IGL SPIRITS LIMITED
(CIN: U11011UT2024PLC018229)

POLICY FOR THE PROTECTION OF WOMEN AT WORKPLACE UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT 2013.

PREAMBLE

The Supreme Court of India in its 1977 judgment in Vishakha and others vs. State of Rajasthan and others makes it obligatory for every employer and other responsible persons to follow the guidelines laid down by the Court and to evolve a specific policy to combat sexual harassment in the workplace.

The Supreme Court in the Vishakha judgment has held that each incident of sexual harassment results in the violation of the fundamental rights of Gender Equality and the Right to Life and Liberty. Sexual harassment is a clear violation of woman's right to gender equality as guaranteed under Articles 14 and 15, her right to live with dignity under Article 21 and her right to work with dignity in a safe environment under Article 19 (1) (g) of the Constitution of India.

The right of women to protection from sexual harassment and the right to work with dignity are recognized as universal human rights by international instruments such as the Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), which has been ratified by India.

In compliance with the mandate of the aforementioned Supreme Court Judgment and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 passed with effect from 23rd April 2013, IGL Spirits Limited adopts the guidelines & procedures to prevent, prohibit and punish sexual harassment of women at the workplace. IGL Spirits Limited is committed to providing for all women who fall within its jurisdiction including its plants/factories and branches a place of work free from sexual harassment, intimidation and exploitation. Every woman shall have a right to be free from Sexual Harassment and the Right to Work in an environment free from any form of Sexual Harassment.

OBJECTIVES OF THE POLICY

- To fulfill the directive of the Supreme Court of India enjoining all employers to develop and implement a policy against sexual harassment of women at the workplace.
- To uphold Women 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.
- To evolve a permanent mechanism for the prevention, prohibition and redress of sexual harassment of women at workplace within the jurisdiction of IGL Spirits Limited and its constituents.
- To actively promote a social, physical and psychological environment that will raise awareness about and deter acts of sexual harassment of women and generate public opinion against sexual harassment of women at the workplace.
- To ensure the implementation of the policy in letter and spirit by undertaking all necessary and reasonable steps including the constitution of appropriate Committees for purposes of gender sensitization and to conduct enquiries into complaints of sexual harassment.
- To uphold the commitment of Ennature Bio Pharma Limited and its constituents to provide an environment free of discrimination and violence against women.

DEFINITIONS

(A) Sexual harassment: The following shall constitute sexual harassment of women employed with Ennature Bio Pharma Limited:

(a) Physical contact and advances;
(b) A demand or request for sexual favours;
(c) Making sexually coloured remarks;
(d) Showing pornography;
(e) Any other unwelcome physical; verbal or non-verbal conduct of sexual nature shall include but not be limited to loaded comments, remarks or jokes, letters, phone calls, SMS or emails, gestures, lurid stares, physical contact, stalking, sounds or display of a derogatory nature have the purpose and /or effect of interfering with a woman's work or performance or of creating an intimidating, hostile or offensive employment or living

environment.

(f) Implied or explicit promise of preferential treatment in her employment;

(g) Implied or explicit threat of detrimental treatment in her employment;

(h) Implied or explicit threat about her present or future employment status;

(i) Humiliating treatment likely to affect her health or safety.

(B) Jurisdiction/applicability: The following shall be included within the jurisdiction of IGL Spirits Limited for the purposes of applicability of this policy:

1) The office premises
   a) Head office located at : Plot 2B, Sector 126, Gautam Budh Nagar, Noida, Uttar Pradesh
   b) Plants located at:
      i) Kashipur
      ii) Gorakhpur

2) Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

3) Any dwelling place/house/guest house accommodation under the control of IGL Spirits Limited.

4) Any other place, including its branch offices which may be recognized by IGL Spirits Limited as its place of work from time to time.

(C) Staff/Employees: The following will be covered under this policy:

1) Regular employees
2) Temporary/part time/adhoc employees/daily wage earners either directly or through an agent/contractor whether for remuneration or not
3) Trainees/apprentices/probationers
4) Person working on a voluntary basis
5) Directors

(D) Employer: Employer refers to IGL Spirits Limited.

