

DIPTI CORRUGATING INDUSTRIES PRIVATE LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE (POSH)

In accordance with

**The Sexual Harassment of Women at Workplace
(Prevention, Prohibition and Redressal) Act, 2013**

Registered Office: Thane West, Maharashtra

Version 1.0 | Effective: 2025

Approved by: Board of Directors

Classification: Confidential — Internal Use Only

I. OUR COMMITMENT

Dipti Corrugating Industries Private Limited (hereinafter referred to as 'the Company') is committed to creating and maintaining a workplace where every person — whether on the factory floor, in the office, in the warehouse, or anywhere else on company premises — is treated with dignity, fairness and respect.

We believe that every employee, worker, contractor and visitor has the right to work in an environment that is free from sexual harassment. The Company will not tolerate any form of sexual harassment under any circumstances, and is committed to taking all necessary steps to ensure that this commitment is upheld at all times.

This policy reflects the Company's obligations under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the POSH Act) and the Rules made thereunder. In all matters of interpretation or doubt, the provisions of the Act and Rules shall prevail over this policy.

II. LEGAL BASIS

This policy is framed in compliance with:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013
- Articles 14, 15 and 21 of the Constitution of India, which guarantee equality, non-discrimination and the right to life and dignity
- The Bharatiya Nyaya Sanhita, 2023 (Section 75), which treats sexual harassment as a cognizable and non-bailable offence
- The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), ratified by India in 1993

Every woman has a fundamental right to work with dignity and in safety. Sexual harassment is not merely a workplace misconduct matter — it is a violation of her constitutional and human rights.

III. SCOPE — WHO AND WHERE DOES THIS POLICY APPLY?

Who is covered?

This policy applies to ALL persons associated with the Company, regardless of their designation, type of employment or nature of engagement. This includes:

- Permanent employees (management, supervisory, and workmen)
- Contractual workers, daily-wage workers and piece-rate workers
- Trainees, apprentices and interns
- Employees on probation
- Security guards, housekeeping staff and any other third-party service provider working on Company premises
- Vendors, suppliers, transporters, customers and any other visitor or business associate

A complaint under this policy can be filed by any aggrieved woman, regardless of whether she is a permanent employee or a daily-wage contract worker.

Where does this policy apply?

This policy applies to all locations and situations connected with the Company's work, including:

- All factory premises, production floors, despatch areas, and administrative offices of the Company in Thane West and factory located in Pundhe village, Shahpur where Company business is conducted
- Any off-site location visited by an employee in the course of employment — including visits to a client site, a supplier's premises, or a government office
- Company-arranged transportation — vehicles used to commute or travel for business purposes if any
- Any social gathering, company event, business meeting, training programme or team outing connected with the Company, whether held on or off Company premises

Note: The policy covers conduct that occurs outside normal office hours if it is connected to the workplace or employment relationship.

IV. DEFINITIONS

The following terms are used in this policy:

Aggrieved Woman: Any woman — employed or not, of any age — who alleges that she has been subjected to sexual harassment at the workplace. This includes a woman employed on a daily-wage or contract basis.

Complainant: The aggrieved woman who files a complaint under this policy.

Respondent: The person against whom a complaint of sexual harassment has been made.

Employee: Any person working at the Company's workplace, whether directly employed or through a contractor, with or without remuneration — including permanent staff, contract workers, trainees, apprentices, probationers and piece-rate workers.

Employer: Dipti Corrugating Industries Private Limited, represented by its Board of Directors and the Managing Director.

ICC / Internal Complaints Committee: The Committee constituted by the Company under Section 4 of the POSH Act to receive, inquire into and make recommendations on complaints of sexual harassment.

Workplace: As described in Section III above.

District Officer: The Officer designated by the Government of Maharashtra to oversee the implementation of the POSH Act. For the Company, this is the District Women and Child Development Officer, Thane.

The Act: The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

V. WHAT COUNTS AS SEXUAL HARASSMENT?

Sexual harassment is any unwelcome conduct of a sexual nature — whether physical, verbal, written, or through gestures — that makes a woman feel uncomfortable, unsafe or humiliated.

