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POLICY ON PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

I. INTRODUCTION

SUDARSHAN CHEMICAL GROUP OF COMPANIES ("Group") is an equal opportunity organization committed to fostering a work environment that is safe, inclusive, respectful and free from all forms of discrimination, harassment, intimidation and violence. The Group believes that every individual associated with the organization has the right to work with dignity and mutual respect.

The Group is committed to providing a workplace where every employee, consultant, trainee, intern, volunteer, contractual worker and any other person associated with the organization can perform their duties without fear of prejudice, discrimination, harassment, victimization or retaliation. The Group follows a **zero-tolerance approach towards sexual harassment** and treats any act of sexual harassment as a serious misconduct warranting appropriate disciplinary action.

[Note - Zero-Tolerance: *The Group's zero-tolerance approach means that every complaint of sexual harassment will be taken seriously, investigated thoroughly, and addressed with appropriate action proportionate to the nature and gravity of the misconduct.*]

The Group recognizes that sexual harassment is a violation of an individual's fundamental rights to equality, non-discrimination, equal opportunity, life and dignity. Such conduct not only infringes upon the rights of the aggrieved woman but also undermines the core values of professionalism, integrity, mutual respect and ethical conduct that the Group upholds.

Accordingly, every employee and person associated with the Group is expected to maintain the highest standards of professional behaviour and to treat colleagues, clients, vendors, consultants, visitors and all other stakeholders with courtesy, fairness, respect and dignity.

The Group acknowledges its legal and moral responsibility to take all reasonable steps to prevent, prohibit and redress incidents of sexual harassment at the workplace.

The **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, POSH Act** ("POSH Act") and the Rules framed thereunder provide the statutory framework for prevention and redressal of sexual harassment at the workplace. In compliance with the provisions of the POSH Act, the GROUP has adopted this Policy on Prevention of Sexual Harassment of Women at Workplace ("Policy").

This Policy lays down the Group's commitment towards creating a safe, secure and enabling work environment for women and provides the mechanism for prevention, prohibition and redressal of complaints of sexual harassment. It also sets out the constitution, powers and functions of the IC, the procedure for inquiry into complaints, the rights and responsibilities of all stakeholders, and the measures for maintaining confidentiality and ensuring fair and impartial proceedings.

The Group expects every person associated with Group of Companies to uphold the principles embodied in this Policy and contribute towards maintaining a workplace founded on dignity, equality, mutual respect and professionalism.

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II. SCOPE AND APPLICABILITY

Sr. No.	Entity Name	Abbreviation
1	Sudarshan Chemical Industries Limited	SCIL
2	Sudarshan Colorants India Limited	Sudarshan Colorants
3	Sudarshan Gujarat MFG Private Limited	SGMPL
4	Sudarshan Dahej MFG Private Limited	SDMPL

This Policy has been framed in accordance with the provisions of POSH Act and the Rules made thereunder.

a) Persons Covered

This Policy applies to every woman (cisgender or transgender) who alleges to have been subjected to sexual harassment at the workplace, irrespective of her age or employment status. The Policy extends to:

- Permanent employees;
- Probationers;
- Trainees;
- Apprentices;
- Interns (paid or unpaid);
- Consultants;
- Contractual employees;
- Temporary employees;
- Daily wage workers;
- Volunteers;
- Any woman employed directly or through an agent or contractor;
- Any woman visiting the workplace in connection with the Group's business, including clients, customers, vendors, consultants, service providers, visitors, interview candidates or any other person covered under the POSH Act.

b) Places Covered

This Policy applies to all workplaces of Group, including but not limited to:

- All offices, branches and business locations of the Group;
- Client locations visited during the course of employment;
- Business travel, official tours and transportation provided by the Group;
- Conferences, seminars, workshops, training programmes and business meetings;
- Official social, networking or recreational events organized or sponsored by the Group;
- Any place visited by an employee arising out of or during the course of employment;
- Remote working arrangements, work-from-home, virtual workplaces and interactions through electronic means such as emails, telephone calls, video conferences, online meetings, messaging platforms and other digital communication channels.

