



# INDIA GELATINE & CHEMICALS LIMITED

## PREVENTION OF SEXUAL HARASSMENT POLICY (POSH)

### 1. OBJECTIVE & BACKGROUND

India Gelatine & Chemicals Limited ("the Company" or "IGCL") is committed to fostering a workplace that upholds dignity, respect, and equality for all employees and is free from any form of sexual harassment.

The Company upholds a zero-tolerance approach towards any form of sexual harassment and strives to maintain a safe, inclusive, and respectful work environment.

This Policy is formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder.

### 2. DEFINITIONS

**Aggrieved Woman:** Any woman, of any age, who alleges to have been subjected to sexual harassment at the workplace. Includes women who are employed or seeking employment.

**Employee:** Any person employed at the workplace, whether on a permanent, temporary, contractual, probationary, trainee, or internship basis, including co-workers, supervisors, managers, or employer.

**Employer:** Any person responsible for the management, supervision, and administration of the workplace, including management personnel, owner, or head of office/unit/organization.

**Workplace:** Any place where the Company conducts business or official work, including:

- Offices, factories, plants, branches, or units.
- Locations visited for official duties such as client sites, business trips, or training programs.
- Work-related social events, virtual meetings, and official travel.

**Sexual Harassment:** Any unwelcome act or behavior of a sexual nature, whether directly or by implication, including:

- Physical contact or advances.
- Demand or request for sexual favors.
- Sexually colored remarks, showing pornography, sending sexually explicit messages/emails/SMS.
- Any other unwelcome verbal, non-verbal, or physical conduct of sexual nature.





# INDIA GELATINE & CHEMICALS LIMITED

**Respondent:** Any person against whom a complaint of sexual harassment is made, including employees, co-workers, supervisors, managers, clients, or third parties interacting with the workplace.

**Internal Complaints Committee (ICC) / Committee:** Committee constituted under the POSH Act to receive complaints, conduct inquiries, and recommend actions.

**District Officer:** Officer appointed by the State Government to receive annual reports from employers, oversee compliance, and facilitate awareness and redressal mechanisms.

**Third Party:** Any person other than an employee subjected to sexual harassment while interacting with the workplace, including clients, vendors, contractors, interns, or visitors.

**Work-related Interaction:** Any interaction or conduct occurring during or in connection with work, whether on official premises or off-site, including training, events, travel, social gatherings, or virtual communications.

**Complainant:** The person filing the complaint (typically an aggrieved woman).

**Retaliation / Victimization:** Any adverse action taken against an employee for raising a complaint, participating in an inquiry, or assisting the ICC.

**Confidentiality:** Obligation of all parties to maintain confidentiality of complaints, evidence, inquiry process, and findings.

### 3. SCOPE AND APPLICABILITY

This Policy applies to:

- All employees of IGCL (on-roll, contractual, trainees, consultants, and interns) irrespective of level or location and applies equally to relations between superior and subordinates as well as between peers.
- All workplaces, including offices, plants, or any location where IGCL business or official work is conducted.
- Work-related interactions, including those occurring during travel, virtual meetings, events, training, or social gatherings organized by the Company.

### 4. INTERNAL COMPLAINTS COMMITTEE FOR SEXUAL HARASSMENT

The Company has constituted an Internal Complaints Committee (ICC) to receive, investigate, and redress complaints of sexual harassment.

The Committee may seek advice from an external expert or third party as deemed necessary.

The POSH policy has been reviewed and updated by the Board of Directors at their meeting held on 10.11.2025





## **INDIA GELATINE & CHEMICALS LIMITED**

The Committee shall meet at least once every six months and/or as and when a complaint is received. It shall maintain strict confidentiality of all proceedings. Any breach of confidentiality may attract disciplinary action including:

- Written warning or reprimand
- Deduction from salary or benefits
- Suspension
- Termination of employment
- Legal proceedings, if warranted

Confidentiality extends to the **identity of the complainant, respondent, and witnesses**, and disclosure outside the inquiry process is strictly prohibited.

The ICC shall prepare an Annual Report each calendar year, submitting the same to the Board and the District Officer in accordance with Section 21 of the POSH Act.

The Committee shall maintain records for a minimum period of three (3) years, including:

- Complaints received
- Inquiry proceedings and evidence
- Actions taken and recommendations
- Annual report on cases filed, disposed, pending, and actions taken

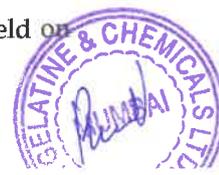
The Committee shall be reconstituted every three (3) years.

