



**Human Resource Department**  
**Prevention of Sexual Harassment Policy**

Doc. No: HR1- 004  
Rev. No: 1  
Date: 09.06.2026

At NGIL, we strive to guarantee a safe and welcoming environment to all those who are employed/visit any of our locations in any capacity. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that employees of the company do not engage in practices that are abusive in any form or manner whatsoever. The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associates is unacceptable. This policy therefore intends to prohibit such occurrences and also lays down procedures to follow when an employee of the Company believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment.

Making a false complaint of sexual harassment or providing false information regarding a complaint will also be treated as a violation of policy. Violation of this policy will call for strict disciplinary action up to and including termination (subject to applicable statutory provisions).

### **Objective**

To fulfill the directive of the Supreme Court of India ensuring all employers to develop and implement a policy against sexual harassment of women at the work place or in the course of official duties. The policy will remain applicable wherever employees have occasion to interact with each other including for example, in vehicles, third party premises, off site meetings and public venues. NGIL encourages employees to raise concerns relating to sexual harassment through accessible, confidential, and independent reporting mechanisms to ensure timely redressal and protection of employee dignity.

1. To uphold Women's' Right to Protection against Sexual Harassment and the Right to Livelihood and towards that end for the prevention and redressal of Sexual Harassment of Women.
2. To evolve an effective mechanism for the prevention, prohibition and redressal of sexual harassment of women at the work place or in the course of official duties with the Company.



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3. To promote an environment that will raise awareness about and deter acts of sexual harassment of employees of the Company.
4. To uphold the commitment of the Company to provide an environment that is free from discrimination and violence against women.
5. To generate general awareness against sexual harassment of women at the workplace

This policy is in line with provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013** enacted by Govt. of India.

### **What is Sexual Harassment?**

Sexual Harassment", for the purpose of this Policy shall include, but will not be confined to the following:

- Unwelcome sexual advances, requests for sexual favors, and/or verbal or physical conduct of a sexual nature; made either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any Company activity;
- Any physical conduct of derogatory nature such as unwelcome touching; lurid stares; physical contact or molestation; stalking; sounds or display of a derogatory nature; passing sexually coloured remarks including but not limited to physical attributes of a person; making sexual gestures; or displaying sexually suggestive or obscene objects, pictures, cartoons, posters, letters, notes, or invitations;
- Granting job favors to those who participate in consensual sexual activity
- Any act or conduct by a person in authority which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the Workplace of the Employee hostile or intimidating to a person belonging to the other / same sex.

### **Composition of Internal Committee (IC):**

Committee will have at least four (4) Members to be nominated by the HR Head/Managing Director.

- At least one-half of the total members will be women.
- Senior level female employee will be nominated as the Presiding Officer.



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- At least one member will be nominated amongst employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
- One external member from amongst NGO/associations committed to the cause of women or a person familiar with the issue of Sexual Harassment/practicing lady advocate in any of courts of the country.

Based on this, an Internal Committee is constituted and actively functioning in NGIL. The constitution of the Internal Committee is communicated to all employees and the same is displayed across company premises.

**Function and Duties of the Internal Committee:**

The Internal Committee shall examine all complaints which it may receive or referred to it whether or not the complaint constitutes an actual offence or not. The Committee shall take suitable measures to create awareness among the women employees in the subject of sexual harassment at work place & the mechanism available at the factory to address such complaints. The Committee shall advise the management on effective steps to be taken to remove hostile work environment and ensure proper working conditions for women.

**Additional Reporting Channels - Ethics Helpline & POSH Reporting**

In line with its commitment to providing a safe, respectful, and harassment-free workplace, Nitta Gelatin India Limited (NGIL) has engaged an independent third-party Ethics Helpline Service Provider, Integrity Matters, to enable employees and other stakeholders to report concerns relating to unethical conduct, whistle-blower matters, Speak-Up concerns, and incidents of sexual harassment.

Employees may report concerns through any of the following channels, in addition to approaching the Internal Committee (IC) directly:

**Integrity Matters - Independent Ethics Helpline**

- **Toll-Free Ethicsline (India):** 1800 102 6969
- **Web Portal:** <https://nittagelatin.integritymatters.in>
- **Email:** [nittagelatin@integritymatters.in](mailto:nittagelatin@integritymatters.in)



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Complaints or concerns received through Integrity Matters relating to Sexual Harassment under the Prevention of Sexual Harassment (POSH) Act, 2013 shall be forwarded to the Internal Committee (IC) for appropriate action in accordance with the provisions of the Act and this Policy.

All reports made through these channels will be handled with due confidentiality, sensitivity, and in accordance with applicable laws and company policies. No employee shall be subjected to retaliation for raising a concern in good faith.

**Inquiry by the Internal Committee:**

On receipt of the complaint on sexual harassment from a woman employee, the Secretary of the Committee, in consultation with the Chairperson, shall convene a meeting of the Committee, preferably within 15 days of receipt of the complaint, and place the complaint before the Committee for consideration. The Committee, after consideration, may conduct a prima-facie inquiry based on principles of natural justice on the complaint and give a hearing to the complainant, her witness (es) and the alleged perpetrator(s). The Committee shall complete the inquiry within 90 days from the date of receipt of complaint and if the Committee finds that a prima facie case is made out, it shall within 10 days, give a report to the HR Head and he will take necessary actions as per provisions in the Act.