RESPONSIBILITIES OF IGL SPIRITS LIMITED AS EMPLOYER:

a) Ensure a safe working environment free from Sexual Harassment for women including prevention and deterrence of Sexual Harassment.

b) Prepare and prominently display the policy for the prevention and

prohibition of Sexual Harassment at workplace giving information for the redressal mechanism that has been put in place and encouraging women employees to file their grievances.

c) Maintain a proactive program to educate all members as to the definition of sexual harassment and procedures for redressal.
d) Facilitate initiation of proceedings under this Policy through the institution of Committee against Sexual Harassment for redressal of an act(s) of sexual harassment.
e) Treat sexual harassment as misconduct under the service rules and initiate action for such misconduct.
f) Monitor the timely submission of reports by the internal committee.
g) To ensure the safety of the complainant and witnesses during the pendency of the enquiry and till the final determination of the complaint.
h) To make arrangements for appropriate legal, psychological / emotional and physical support for the complainant if she so desires in terms of providing referral numbers.

SCOPE OF THE POLICY, RULES AND PROCEDURES

Jurisdiction

These Rules and Procedures shall be applicable to all complaints of sexual harassment made by a woman employee against a male employee of IGL Spirits Limited and its constituent/subsidiary units provided the harassment has taken place at workplace of IGL Spirits Limited as indicated under definitions above.

Structure and composition of the internal complaint committee

Implementation of the policy will be achieved through the following structures:

I. Composition: (at least half of the total members so nominated shall be women)

Presiding Officer	Ms. Ruchi Singh at ruchi.singh@indiaglycols.com
Member 1	Mr. S.K. Shukla at sk.shukla@indiaglycols.com
Member 2	Mr. Shailendra Kumar Pandey at shailendra.k.pandey@indiaglycols.com
Independent Member	Ms. Preeti Grover at grover_preeti@hotmail.com

II. **Duration**: The presiding officer and every member of the committee shall hold office for a period not exceeding 3 years from the date of their nomination.

III. Continuity:

a) To ensure continuity in the Committees against Sexual harassment, each of the outgoing Committee against Sexual Harassment shall nominate one person from among them to continue as a member of the said Committee for another term of 2 years.

b) The representation on the Committee of the category to which the member nominated by the Committee to continue belongs shall accordingly be adjusted to ensure that no category of members is over represented.

Functions of the Internal Complaints & Disciplinary Committee:

a) The Complaints and redressal mechanism at IGL Spirits Limited and its constituent units, has been formulated in accordance with the following principles:

i) The Employer – Company will have a centralized complaints and disciplinary committee to do the following tasks:

- Receive written complaints
- Conduct investigations
- Decide validity of complaints
- Determine redress required
- Decide the penalty to be imposed and to take appropriate action.

ii) All members of the Committee against Sexual Harassment should be neutral and unbiased.

iii) If in the Committee the member representing the category of the plaintiff/complainant is junior in the hierarchy of IGL Spirits Limited to the defendant, then for that particular enquiry that member shall be substituted on the Committee by another person, senior in rank to the defendant.

iv) Filing of a complaint shall not adversely affect the complainant's status/job, salary/promotion, grades etc. During the pendency of an enquiry and till the final determination of a complaint of sexual harassment under this Policy of the Company shall not alter the

conditions of service of the Complainant/Supporter/Witness concerned to their prejudice, as a consequence to the filing, participation or holding of an enquiry under this Policy.

b) For the purposes of the inquiry the internal committee shall have same powers as are vested in a civil court under the Civil procedure Code 1908.

Procedure for Registering Complaints

i. All complaints must be brought by the complainant in person. The following exceptions will be admitted:

a) In cases of forced confinement of the person. In such a case, brought by another person on behalf of the complainant, the committee will examine whether an enquiry, intervention or some other assistance is needed.

b) In cases of appeals where it is difficult for the complainant to travel in person to the location of the appellate body.

c) In exceptional cases, third party/witness complaints may be entertained. In such cases, the committee will ascertain whether the woman alleged to have been sexually harassed wishes to lodge a formal complaint. Once such a complaint is received the committee shall proceed to enquire into it as per the procedure specified.

ii. If the complainant wishes she can be accompanied by a representative.

iii. Complaints can be lodged directly with any member of the Committee against Sexual Harassment. Complaint has to be made within 3 months from the date of the incident and in case of a series of incidents, within 3 months from the date of the last incident. The committee may for reasons to be recorded in writing extend the time limit not exceeding 3 months.

