

Policy on Prevention of Sexual Harassment at Workplace

ITL Industries Limited

1. Our Commitment

ITL Industries Limited (is committed to ensuring that all persons engaged with ITL work in an environment that is inclusive and provides an opportunity to bring their best selves at workplace. ITL is committed to provide a work environment that ensures every person at the workplace is treated with dignity, respect and afforded equal treatment. ITL directs its actions to ensure that everyone who visits our workplace, experiences an environment that not only promotes diversity and equality but also mutual trust, equal opportunity and respect for human rights.

ITL does not tolerate any form of discrimination, victimization, or harassment including Sexual Harassment and it is committed to take all necessary steps to ensure that nobody is subjected to any kind of harassment.

This Policy on Prevention of Sexual Harassment (POSH) [“Policy”] is framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 [“Act”] and the Rules framed thereunder which is aimed at providing every woman at the workplace a safe, secure and dignified work environment.

2. Policy Scope & Applicability

All employees of ITL Industries Limited are governed under this policy, including trainees, management trainees, apprentices, interns, staff, full time employees both permanent and on probation and temporary employees who are appointed at any office of the company and for whom any of the above mentioned company discharge its role as a ‘Principal Employer’.

In addition to the above, this policy shall also cover any and all situations where any of the aforementioned employees/person(s) may be subject to any kind of sexual harassment or be perpetrators of sexually inappropriate behavior as a result of an act by:

- i. a third party
- ii. independent contractor and/ or outsider while on official duty

It shall also cover any kind of sexual harassment that any third party, independent contractor and/or outsider may suffer as a result of any act by any of the aforementioned person(s) during the course of or in connection with the conduct of his/her employment duties and obligations.

This Policy comes into force with immediate effect.

3. What is Sexual Harassment at Workplace?

The definition of “Sexual Harassment” under the Act would be the guiding principle. To include any one or more of the following unwelcome acts or behavior (whether directly or by implication but is not limited to):

- Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed as prescribed by the ‘Act’, namely:
 - Physical contact, gestures and advances;
 - Demand or request for sexual favors;
 - Making unwelcome sexual advances, gestures or requests for sexual favors in person, through suggestions including using any electronic media and/or communication method such as E-mail, SMS, WhatsApp, etc.
 - Making sexually colored remarks and offensive visual conduct; or
 - Showing pornography; or
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
 - Using any communication method or social networking sites viz. E-mail, SMS, WhatsApp, etc. for transmitting messages or pictures that are sexually explicit or implied in nature.
- Creating an intimidating, hostile or offensive working environment or atmosphere either by:
 - Verbal conduct such as epithets, derogatory comments or remarks of a sexual nature about person's clothing or body, taunts, slurs, offers of employment or promotion benefits or monetary benefits in exchange for sexual favors, graphic commentary about a person's physical attributes, use of profane, threatening or intimidating language; including calling employees by terms of endearment; using vulgar, kidding or demeaning language.
 - Any unwanted physical contact of a sexual nature including sexually suggestive or offensive touching or deliberate brushing against another's body. Also, conduct against any person, which tantamount to physical assault with intent to disrobe, hitting, kicking pushing, blocking normal movement or intentional physical interference with work.
 - Visual conduct such as leering or the display of derogatory or sexually suggestive or explicit posters, photography, graffiti, drawings, gestures, inappropriate text messages with sexual contour or objects, sexually suggestive or obscene notes, letters, email, internet information, voyeurism.

- Making, publishing, transmitting or posting obscene or sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, WhatsApp, etc.
- Threats and insinuation that a person's employment, wages, promotional opportunities, job or shift assignments, or other conditions of employment may be adversely affected by not submitting to sexual advances or demands for sexual favors and /or enhanced if submitting to sexual advances or demands for sexual favors
- Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes
- Without any nexus to official work, the act of persistent watching, stalking, repeated contacting of a person despite objecting to such conduct
- Offering and/or giving gifts or leaving objects that are sexually suggestive
- Any other act, behaviour (physical or otherwise) or conduct which in the opinion of judicial authorities is adjudicated as covered by the act as sexual harassment.

➤ 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:

- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat about present or future employment status; or
- Interference with work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health or safety

4. Governance mechanism

In accordance with the Act, ITL has constituted Internal Committees ["ICs"] to prevent instances of Sexual Harassment against women and to effectively deal with complaints involving Sexual Harassment and Mrs. Pratibha Kothari is the Chairperson of the committee and two other employee have been nominated in the committee to look into the complaints of the women employees relating to the Sexual Harassment of Women at Workplace.

The ICC will be responsible for:

- Reviewing and investigating complaints.
- Ensuring confidentiality of the complainant and respondent during the investigation process.
- Taking necessary action, including disciplinary action where warranted.

5. Complaint of Sexual Harassment

- Any aggrieved person who has sufficient reason to believe that they are being sexually harassed, directly or indirectly, may submit a written complaint of the alleged incident to any representative of the Internal Committee, along with any documentary evidence available or names of witnesses, to initiate the inquiry.
- An aggrieved person can also address the complaint to their Reporting Manager/Business Unit Head/ Human Resources Team representative/ Ethics and compliance team through various mediums including Email, Call or in-person.
- The complaint must be made within 3 months from the date of the Incident/ last incident.
- The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if it is satisfied that there are bona fide reasons that prevented the aggrieved person from lodging of the complaint.
- Where the aggrieved employee is unable to make a complaint in writing, the Chairperson or any Member of the Internal Committee shall render all reasonable assistance to the employee for making the complaint in writing.

6. Confidentiality and Non-Retaliation

Every person who is a part of the complaint process shall at all times keep the contents of complaint, identity of complainant, respondent and witnesses, and any information relating to conciliation, inquiry and recommendations of Committee confidential.

ITL does not tolerate retaliation or victimization against anybody who identifies and raises issues relating to any form of harassment/discrimination including sexual harassment or who lodges complaints and/or participates in any related proceedings either directly with the management or through the grievance procedures in place.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed under the Act / Code protocols.

7. Training and Awareness

The company will conduct regular training programs to educate employees about sexual harassment, the company's policies, and the procedures for reporting incidents. New employees will be required to attend an orientation on POSH as part of their onboarding process.

8. Monitoring and Review

This policy will be regularly reviewed and updated to ensure its effectiveness. Employees will be informed of any changes to the policy, and feedback will be encouraged.

9. Amendment to the Policy

In accordance with the powers vested in the Board, this Policy has been amended with effect from 14th February 2025. The Board reserves the right to amend any provisions of this Policy substitute any existing provisions with new ones, or replace this Policy entirely with a new Policy as deemed necessary.