

NEIL INDUSTRIES LIMITED

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Prevention of Sexual Harassment (POSH) Policy

(Approved by Board of Directors at its meeting held on July 18, 2025)

1. Objective

Neil Industries Limited ('the Company') is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. The Company upholds the dignity of every individual, regardless of gender, and expects all employees to foster mutual respect and maintain a professional, respectful work environment.

2. Scope

This policy applies to all employees of the Company, including full-time, part-time, temporary, contractual, interns, consultants, and third parties associated with the organization. It is applicable to all company workplaces, and also to any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer.

3. Definition of sexual harassment

The definition of "Sexual Harassment" shall include but not be restricted to the following. Sexual Harassment is such unwelcome sexually motivated behavior (whether directly or by implication) as:

1. Physical contact and advances.
2. A demand or request for sexual favors.
3. Sexually colored remarks.
4. Showing pornography, writing sexually loaded letters/emails/SMSs
5. And/or any other unwelcome physical, verbal or nonverbal conduct of sexual nature.

Sexual Harassment may also occur if:

- The behavior creates an intimidating, hostile or offensive work environment.
- Refusal to consent to such conduct may result in adverse consequences for the victim.

4. Policy statement

- a) All the employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All the employees will understand and appreciate the rights of the individual to be treated with dignity.
- c) All the employees are required to maintain a work environment, which is free from any kind of harassment.
- d) All the employees will refrain from committing any acts of sexual harassment at work place.
- e) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- f) All the employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

5. Procedure for dealing with complaints of sexual harassment

- a) If the person believes that she has been subjected to sexual harassment, then the complaint/ grievance should be promptly reported to the Redressal Committee formed under the act.
- b) Ideally, the complaint should be lodged immediately or within a reasonable period 3 months from the date of incident/last incident.
- c) All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.
- d) A “Redressal Committee” will be set up to deal with the complaint. A female Director/ employee will head the committee and not less than half of its members will be women.
- e) The complaint committee will thoroughly investigate the complaint / grievance and will take the necessary appropriate course of action.
- f) Any victimization of, or retaliation against, the complainant or any employee who gives evidence regarding sexual harassment or bullying will be subject to disciplinary action up to and including termination of employment.
- g) In case, the complaint lodged is found to be false, malicious or forged and misleading documents have been produced, the redressal committee post investigations may recommend disciplinary action against the complainant.

6. Complaint Mechanism

- Complaint must be made in writing to the company.
- The complaint may be filed by the aggrieved person or someone else on their behalf with proper authorization.

7. Disciplinary Action

If the company concludes that sexual Harassment has occurred, the company shall take appropriate disciplinary action, which may include:

- Warning or reprimand
- Withholding promotion or salary increment
- Suspension
- Termination of employment

False or Malicious complaints will also be subject to disciplinary action, provided it is proven that the complaint was made with malicious intent.

8. Protection against Victimization

The Company ensures that the complainant, witnesses, and others involved in the investigation are protected from retaliation or victimization. Any such action will be treated as misconduct and dealt with accordingly.

9. Redressal Committee (RC)

The committee will be chaired by a Director who shall be a woman. In addition, the members would include one employee from the company who shall be preferably women and one other person who shall be an Independent Director. The members of the committee will be rotated every 3 years as per the discretion of the Board.

10. Confidentiality

The contents of the complaint, the identity and addresses of the aggrieved staff member, respondent and witnesses, any information relating to conciliation and inquiry proceedings, and the action taken by Neil Industries Limited shall not be published, communicated or made known to the public, press and media in any manner. All complaints / grievances of sexual harassment will be taken seriously, will be held in strict confidence and will be investigated promptly in an impartial manner.

11. Members of Redressal Committee (RC)

The Redressal Committee shall comprise of as many members as the Board of Directors may nominate from time to time, provided that at least one-half of the total number of Members shall be women. The present Members of the RC shall comprise of the following:

- (i) One Presiding Officer who shall be a woman Director of the Company;
- (ii) One employee member preferably a women from among the employees of the Company.
- (iii) One member who is an independent Director of the Company.

12. Conclusion

Neil Industries Limited is committed to upholding a workplace culture of respect, dignity, and no tolerance towards sexual harassment. All employees are expected to contribute to this environment by maintaining professional conduct.

Date: 18 July, 2025

Place: Kanpur