iv. The complaint may be oral or in writing. If the complaint is oral, it shall be reduced in writing by the Complaints Committee member receiving the complaint and the same shall be authenticated by the complainant under her dated signature or thumb impression as the case may be.

v. All complaints made to any Committee member must be received and recorded by the member, who shall then inform the Presiding Officer about the complaint, who in turn shall call a meeting of the Committee.

vi. All meetings of the committee will be called by the Presiding Officer and a notice of not less than 2 working days must be given for the meeting, in exceptional cases emergency meeting may be convened as per the requirement.

vii. Within ten days of the receipt of a complaint, the Committee must determine whether a prima facie case of sexual harassment is made out. It shall carefully consider the complaint and may hear the complainant and the defendant and/or any other relevant person to determine whether an enquiry by the Committee is to be instituted. If the committee considers it necessary to hear the defendant at this preliminary stage it shall issue a notice to him in the prescribed form for the purpose.

viii. No person who is a complainant, witness, or defendant in the complaint of sexual harassment shall be a member of a Committee. Any committee member charged with sexual harassment in a written complaint must step down as member during the enquiry into that complaint.

ix. If the Committee against Sexual Harassment decides not to conduct an enquiry into a complaint it shall record the reasons for the same in the minutes of the Committee meeting. The Committee shall make the same available to the complainant in writing.

x. In the event of the expiry of the term of a Committee against Sexual Harassment during the pendency of an enquiry then for purposes of that complaint the Committee against Sexual Harassment will be regarded as a valid Committee, under this Policy and Service Rules, till the finalising of the Enquiry Report.

xi. A person shall be disqualified from being appointed, elected, nominated or designated as, or for being continued as, a member of any Committee Against Sexual Harassment if there is any complaint concerning sexual harassment pending against him, or if he has been found guilty of sexual harassment/serious misconduct.

Procedure to be followed for inquiry by the Committee:

The Committee shall enquire into the complaint of sexual harassment following procedures in conformity with the principles of natural justice and gender sensitivity.

i. During the pendency of an inquiry, on a written request made by the aggrieved woman, the Committee may -
   - Transfer the aggrieved woman or the respondent to any other workplace
   - Grant leave to the aggrieved woman upto a period of 3 months. Such leave shall be in addition to the leave she would be otherwise entitled.

ii. During the enquiry proceedings the complainant and/or their witnesses and the defendant shall be called separately so as to ensure freedom of expression and an atmosphere free of intimidation. The complainant will be allowed to be accompanied by one representative during the enquiry.

iii. The Committee shall strive to complete the enquiry in the shortest possible time, preferable within three months from the date on which the complaint is referred to and not exceeding it.

iv. Within one week of the institution of enquiry proceedings by the Complaints Committee, the Committee shall prepare a document containing a summary of the complaint such as the location, date and time on which the incident is alleged to have occurred and shall hand over the same to the complainant and the defendant. The defendant shall be given all this information in the prescribed format along with a copy of the Rules and Procedures of this Policy. The Committee shall also make available to the defendant a true copy of the complaint(s) lodged by the complainant(s).

v. The Committee must inform the defendant in writing about the material particulars of the charges made against him and he should be given a period of 5 days to respond to the charge sheet.

vi. The Committee shall provide reasonable opportunity to the complainant and the defendant for presenting and defending her/his case.

vii. Within not more than five working days on the receipt of the first intimation of the enquiry, the complainant and the defendant shall submit, to the Committee in writing, a list of witnesses, together with their contact details, that she/he desires the Committee to examine.

viii. The complainant and the defendant shall be responsible for presenting their witnesses before the Committee. However, if the Committee believes that the absence of either of the parties to the disputes is on valid grounds, the Committee shall adjourn that particular meeting of the Committee for a period not exceeding five days. The meeting so adjourned shall be conducted thereafter, even if the person concerned fails to appear for the said adjourned meeting without prior intimation/valid ground.

ix. The Committee may call any person to appear as a witness if it is of the opinion that it shall be in the interest of justice.

x. The Committee shall have the power to summon any official papers or documents pertaining to the complaint under enquiry.

xi. The Committee may consider as relevant any earlier complaints against the defendant. However, the past sexual history of the complainant shall not be probed into as such information shall be deemed irrelevant to a complaint of sexual harassment.

xii. The Committee shall have the right to summon, as many times as required, the defendant, complainant and/or any witnesses for the purpose of supplementary testimony and/or clarifications.

xiii. The defendant, the complainant, and witnesses shall be intimated at least Twenty Four hours in advance in writing of the date, time and venue of the enquiry proceedings.