A single serious incident is enough. It does not have to be repeated. And the intent of the person doing it does not matter — what matters is how the conduct is experienced by the woman on the receiving end.

Forms of Sexual Harassment

The following are examples of conduct that constitute sexual harassment. This list is illustrative and not exhaustive:

- Unwanted physical contact — touching, patting, brushing against someone, blocking their path, stalking
- Demand or request for sexual favours — whether spoken, hinted at, or implied through behaviour
- Sexually suggestive comments, remarks or jokes — including about a person's body, clothing or appearance
- Sending or showing offensive messages, images, videos or material of a sexual nature — through phone, WhatsApp, or any other means
- Staring, leering or making obscene gestures

- Displaying or circulating pictures, posters or material of a sexual nature on the factory floor or in any work area
- Making threats or promises linked to employment — such as threatening to fire someone, withhold wages or delay a salary increment unless sexual favours are provided

Two Types of Sexual Harassment

1. Quid Pro Quo ("This for That"): This happens when a person in a position of authority — a supervisor, manager or any senior person — demands sexual favours in exchange for a job benefit (a promotion, a good shift, continued employment) or threatens punishment if the request is refused. For example: a supervisor telling a contract worker she will lose her job if she does not comply with his demands.

2. Hostile Work Environment: This happens when a pattern of conduct — or even a single serious incident — creates an atmosphere at work that is intimidating, humiliating or offensive for a woman. For example: repeated sexually coloured remarks on the production floor, displaying obscene pictures near the work area, or regular offensive jokes about women among co-workers.

Note: Even a joke, a compliment or a prank can amount to sexual harassment if it is unwelcome and makes the other person feel uncomfortable. Intention alone does not determine whether conduct is harassment.

VI. INTERNAL COMPLAINTS COMMITTEE (ICC)

In compliance with Section 4 of the POSH Act, the Company has constituted an Internal Complaints Committee (ICC) to receive and redress complaints of sexual harassment at the workplace.

Composition of the ICC

The ICC shall consist of a minimum of four members as follows:

- One Presiding Officer — Ms. Ipshita Guha, Director of the Company, has been nominated as the Presiding Officer of the ICC. As a Director, she brings the requisite seniority and authority to lead the Committee effectively.
- Two Members — from among the employees of the Company, who are committed to the cause of women or have experience in social work or possess some legal knowledge. The Company has nominated Mr. Nitin Shelar (Employee) and Mr. Bhagwan Pawar (Shop Floor Supervisor) as Members, ensuring representation from both the administrative and production floor workforce.
- One External Member — Dr. Anonna Guha has been nominated as the External Member. She is an independent POSH practitioner who conducts POSH training and awareness programmes across multiple organisations, and has experience of serving on the Internal Complaints Committees of several companies. She is well-acquainted with issues relating to sexual harassment at the workplace. She is not an employee of the Company.

At least 50% of the total ICC members shall be women, as required by the Act.

The current composition of the ICC is set out in Annexure A to this policy.

#	Role	Name	Designation	Contact
1	Presiding Officer	Ipshita Guha	Director	[9819597343 / dciplthane@gmail.com]
2	Member – Employee	Nitin Shelar	Employee	[9860861201]
3	Member – Shop Floor	Bhagwan Pawar	Shop Floor Supervisor	[8767506048]
4	External Member — Independent POSH Practitioner (conducts POSH training across organisations; serves on multiple ICCs)	Dr. Anonna Guha	Independent External Member	[9987002658 / anonna@nrityanjali.org.in]

Tenure

The Presiding Officer and each Member of the ICC shall serve for a term of seven (7) years from the date of their nomination. The Company shall renominate or reconstitute the ICC at or before the expiry of this term.

Disqualification

A member of the ICC shall be disqualified if they have been convicted of any offence, if they have been found guilty of any disciplinary proceeding, or if any complaint is pending against them under this policy. In such cases, the Company shall nominate a replacement without delay.

