DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LTD : NEW DELHI

Policy on Prevention of Sexual Harassment (POSH)

(Approved by the Board of Directors on 24.12.2025)

1. Background

DCM Shriram Fine Chemicals Limited (the 'Company') as an employer is committed to creating the Workplace that is free from all forms of sexual harassment. This Policy (the 'Policy') has been framed to enable employees to work without fear of gender bias and sexual harassment. The Policy is in accordance with the provisions of 'The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the 'Act') read with the "Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the 'Rules') framed thereunder.

The Company believes in the right to equality and personal dignity of all individuals particularly female employees. Any form of sexual harassment at the Workplace shall not be acceptable and shall be regarded as 'misconduct' as per this Policy. The Company has adopted Zero Tolerance towards sexual harassment and will act in accordance with the Act/Rules for violations.

2. Objective

It is important to ensure that employees are aware of their rights and responsibilities as well as their obligations to other employees/ individuals. Prevention of sexual harassment is one of the basic requirements for creating a dignified Workplace for all employees. This Policy has been framed for all employees of the Company to strictly adhere to with the following objectives:

i) To prevent, deter and prohibit the occurrence or commission of any form of Sexual Harassment at the Workplace and/or any Retaliatory Conduct;

ii) To provide a robust mechanism for reporting any incidents of Sexual Harassment at the Workplace and for prompt and effective redressal in responding to sexual harassment complaints in accordance with the Act;

iii) To maintain confidentiality of complaints and related matters;

iv) To ensure that strict action is undertaken against the perpetrators of Sexual Harassment at the Workplace; and

v) To create a non-hostile (conducive) work environment.

3. Applicability

i. This Policy applies to all employees of the Company, irrespective of their rank and place of work.

ii. This Policy is intended to be gender neutral, and not limited to women only.

iii. This Policy also extends to those who are not employees of the Company, such as customers, visitors, vendors, suppliers, contract worker, probationer, trainee, apprentice or called by any other such name, but are subjected to sexual harassment (defined hereinafter) at the premises of the Company.

iv. Any term or expression not defined in this Policy shall have the same meaning as given thereof in the Act.

v. In case of any conflict between this Policy and the Act (and the Rules made thereunder), the latter shall prevail.

4. Definitions

(a) `Sexual harassment' includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:

i) physical contact and advances;
ii) demand or request for sexual favours;
iii) making sexually coloured remarks;
iv) showing pornography or the likes;
v) any other unwelcome/ physical/ verbal or non-verbal conduct of conduct of sexual nature.

The following circumstances, among other circumstances, if it occurs or is present in relation to any sexually determined act or behavior may amount to sexual harassment:

i) implied or explicit promise of preferential treatment in the employment;
ii) implied or explicit threat or detrimental treatment in the employment;
iii) implied or explicit threat about the Aggrieved Person’s present or future employment status;
iv) interference with the Aggrieved Person’s work or creating an intimidating or offensive or hostile work environment;
v) humiliating treatment likely to affect Aggrieved Person’s health or safety.

(b) “Aggrieved Person” in relation to a Workplace, means a person of any age, gender or sexual orientation, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment by an Employee of the Company.

(c) "Complainant" means an Aggrieved Person (and/or any person on behalf of the Aggrieved Person as permitted under the Act), filing a complaint under this Policy, alleging Sexual Harassment at the Workplace.

(d) "Employee" means a person employed with or engaged by the Company for any work on a regular, temporary, ad hoc, daily wage basis or part-time 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, consultant, contract worker, probationer, trainee, apprentice, intern or called by any other such name.

(e) "Employer" means a person responsible for management, supervision and control of the Workplace.

(f) "Respondent" means an Employee against whom a Complainant has made a complaint of Sexual Harassment under this Policy.

(g) "Workplace" includes premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, and controlled by the Company and places visited by the Employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

5. Preventive Steps

Consistent with the Act, the Employer shall take reasonable steps to ensure prevention of sexual harassment at work which may include circulating this Policy and other relevant information to the employees, including to new joinees and making them aware that sexual harassment of any nature shall not be tolerated and will be dealt with strictly as per the provisions of the Act / Rules.

6. Duties of Employer

The Employer shall:

i. provide a safe working environment at the Workplace which shall include safety of the persons coming into contact at the Workplace;

ii. display at any conspicuous place in the Workplace, the penal consequences of Sexual Harassments; and the order constituting, the Internal Committee under sub-section (1) of Section 4 of the Act;

iii. organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed;

iv. provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry;

v, assist in securing the attendance of respondent and witnesses before the Internal Committee.

vi. make available such information to the Internal Committee as it may require having regard to the complaint made under sub-section (1) of section 9 of the Act;

vii. provide assistance to the aggrieved woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;

viii. cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the Workplace at which the incident of Sexual Harassment took place;

xi. treat Sexual Harassment as a misconduct under the service rules and initiate action for such misconduct; and

x. monitor the timely submission of reports by the Internal Committee.

