. Complainant is allowed to bring another person to the meeting if they wish.
- iv. When taking accurate notes, complainants' own words, where possible, are used. A clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.

- v. All notes will be kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- vi. The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.
- vii. Care will be taken to prevent any disadvantage to or victimization of either the complainant or the respondent.
- viii. If the complaint is proved to be false or malicious appropriate measures shall be taken by the IC.

4.1.5. Resolution Procedure:

- i. The IC shall initiate a thorough investigation into receipt of a complaint.
- ii. The investigation process shall include collecting evidence, conducting interviews with the complainant, respondent, and any relevant witnesses.
- iii. The IC shall complete the investigation within 90 days from the date of the complaint's receipt.
- iv. After evaluating the evidence, the IC will make recommendations to the VP-HR for disciplinary action, if necessary.
- v. The complainant and respondent shall be informed of the investigation's outcome and any subsequent actions taken.

4.1.6 Interim Measures

If the Complainant makes a request, in writing, the IC may recommend to Employer to take any of the following measures:

- i. Transferring the Complainant or the Respondent to any other workplace.
- ii. Granting leave to the Complainant, subject to a maximum of three (03) months.
- iii. If the Respondent is in a position of power w.r.t the Complainant, such responsibilities shall be reassigned to prevent the Respondent from documenting the Complainant's work performance or composing her confidential report, Grant such other relief as deemed fit.
- iv. Employer will act upon the recommendation and will send an intimation of implementation to the IC.
- v. **Suspension during pending inquiry:**
IC, if the situation so warrants, may recommend suspension of the services of the Respondent as an interim measure pending disposal of the complaint. The Employer may on receipt of the recommendation by the IC consider suspension of services of the Respondent till such time as the inquiry is complete and the final report with findings is submitted to the Employer. The order of suspension in contemplation of inquiry may be issued to the Respondent specifying therein the:
 - a. Reasons for suspension.
 - b. Date and time from which the suspension will operate.
 - c. Approximate timescale of the suspension.
 - d. The amount of subsistence allowance that will be paid to the Respondent.

5) Confidentiality:

All parties involved in the complaint process, including the complainant, respondent, witnesses, and members of

the IC, shall maintain strict confidentiality throughout the investigation.

6) Non-Retaliation:

V-Guard and its subsidiaries strictly prohibits any form of retaliation against individuals who report complaints and witnesses of sexual harassment. Any acts of retaliation will be subject to disciplinary action.

7) Training and Awareness:

V-Guard and its subsidiaries will provide regular training programs on, the prevention of sexual harassment, and the company's policies and procedures. The Learning and Development team shall conduct mandatory POSH training programmes to promote a sexual harassment-free workplace on an annual basis covering all employees.

8) Review of the Policy:

This policy will be reviewed periodically to ensure its effectiveness and compliance with applicable laws and regulations.

9) Conclusion:

V-Guard and its subsidiaries is committed to creating and maintaining a work environment that is respectful, inclusive, and free from sexual harassment. All employees are expected to uphold this policy and contribute to a safe and supportive workplace for women.

ANNEXURE
Internal Committee for Kochi Corporate Location as per POSH Act 2013
INTERNAL COMMITTEE MEMBERS
(Constituted on Jan 01, 2026)

1. Ms. Anjana Narwal, Asst. VP - Corporate Quality : Presiding Officer
2. Soumya Mariam Mathew, Chief Officer – Talent Management : Secretary
3. Ms. Remya Ann Jose, Sr. Manager & Head - Talent Management : Member
4. Mr. Narendra Singh Negi, VP – R&D (Electronics) : Member
5. Ms. Sherin Wilson, PR Specialist - Special Projects : Member
6. Meril Mathew Joy – Manager Legal : Member
7. Mr. Varkichan Petta - Advocate : External Member



V-Guard Industries Ltd.

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