Responsibilities of the ICC

The ICC is responsible for:

- Receiving complaints of sexual harassment
- Conducting fair, timely and confidential inquiries
- Providing interim relief to the complainant if required
- Submitting findings and recommendations to the employer
- Maintaining records of all proceedings
- Submitting an Annual Report to the employer and to the District Officer, Thane
- Organising awareness and sensitisation programmes for employees

VII. RESPONSIBILITIES

The Company (Employer) shall:

1. Provide a safe working environment, which is free from the threat or possibility of sexual harassment
2. Display at a prominent location in the workplace — including the factory floor and the canteen — the names and contact details of all ICC members, and the penal consequences of sexual harassment
3. Provide all necessary support, facilities and resources to enable the ICC to function effectively
4. Assist in ensuring the attendance of the respondent and witnesses before the ICC
5. Treat sexual harassment as a misconduct under the Company's service rules and take disciplinary action accordingly
6. Assist the complainant in filing a police complaint if she so chooses
7. Organise at least one awareness and sensitisation workshop per year for all employees
8. Submit the required disclosures in the Board's Annual Report as mandated by law
9. Monitor the timely submission of the Annual Report by the ICC to the District Officer, Thane

All Employees shall:

1. Conduct themselves with dignity and respect towards all colleagues, workers and visitors at all times
2. Refrain from any behaviour that constitutes sexual harassment as defined in this policy
3. Report any incident of sexual harassment that they witness or become aware of — either to the ICC or to a member of management
4. Cooperate fully and honestly with the ICC during any inquiry or investigation
5. Not retaliate against any person who has made a complaint in good faith

Supervisors and Managers additionally shall:

- Set a personal example of respectful and appropriate conduct at all times
- Ensure that their team members understand and comply with this policy
- Take immediate action if they witness or are made aware of any incident of sexual harassment, and report it to the ICC without delay
- Not allow the use of sexually offensive language, gestures or material in their work area

VIII. HOW TO MAKE A COMPLAINT

Who can file a complaint?

Any aggrieved woman who has been subjected to sexual harassment at the Company's workplace may file a complaint. She does not need to be a permanent employee — contract workers, daily-wage workers and trainees are equally entitled to file a complaint.

If the aggrieved woman is unable to file the complaint herself due to physical or mental incapacity, the following persons may file on her behalf (with her written consent):

- Her relative, friend or co-worker
- An officer of the National Commission for Women or State Women's Commission
- A qualified psychiatrist, psychologist or special educator
- The guardian or authority under whose care she is receiving treatment

If the aggrieved woman is deceased, a complaint may be filed by any person with knowledge of the incident, with the written consent of her legal heir.

How to file — Format and Language

Complaints may be submitted in writing — in English, Hindi or Marathi — to any member of the ICC, or directly to the Presiding Officer. If a complainant finds it difficult to write the complaint herself, any member of the ICC shall provide all reasonable assistance in recording her complaint in writing.

The complaint should ideally include:

- Name and contact details of the complainant
- Name of the respondent (the person against whom the complaint is made) and their role in the Company
- A description of the incident(s) — what happened, when and where
- Names of any witnesses, if applicable
- Any supporting documents, messages or other evidence, if available

Complaints may also be filed through the Government of India's SHE-Box portal (Sexual Harassment electronic-Box) at: <https://shebox.nic.in>

Timeline for Filing

A complaint should be filed within three (3) months of the date of the incident, or within three (3) months of the date of the last incident in a series of incidents.

The ICC may extend this deadline by a further three (3) months if the complainant provides a satisfactory reason for the delay — for example, if she was unable to file due to fear, illness or other genuine circumstances. The reasons for extension will be recorded in writing by the ICC.

Note: A complaint against a member of the ICC itself should be submitted directly to the Managing Director, who shall constitute a separate inquiry committee for the purpose.

IX. CONCILIATION — AN OPTION BEFORE FORMAL INQUIRY

Before a formal inquiry is initiated, the ICC may, at the request of the complainant, attempt to settle the matter through conciliation between the complainant and the respondent.

This option is available only if the complainant herself requests it. The ICC will not pressurize the complainant into conciliation.

Importantly, no monetary payment shall be the basis of any conciliation settlement.

If a settlement is reached, the ICC shall record it, provide copies to both parties, and report it to the employer for appropriate action. Once a settlement is arrived at through conciliation, no further formal inquiry will be conducted into that complaint.

