



INDO BORAX & CHEMICALS LTD.

Regd. Office: 302, 3rd Floor Link Rose Building, Linking Road, Santacruz (West), Mumbai - 400054, India.

Ph.: 022 26489142 / 47 / 48 • Fax No. 022-26489143 • CIN : L24100MH1980PLC023177

Email : info@indoborax.com • Website : www.indoborax.com

INDO BORAX & CHEMICALS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

I. COMMITMENT:

Our Company is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company shall ensure compliance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and the rules made thereunder, as amended from time to time.

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

In the event of any inconsistency between the provisions of this Policy and the applicable provisions of the said Act or any statutory modification or re-enactment thereof, the provisions of the Act and the rules made thereunder shall prevail.

In accordance with the POSH Act, the complaint mechanism under this Policy is applicable to complaints of sexual harassment made by women at the workplace. Complaints made by persons other than women may be addressed through the Company's grievance redressal mechanism or Code of Conduct procedures, as applicable.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

II. SCOPE:

This policy applies to all categories of female employees of the Company, including permanent employees and workmen, temporaries, trainees, employees on contract at their workplace, interns, apprentices, consultants, volunteers and any person visiting the workplace. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

- a. all offices, branches, factories, warehouses, and other premises of the Company
- b. any place visited by an employee arising out of or during the course of employment, including transportation provided by the employer
- c. virtual workplaces, including digital communication platforms and remote working environments
- d. accommodation or lodging provided by the employer
any location where work-related meetings, events, or official functions are conducted



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III. DEFINITIONS:

a. SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature. Sexual Harassment at the workplace includes:

- (i) physical contact and advances; or
 - (ii) a demand or request for sexual favours; or
 - (iii) making sexually coloured remarks; or
 - (iv) showing pornography; or
 - (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- b. Aggrieved Woman: means a woman of any age, whether employed or not, who alleges to have been subjected to sexual harassment at the workplace.
- c. Complainant: Any aggrieved person (women) who makes a complaint alleging sexual harassment under this policy
- d. Respondent: A person against whom a complaint of sexual harassment has been made by the aggrieved women
- 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- f. Employer: A person responsible for management, supervision, and control of the workplace.
- g. Workplace: Any premises, locations, establishments, enterprises, institutions, offices, branches, warehouses or units established, subsidiaries, virtual meeting spaces which are controlled by the Company. Places visited by the Employee arising out of or during the course of employment contract/engagement with the Company, including official events, official travels, official picnics and official get-togethers, accommodation and transportation provided by the employer for undertaking a journey.
- h. Company: "Company" means Indo Borax & Chemicals Limited.

IV. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.



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V. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Internal Complaints Committee**” (“**ICC**”) has been created in the Company for time-bound redressal of the complaint made by the victim.

VI. INTERNAL COMPLAINTS COMMITTEE:

The Company has instituted ICC at Head Office and Factory and for redressal of sexual harassment complaints filed by the female employees and for ensuring time bound treatment of such complaints.

Initially, and till further notice, the ICC will comprise of the following members:

1. A senior woman employee as the Presiding Officer
2. At least two employees as Members, preferably committed to the cause of women or having legal knowledge or experience in social work
3. One external member from a non-governmental organization or association committed to the cause of women or a person familiar with issues relating to sexual harassment

Provided that at least one-half of the total members of the Internal Complaints Committee shall be women.

TERMS OF REFERENCE OF ICC:

- i. Receiving complaints of sexual harassment at the workplace
- ii. Initiating and conducting an inquiry as per the established procedure
- iii. Keeping a record of every complaint and settlement and reporting the same to the employer
- iv. Submitting the findings and recommendations of the inquiry
- v. Coordinating with the employer in implementing appropriate action
- vi. Maintaining strict confidentiality throughout the process as per established guidelines
- vii. Submitting annual reports in prescribed format
- viii. providing the requisite copy of the settlement to the parties to the complaint

INTERIM RELIEF

During the inquiry, the ICC may recommend to the employer to:

- i. Transfer the complainant or respondent to any other workplace
- ii. Grant leave to the aggrieved woman for maximum of 3 months
- iii. Restrain the respondent from supervising or evaluating the complainant's work



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iv. Grant any other relief as may be deemed appropriate

v. The complainant can refrain from working on a certain project or location, if she experiences any form of threat from the accused.

APPEAL

Any person aggrieved by the recommendations made by the Internal Complaints Committee or the action taken by the Employer may prefer an appeal in accordance with Section 18 of the POSH Act before the appellate authority notified under applicable law.

ANNUAL REPORT

The ICC shall, for each calendar year, prepare and submit an annual report in the prescribed format to the Employer and the District Officer, in accordance with applicable law.

VII. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim (Women employee) can bring their concern to the attention of the ICC for redressal of their grievances.

The ICC after receipt of written complaint will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal written complaint to ICC constituted by the Management. The complaint shall be made in writing within a period of three months from the date of the incident or the last incident in case of a series of incidents. The ICC may extend the time limit by a further period of three months for reasons recorded in writing. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department and location they are working in, to enable the Presiding Officer or any Member of the ICC constituted by the Management to contact them and take the matter forward.



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2. The ICC shall examine the complaint and initiate an inquiry in accordance with the provisions of the POSH Act, preferably within 30 days from receipt of the complaint.

Before initiating an inquiry, the ICC may, at the request of the complainant, take steps to settle the matter through conciliation, provided that monetary settlement shall not be the basis of such conciliation.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Internal Complaints Committee determines that the allegations fall within the definition of sexual harassment under applicable law, the Committee shall proceed to conduct an inquiry into the complaint in accordance with the provisions of the POSH Act and the rules made thereunder.
4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Internal Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Employer as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Employer will ensure corrective action on the recommendations of the ICC and keep the complainant informed of the same.
6. During the pendency of the inquiry, the Internal Complaints Committee may recommend to the employer interim measures, including transfer of either party, grant of leave up to three months to the complainant, or any other relief deemed appropriate.
7. On the completion of an inquiry, the ICC constituted by the Management, as the case may be, shall provide a report of its findings to the employer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
8. The employer shall act upon the recommendation within sixty days of its receipt. Corrective action may include any of the following:
 - a. Formal apology
 - b. Counselling
 - c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim.
 - e. Suspension or termination of services of the employee found guilty of the offence
9. In case of a false accusation and malicious intent being clearly established, the action for malicious complaints could be counselling, censure, written warning, written apology, suspension, withholding of increments, termination, or any other action that the management deems fit.



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10. Any person aggrieved by the recommendations of the Internal Complaints Committee may prefer an appeal in accordance with the provisions of applicable law.

VIII. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

Confidentiality shall be maintained in accordance with Section 16 of the POSH Act.

IX. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

The Company shall disclose in its Annual Report the number of complaints received, disposed of, and pending during the year, in accordance with applicable law.

X. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XI. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Approved by:

Date: 06.04.2026