The responsibility of communicating with the witnesses lies with the complainant/defendant regarding the date, time and venue of the meeting.

xiv. The Enquiry Committee shall have the right to terminate the enquiry proceedings and to give an ex parte decision on the complaint, should the defendant fail, without valid ground, to present himself for two

consecutive hearings convened by the Enquiry Committee.

xv. The venue of the enquiry should take into consideration the convenience and security of the complainant.

xvi. If the complainant, defendant, or witness desire to appear before the Committee accompanied by one person of their choice, they shall communicate to the Convenor of the committee the name of that person. Such a person shall have only observer status and her/his presence during the proceedings shall be restricted to the testimony of the individual she/he is accompanying.

xvii. The identities of the Complainant and all witnesses shall throughout be protected and kept confidential by the Committee.

xviii. The complainant(s) and the defendant, or any one person on her/his behalf, shall have the right to examine written transcripts of the recordings once prepared with the exclusion of witnesses' names and identities. Any person nominated by the complainant and/or the defendant on her/his behalf shall be only a member of IGL SPIRITS LIMITED. No person who has been found guilty of sexual harassment shall be accepted as a nominee. The complainant(s)/defendant should inform the committee specifically if they wish to exercise this right. At no point in time, however, can the concerned parties take these documents outside the office of the Committee against Sexual Harassment.

xix. The complainant and the defendant shall have the right of cross-examination of all witnesses. However such cross-examination shall be conducted in the form of written questions and responses via the Committee only. The defendant shall have no right to directly cross examine the complainant or her witnesses.

xx. The defendant/complainant may submit to the Committee, a written list of questions that he/she desires to pose to the complainant/witness. The Committee shall retain the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, slanderous, derogatory or gender-insensitive. Any behaviour, verbal or otherwise, on the part of the defendant or his nominee, that is designed to intimidate or subject the complainant or her witnesses to mental and physical trauma, can lead the Committee to recommend disciplinary action against the defendant.

xxi. All proceedings of the Committee shall be recorded in writing. The record of the proceedings and the statement of witnesses shall be endorsed by the persons concerned in token of authenticity thereof.

xxii. All persons heard by the Committee, as well as observers/nominees, shall take and observe an oath of secrecy about the proceedings to protect the dignity of the complainant and the defendant. Any violation of the oath of secrecy may invite penalties.

Exception:

A complainant has the right to go public about the complaint of sexual harassment if she so desires. If the Complainant goes public before filing the complaint with the Committee against Sexual Harassment, the same shall not prejudice the Committee members. Once a complaint has been given to the Committee, the complainant should preferably not go public till the enquiry is completed, unless there are compelling reasons for her to do the same.

xxiii. The members of the Committee shall maintain confidentiality about the proceedings conducted by them.

xxiv. If the complainant desires to tender any documents by way of evidence, the Committee shall supply true copies of such documents to the defendant. Similarly, if the defendant desires to tender any documents in evidence, the Committee shall supply true copies of such documents to the complainant.

xxv. Nothing precludes the Complaints Committee from taking cognizance of any new fact or evidence which may arise or be brought before it during the pendency of the enquiry proceedings.

xxvi. The committee shall be sensitive to the covert, private and insidious nature of Sexual Harassment and shall take into account that often the aggrieved woman may not be able to submit/ present direct or corroborative evidence.

xxvii. The committee shall not permit any evidence or examination based on the aggrieved woman's character, personal life, conduct, personal and sexual history.

xxviii. The committee shall take note of the respective socio-economic positions of the parties, their hierarchy in the respective organization / workplace, the employer-employee equations and other power

differences while appreciating the evidence.

xxix. The committee shall, inform the complainant/s, that she may give her evidence in writing provided that she makes herself available for examination by the defendant on the same, unless the alleged victim of Sexual Harassment opts to give her evidence orally.