If the Committee finds that the matter does not come under sexual harassment and no further action is required, it shall drop the case and convey its decision to the complainant citing the reason for the same.

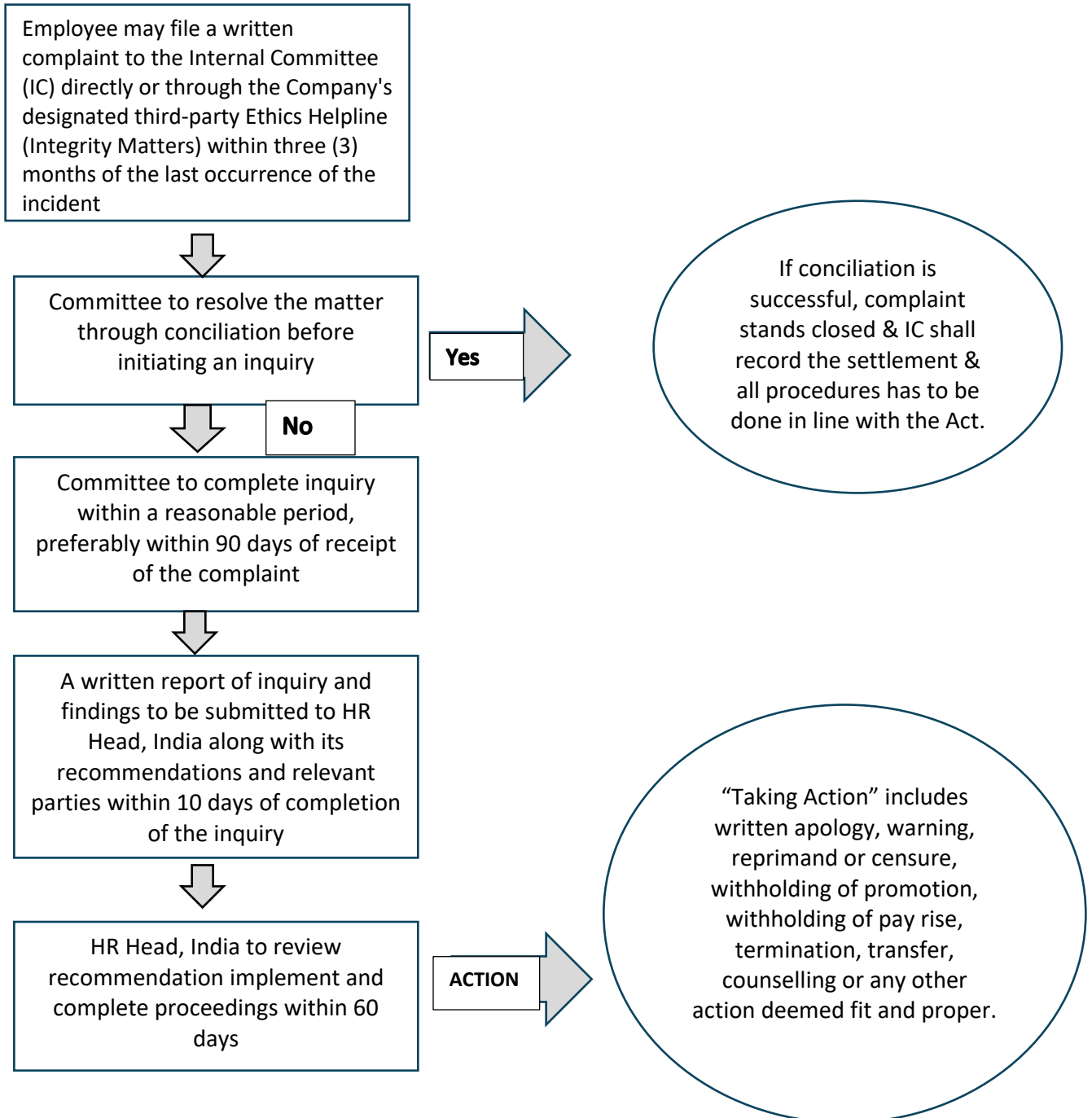
Throughout the proceedings and afterwards at any time, the identity and address of aggrieved woman, respondent and witnesses, any information relating to conciliation, inquiry, proceedings, recommendations of the Committee and action taken by employer shall not be published, communicated or made known to public, press, media in any manner



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**Redressal Process**





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**Penal Consequences /Penalties:**

If found guilty, the Act provides for penalties, which may include a monetary fine or termination of employment, depending on the severity of the offense.

Sexual harassment is a criminal offence under Section 75 of the BNS. The following statutory punishments apply:

<b>Offence Category</b>	<b>Punishment</b>	<b>Legal Classification</b>
Physical contact, advances, demands for sexual favours, or showing pornography	Rigorous imprisonment up to 3 years, fine, or both.	Cognizable & Non-Bailable
Making sexually coloured remarks	Imprisonment up to 1 year, fine, or both.	Cognizable & Non-Bailable

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