Conciliation shall be completed within two (2) weeks of receipt of the complaint, wherever possible.

If conciliation fails or is not requested, the ICC will proceed with a formal inquiry.

X. THE INQUIRY PROCESS

If the complaint is not resolved through conciliation, the ICC will conduct a formal inquiry. The inquiry is conducted in accordance with the principles of natural justice — meaning both parties will have a fair opportunity to present their case.

Step 1 — Receipt of Complaint

On receiving the complaint, the ICC will:

- Acknowledge receipt of the complaint in writing to the complainant within seven (7) working days
- Send a copy of the complaint to the respondent within seven (7) working days of receiving the complaint
- The respondent must submit a written reply, along with supporting documents, within ten (10) working days of receiving the complaint

Step 2 — Hearing

The ICC will hold a hearing with the complainant first, and then separately with the respondent. Each party will have the opportunity to present their case, submit supporting documents and name witnesses.

At least three ICC members, including the Presiding Officer, must be present at each hearing. No legal practitioner may represent any party during the inquiry.

The ICC will call and examine all witnesses named by both parties. If either party wishes to put questions to the other party or to a witness, they may submit the questions in writing to the ICC, which will ask them and record the responses.

Step 3 — Interim Relief

During the pendency of the inquiry, the complainant may submit a written request to the ICC for interim relief. The ICC may recommend to the employer any of the following:

- Transfer the complainant or the respondent to a different work area, shift or department
- Grant the complainant up to three (3) months of special leave (in addition to her regular leave entitlement), without any loss of pay or benefits
- Restrict the respondent from evaluating or supervising the complainant's work during the inquiry period
- Any other interim measure deemed appropriate in the circumstances

Step 4 — Termination of Inquiry (Ex-Parte)

If either the complainant or the respondent is absent from three (3) consecutive hearings without sufficient reason, the ICC may proceed on an ex-parte basis — i.e., continue the inquiry without that party. A written notice of fifteen (15) days will be given to the absent party before this step is taken.

Step 5 — Report

The ICC shall complete the inquiry — including submission of its written report — within ninety (90) days of the date on which the inquiry was commenced.

The report shall contain the findings of the inquiry and the ICC's recommendations on the action to be taken. This report will be submitted to the employer (Managing Director) within ten (10) days of completion of the inquiry.

The employer shall implement the ICC's recommendations within sixty (60) days of receiving the report.

XI. OUTCOME AND ACTION

A. If the Complaint is Proved

Where the ICC finds that the complaint of sexual harassment is substantiated, it shall recommend to the employer one or more of the following actions, depending on the gravity of the conduct:

- a. A formal written warning to be placed permanently on the respondent's employment record
- b. A written apology from the respondent to the complainant
- c. Counselling
- d. Withholding of promotion, increment or any other employment benefit
- e. Change of work assignment, shift or department
- f. Suspension with or without pay
- g. Termination of employment
- h. Any other action the employer deems appropriate and proportionate

Where the ICC finds that the conduct amounts to a criminal offence under the Bharatiya Nyaya Sanhita, 2023 (Section 75) or any other applicable law, the Company shall assist the complainant in filing a police complaint and shall initiate appropriate legal action against the respondent.

B. If the Complaint is Not Proved

If the ICC concludes that the allegations against the respondent have not been established, it will recommend to the employer that no disciplinary action be taken. The ICC shall communicate this outcome to both parties, clarifying that the matter has been fully and fairly investigated and is now closed. Neither party shall be penalised or disadvantaged as a result of the inquiry.

C. If the Complaint is Found to be Malicious or False

If the ICC concludes — through a separate inquiry — that the complaint was filed with malicious intent, or that the complainant knowingly provided false information or forged documents, the ICC may recommend appropriate disciplinary action against the complainant.

Important: An inability to prove a complaint does not, by itself, mean the complaint was malicious. Malicious intent must be clearly and separately established. No woman will be penalised simply because her complaint could not be substantiated.