7. Employees' Obligations

Pursuant to the preventive steps mentioned above all employees at all levels shall have the responsibility to:

i. become fully informed and compliant with this Policy;

ii. attend work-shops, if any;

iii. where possible, dissuade a person engaging in unwelcome behaviour from such behaviour;

iv. offer guidance and support to any person, who is suspected to be undergoing harassment and help her to report;

v. desist from and discourage spreading of rumours with regard to any instance of sexual harassment;

vi. maintain confidentiality regarding any aspect of an investigation, which the employee may be party to or may have privilege to know in course of work;

8. Redressal Mechanism

In compliance with the Act, the Complainant needs to lodge a written complaint which shall be followed by a formal redressal mechanism as described in the Policy. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of complaint and signature of the complainant will be obtained.

8.1 Internal Complaints Committee

i. The Company shall have an Internal Complaints Committee ('Committee') at all locations, to specifically address any complaints of sexual harassment. The Committee shall consist of the following members to be nominated by the Company, namely:

   a) Presiding officer, who shall be a woman employed at a senior level at Workplace from amongst the employees. In case a senior level woman is not available the presiding officer shall be nominated from other offices.

   b) Not less than two members from amongst employees preferably committed to the cause of women, who have had experience in social work or have legal knowledge;

   c) One member from amongst NGOs, 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 of the Committee so nominated shall be women. The Presiding officer and every member will hold office for such period not exceeding 3 years.

ii. The Committee shall discharge all functions and responsibilities as mandated by the Act and Rules.

iii. The Committee is responsible for:
   - Receiving complaints of sexual harassment at the Workplace
   - Initiating and conducting inquiry as per the established procedure
   - Submitting findings and recommendations of inquiries
   - Coordinating with the employer in implementing appropriate action
   - Maintaining strict confidentiality throughout the process as per established guidelines
   - Submitting annual reports in the prescribed format.

   Current nominated members of the Committee are given in the **Annexure.**

8.2 Lodging a Complaint

The Complainant needs to submit a detailed complaint in writing along with any documentary evidence available or names of witnesses, to the Committee within a period of 3 months from the date of the incident and in case of a series of incidents within a period of 3 months from the date of last incident. This period can be extended by the Committee for reasons recorded in writing.

8.3 Procedure for dealing with complaints of sexual harassment

The procedure for dealing with complaints of sexual harassment shall be as per the procedure laid down under Sections 10 to 16 of the Act read with the Rules, as amended from time to time.

9. General

i. All complaints of sexual harassment will be kept and treated as confidential to the extent practicable under the circumstances. Only those individuals who receive the complaint or are necessarily involved in an investigatory process and in decision regarding resolution of the complaint will ordinarily be provided access to the information regarding the allegation of sexual harassment. All information regarding the sexual harassment will be kept with the Personnel Department.

ii. This policy encourages the employees to freely, reasonably and in orderly manner express any problem or complaint involving sexual harassment. All formal complaints will be investigated and accordingly acted upon. All steps will be taken to ensure that neither the complainants nor those cooperating with an investigation, including the witnesses are victimized or discriminated against in any way while dealing with the complaint of sexual harassment.

iii. Copy of the Act/ Rules shall be available with the respective Personnel Departments for reference.

iv. The proceedings under this Policy shall not be stalled or postponed merely because the complainant is proceeding against the accused under any other provisions of law.

v. The provisions of this Policy shall not restrict the powers of the management/Company or the complainant to proceed against an alleged offender for any misconduct or seek other legal remedies.

This Policy will come into effect, immediately.

Sd/-
(Urvashi Tilakdhar)
Senior Managing Director

Date: 24.12.2025

Copy to: All concerned

DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

Annexure

S. No.	Status	Name(s)	Designation
1	Presiding officer	Ms. Kokila Arora	Company Secretary & Compliance Officer, Delhi Contact No.: +91-9217335275
2	Members	Ms. Sakshi Mitra Ms. Chitra Adhikari	Jt. Manager – HR, Delhi Assistant Manager, Delhi
3	Outside Member	Ms. Nivedita Puggal	Advocate
4	Secretary	Ms. Divya Gandhi	Manager (Strategic Lead), Delhi