### **5. COMPLAINT MECHANISM**

Any incident of sexual harassment will be treated with utmost seriousness. Upon receipt of a complaint, the Company will ensure a prompt, fair, and impartial investigation, and appropriate disciplinary action shall be taken against the offender based on the findings and gravity of the misconduct.

#### **(a) How to File a Complaint:**

- Any employee who believes they have been subjected to sexual harassment may file a written complaint with any member of the Internal Committee (ICC).
- Alternatively, the complainant may approach any senior executive, who must forward the matter to a member of the ICC immediately.
- The complaint should be filed preferably within 30 days from the date of the alleged incident (extendable by up to 3 months if justified in writing).
- If the complainant is unable to draft the complaint, a member of the ICC shall provide necessary assistance.
- The Company has a standard complaint form prescribed under this Policy, which should be used for filing complaints.
- Complaints may be submitted in person, in a sealed envelope, or via email to the Chairperson or any member of the ICC.





# INDIA GELATINE & CHEMICALS LIMITED

## ***(b) Acknowledgment and Inquiry:***

- The ICC shall acknowledge receipt of the complaint within 7 days and forward the same to the respondent for their response.
- The respondent shall submit their reply, along with supporting documents and witness details, within ten (10) working days of receiving the complaint.
- The IC shall initiate the inquiry within ten (10) working days of receipt of the complaint and complete the process within ninety (90) days.
- Both parties shall be given a fair opportunity to present evidence, witnesses, and statements.
- All proceedings shall be conducted confidentially, impartially, and without bias.
- In conducting the inquiry, at least three members of the IC, including the Chairperson, must be present.
- If either the complainant or the respondent fails to appear for three consecutive hearings without sufficient cause, the IC may terminate the inquiry or decide the matter ex parte, after giving 15 days' written notice to the concerned party.

## ***(c) Conciliation:***

- At the request of the aggrieved woman, the Internal Committee (IC) may attempt to resolve the matter through conciliation, provided that no monetary settlement is made as the basis of such resolution.
- If a settlement is reached, it shall be recorded in writing, copies will be given to both parties, and the IC will not proceed with an inquiry.
- If the settlement terms are not complied with, the IC may resume the inquiry.

## ***(d) Interim Relief:***

During the inquiry, the IC may recommend to the management:

- Transfer of either party,
- Granting of leave (up to three months) to the aggrieved employee, or
- Any other interim measure deemed appropriate to protect the complainant.

## ***(e) Inquiry Outcome and Action:***

- The IC shall submit its findings and recommendations in a written report to the management within 10 days of completing the inquiry.
- The Company shall act upon the recommendations within 60 days.
- Possible disciplinary actions may include:
  - a) Written warning
  - b) Written apology
  - c) Reprimand or Censure
  - d) Withholding of Promotion;
  - e) Withholding of pay rise or increments;
  - f) Suspension
  - g) Deduction from salary or benefits
  - h) Termination of employment
  - i) Undergoing a counseling session or carrying out community service.
  - j) Initiation of legal proceedings, if warranted

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# INDIA GELATINE & CHEMICALS LIMITED

## **(f) Additional Provisions:**

- If the aggrieved employee initiates civil or criminal proceedings, the IC may sue moto initiate or continue its own inquiry under this Policy.
- The career interests of the complainant shall not be adversely affected for reporting a complaint.
- If the IC receives an anonymous complaint, it shall inform senior management for examination and follow-up action.
- Department heads and senior executives must remain vigilant and promptly report any behaviour or incident that may contravene this Policy.
- If a complaint is found to be malicious or false, the IC may recommend disciplinary action against the complainant, after due inquiry.
- IGCL strictly prohibits retaliation or victimization against anyone who files a complaint or participates in an inquiry. Any such behaviour will be treated as misconduct and dealt with seriously.

## **6. TRAINING, AWARENESS & COMMUNICATION**

- This Policy shall be displayed prominently at all workplaces.
- Details of the Committee and contact information shall be displayed at conspicuous places.
- The Company shall conduct regular training and awareness programs for all employees.
- Committee members shall undergo periodic sensitization and capacity-building programs.

## **7. REVIEW AND AMENDMENT**

This Policy shall be reviewed periodically and amended as necessary to comply with changes in law or Company practices.

### **Approved by:**

The Board of Directors of India Gelatine & Chemicals Limited

Effective Date: 10.02.2016

Reviewed on: 09.02.2023

Last Reviewed on: 10.11.2025

INDIA GELATINE & CHEMICALS LTD.

  
Executive Director



The POSH policy has been reviewed and updated by the Board of Directors at their meeting held on 10.11.2025