D. Right of Appeal

Any party aggrieved by the recommendations of the ICC, or by the employer's failure to implement those recommendations, may prefer an appeal to the appellate authority in accordance with Section 18 of the Act. Such an appeal must be filed within ninety (90) days of the date on which the recommendations are communicated.

XII. CONFIDENTIALITY

The Company recognises that it takes great courage for a woman to come forward with a complaint of sexual harassment. The privacy and dignity of everyone involved — the complainant, the respondent and any witnesses — shall be protected at every stage.

The identity of the parties, all statements made during the inquiry, documents submitted, the ICC's findings and the employer's action shall be kept strictly confidential. This information shall not be shared with any person — including colleagues, supervisors, family members or any third party — except to the extent required for conducting the inquiry or implementing its outcome.

Any person — whether an ICC member, an employee or any other person — who discloses confidential information obtained during this process will be subject to disciplinary action. This is in addition to any penalty prescribed under the Act.

Penalty under the Act: Any person who contravenes the confidentiality provisions of the POSH Act is liable to be penalised with a fine of up to ₹5,000.

XIII. PROTECTION AGAINST RETALIATION

No employee who files a complaint in good faith, or who assists in the ICC's inquiry as a witness or otherwise, shall be subjected to any form of retaliation, victimisation or adverse employment action.

Retaliation includes — but is not limited to — threats, termination, demotion, unfair transfer, denial of wages or benefits, public humiliation, or any other act that penalises the person for having come forward.

Any act of retaliation against a complainant, witness or any other person assisting the ICC shall itself be treated as a separate act of misconduct and will result in disciplinary action against the person responsible.

XIV. THIRD PARTY HARASSMENT

If an employee of the Company is subjected to sexual harassment by a person who is not an employee of the Company — such as a vendor, transporter, customer, or visitor — the Company shall take all reasonable steps to support the affected employee and to prevent a recurrence of such conduct.

This may include terminating the business relationship with the third party, restricting their access to Company premises, filing a complaint with the appropriate authorities, or taking any other action within the Company's legal authority.

XV. AWARENESS AND TRAINING

The Company is committed to creating a genuinely informed workplace — not merely a technically compliant one. To this end, the Company shall:

6. Display the names and contact details of all ICC members at prominent locations on the factory floor, in the canteen and in the administrative area, in English and Marathi
7. Display the penal consequences of sexual harassment at the workplace in English and Marathi
8. Conduct at least one awareness and sensitisation workshop per year for all employees, using plain-language materials suitable for a Marathi-speaking workforce
9. Provide orientation and capacity-building training to all ICC members at the time of their nomination and thereafter on a regular basis
10. Make this policy available to all employees in English and, upon request, provide a Marathi summary
11. Include awareness about the POSH policy as part of the induction programme for all new employees, workers and contractors

XVI. ANNUAL REPORTING AND LEGAL COMPLIANCE

The ICC shall, at the end of each calendar year, prepare an Annual Report and submit it to:

- The employer (Managing Director, Dipti Corrugating Industries Private Limited), and
- The District Officer (District Women and Child Development Officer, Thane)

The Annual Report shall contain the following information as prescribed under the Act:

1. Number of complaints of sexual harassment received during the year
2. Number of complaints disposed of during the year
3. Number of cases pending for more than ninety (90) days
4. Number of awareness programmes and workshops conducted during the year
5. Nature of action taken by the employer on the ICC's recommendations

The Company shall also make the required disclosures regarding the ICC and complaints received in the Directors' Report, as required under the Companies Act, 2013.

Penalty for Non-Compliance: An employer who fails to comply with the provisions of the POSH Act is liable to be penalised with a fine of up to ₹50,000. Repeated non-compliance may result in the cancellation of the establishment's licence or registration.

XVII. DISPLAY REQUIREMENTS

As required under Section 19 of the POSH Act, the Company shall ensure that the following are displayed at a conspicuous place on the Company's premises at all times:

- The names and contact details of all members of the ICC
- The penal consequences of engaging in sexual harassment

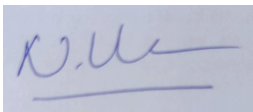
These notices shall be displayed in English and Marathi, and shall be updated promptly whenever there is a change in the composition of the ICC.