xxx. The committee shall inform the complainant/s that she may give her answers to questions of a sensitive nature in writing at the enquiry proceedings during cross examination.

xxxi. All information received in the course of the examination and enquiry into a complaint of sexual harassment shall be held in trust by the concerned Committee Against Sexual Harassment and the same shall not be made available pursuant to an application under the Right To Information Act, 2005. Such information shall constitute an exception under Section 8 (e) of the Right To Information Act, 2005, as the same is held by the Committee Against Sexual Harassment in a fiduciary relationship and the nondisclosure of the same will not be against public interest. To the contrary disclosure of such information may endanger the life or physical safety of the complainant or any of the witnesses. An exception to this Rule will be when the complainant herself applies for information under the Right to Information Act, 2005.

Inquiry to be completed within 90 days:

The enquiry shall be completed and the Enquiry Report shall be prepared within a period of 90 days from the date on which the enquiry is commenced. In the event of any delay in submission of the Enquiry Report the reasons for the same shall be recorded in writing.

Findings of the Committee:

i) If inquiry is conducted and in case of existence of a prima facie case the complaint is to be forwarded within 7 seven days to the police for registering the case under the IPC. The Committee will immediately inform the complainant of her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and /or any action taken under this Policy.

ii) (a) After concluding its enquiry, the Committee shall prepare a detailed and written report of its findings. The enquiry report shall specify the details of the charge(s) against the defendant, the statements made and evidence presented in the enquiry and a discussion of the reasons upon which the findings arrived at by the Committee.

(b) No observations regarding the work and behavior of either the complainant or defendant shall be made which are not related to the alleged act of sexual harassment. However, the Committee may consider as relevant any earlier complaints of sexual harassment against the defendant.

iii) Upon the completion of an inquiry, the said Committee may by a detailed and reasoned order pass any of the following orders:

(a) If the Committee finds no merit in the complaint, it shall write to the competent authority giving reasons for its conclusions. The concerned Committee may then dismiss the complaint which was subject of the Inquiry.

(b) Where the Committee arrives at the conclusion that the allegations against the respondent has been established it may take any of the following disciplinary action:

i. Warning
ii. Written apology
iii. Bond of good behaviour
iv. Gender sensitization
v. Counselling
vi. Adverse remarks in the Confidential Report
vii. Debarring from supervisory duties
viii. Denial of membership of statutory bodies
ix. Denial of re-employment
x. Stopping of increments/promotion
xi. Reverting, demotion
xii. Transfer
xiii. Dismissal
xiv. Withdrawal of residential facilities and prohibition from entry on the campus etc.

(c) On the completion of the inquiry the Committee shall provide a report of its findings to the employer and all the concerned parties within a period of 10 days from the date of completion of the inquiry.

Penalties

1) Any employee of IGL Spirits Limited & its Subsidiaries/Constituents, found guilty under this policy shall be liable for disciplinary action.
2) The penalties listed below are indicative, and shall not constrain IGL Spirits Limited & its Subsidiaries/Constituents from considering others, in accordance with the rules governing the conduct of all employees of the IGL Spirits Limited.
   a. Dismissal
   b. Denial of re-employment
   c. Stopping of increments/promotion
   d. Demotions/Transfer
   e. Withdrawal of residential facilities etc. and prohibition from entry on the campus etc.
3) The disciplinary action will commensurate with the nature and impact of the act of sexual harassment established.
4) The Committee can ask for the suspension/ transfer of the alleged harasser from his official position, during the pendency of the enquiry if his presence is likely to interfere with the enquiry.
5) The victim of sexual harassment will have the option to seek transfer of the perpetrator or their own transfer where applicable.

Malicious Complaints: Where the Committee arrives at a conclusion that the allegation against the respondent is malicious including the production of forged or misleading documents during proceedings, the committee may take action against the woman or person producing forged documents as per the service rules applicable or where no such service rules exist in such manner as may be prescribed by the employer.

Appeal:

i) The complainant and the defendant may prefer an appeal to the court or tribunal if they are dissatisfied with the decision of the Committee.
ii) The appeal shall be preferred within a period of 90 days of the recommendations.

This policy was adopted on 8th September 2026.