XVIII. MANAGEMENT'S COMMITMENT

The Board of Directors and Management of Dipti Corrugating Industries Private Limited reaffirm their commitment to providing every person at this workplace — whether on the production floor or in the office — with an environment of safety, dignity and respect.

We recognise that our factory's workforce is our greatest asset, and that protecting every individual from harassment is not just a legal obligation — it is the right thing to do. We will take every complaint seriously, investigate it fairly, act upon it decisively, and protect the person who has had the courage to come forward.

This policy has been approved by the Board of Directors and is effective from the date mentioned on the cover of this document.



Authorised Signatory

For Dipti Corrugating Industries Private Limited
(Director / Managing Director)

Annexure A. INTERNAL COMPLAINTS COMMITTEE — MEMBER DETAILS

The following persons have been nominated to the Internal Complaints Committee (ICC) of Dipti Corrugating Industries Private Limited with effect from 01.01.2025.

#	Role	Name	Designation	Contact
1	Presiding Officer	Ipshita Guha	Director	[9819597343 / dciplthane@gmail.com]
2	Member – Employee	Nitin Shelar	Employee	[9860861201]
3	Member – Shop Floor	Bhagwan Pawar	Shop Floor Supervisor	[8767506048]
4	External Member — Independent POSH Practitioner (conducts POSH training across organisations; serves on multiple ICCs)	Dr. Anonna Guha	Independent External Member	[9987002658 / anonna@nrityanjali.org.in]

Complaints may be submitted to any of the above members in person, in writing (in English, Hindi or Marathi), or via the SHe-Box portal at <https://shebox.nic.in>

This list will be updated and re-displayed at the workplace whenever there is a change in ICC membership.

Annexure B. HOW TO FILE A COMPLAINT — A SIMPLE GUIDE

This guide is for any woman who has experienced sexual harassment at work and wants to file a complaint. You do not need a lawyer. You do not need to file in English. You can approach any ICC member.

Step 1 — Decide to Come Forward

You have the right to file a complaint. Your job is safe. No one can threaten you or take action against you for filing a complaint.

Step 2 — File Within 3 Months

Try to file your complaint within 3 months of the incident. If there is a genuine reason for the delay, the ICC can extend this by another 3 months.

Step 3 — Submit Your Complaint

You can give your complaint in writing — in English, Hindi or Marathi — to any ICC member. If you find it difficult to write, just speak to any ICC member and they will help you put it in writing. You can also file on the SHE-Box portal at <https://shebox.nic.in>

Step 4 — The ICC Will Take Over

Once the complaint is filed, the ICC will handle everything. They will acknowledge your complaint within 7 working days, keep it confidential, and inform you of the next steps.

Step 5 — You May Ask for Interim Relief

If you feel unsafe at work during the inquiry, you can ask the ICC in writing for a transfer to another area, special leave, or any other protection measure.

Step 6 — The Inquiry and Outcome

The ICC will hear both sides fairly and complete the inquiry within 90 days. You will be informed of the outcome.

Remember: You will not lose your job for filing a complaint. Retaliation against you is itself a punishable offence under this policy.

Annexure C. COMPLAINT AND INQUIRY PROCESS — OVERVIEW

The following is a summary of the end-to-end process from the filing of a complaint to its final resolution:

Step	Action	Timeline
1	Complaint filed by aggrieved woman to any ICC member	Within 3 months of incident (extendable by 3 more months)
2	ICC acknowledges complaint and sends copy to respondent	Within 7 working days
3	Respondent submits written reply	Within 10 working days of receiving complaint
4	Conciliation attempted (only if requested by complainant)	Within 2 weeks of receipt
5	Formal inquiry commenced — hearings with both parties and witnesses	Ongoing
6	Interim relief may be granted to complainant on written request	As needed during inquiry
7	ICC completes inquiry and submits report to employer	Within 90 days of commencing inquiry
8	Employer acts on ICC recommendations	Within 60 days of receiving report
9	Either party may appeal against outcome	Within 90 days of receiving recommendations

This policy is a living document and may be revised from time to time in accordance with changes in law or the Company's requirements. Any revisions will be communicated to all employees and will be displayed at the workplace.