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Employees are expected to maintain the same standards of professional conduct, decorum and respect during virtual interactions as are expected within the physical workplace.

c) Third-Party Harassment

This Policy also covers instances where:

- A woman employee is subjected to sexual harassment by a client, customer, vendor, consultant, contractor, visitor or any other third party while in connection with the Group's work.
- A woman visitor, client, consultant, vendor, service provider or any other woman present at the workplace is subjected to sexual harassment by an employee of GROUP.

In such cases, the Group shall take all reasonable steps to provide support to the aggrieved woman, conduct an inquiry wherever the respondent falls within its jurisdiction, and where appropriate, coordinate with the employer of the third party or assist the aggrieved woman in initiating legal proceedings before the appropriate authorities.

Where the alleged respondent is neither an employee nor under the administrative control of the Group, the Group shall, to the extent reasonably practicable, assist the aggrieved woman in seeking appropriate legal remedies.

d) Matters Outside the Scope of this Policy

This Policy does not apply:

- Where both the aggrieved woman and the alleged respondent are third parties having no employment or contractual relationship with Group.
- To complaints made by male employees, as the POSH Act is a gender-specific legislation intended to protect women at the workplace.

However, complaints of sexual harassment made by male employees or any conduct amounting to harassment, bullying or inappropriate behaviour shall be dealt with under the Group's Code of Conduct, Staff Service Rules, Grievance Redressal Policy or other applicable disciplinary procedures. Such conduct shall be treated as misconduct and may invite appropriate disciplinary action.

III. PURPOSE

The objectives of this Policy are to:

- Promote a workplace that is safe, inclusive, respectful and free from sexual harassment.
- Prevent, prohibit and redress incidents of sexual harassment at the workplace.
- Provide every woman associated with the Group a work environment where she is treated with dignity, equality and respect.
- Establish a fair, transparent and confidential mechanism for receiving, investigating and redressing complaints of sexual harassment.
- Ensure compliance with the provisions of the POSH Act and the Rules made thereunder.
- Promote awareness and sensitization among employees regarding acceptable workplace behaviour and professional conduct.
- Provide appropriate support, protection and safeguards against victimisation or retaliation to any aggrieved woman who reports sexual harassment.

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IV. DEFINITIONS

Unless the context otherwise requires, the following expressions shall have the meanings assigned to them under the POSH Act.

1. Aggrieved Woman

"Aggrieved Woman" means, in relation to a workplace, a woman of any age, whether employed or not, who alleges that she has been subjected to any act of sexual harassment by the Respondent.

For the purpose of this Policy, the term includes women employees (cisgender or transgender), contractual employees, temporary employees, probationers, trainees, apprentices, interns (paid or unpaid), consultants, volunteers, clients, vendors, visitors, and any other woman present at the workplace in connection with the Group's business.

2. Employee

"Employee" means a person employed at a workplace for any work on a regular, temporary, contractual, ad hoc, daily wage, part-time or full-time basis, either directly or through an agent, with or without the knowledge of the principal employer, whether for remuneration or otherwise.

For the purpose of this Policy, the term includes permanent employees, probationers, trainees, apprentices, interns, consultants, contractual employees, co-workers, volunteers and all persons engaged by the Group in any capacity.

3. Employer

"Employer" means the person responsible for the management, supervision and control of the workplace.

For the purpose of this Policy, "Employer" shall mean the respective management of the entities mentioned in **II. SCOPE AND APPLICABILITY**, acting through any person responsible for the management, supervision and control.

[Note: Not every group entity will have a Managing Director or CEO. The term "Employer" shall be construed accordingly for each entity.]

4. Internal Compliance Committee (IC)

"Internal Compliance Committee" means the Committee constituted under Section 4 of the POSH Act.

The IC shall not only inquire into complaints of sexual harassment but shall also undertake awareness programmes, sensitisation initiatives and recommend measures for prevention of sexual harassment within the organisation.

5. Presiding Officer

"Presiding Officer" means the senior woman employee nominated by the Employer to preside over the IC in accordance with the provisions of the POSH Act.

6. Respondent

"Respondent" means a person against whom the Aggrieved Woman has made a complaint of sexual harassment.

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7. Workplace

For the purpose of this Policy, "Workplace" shall have the meaning assigned under Section 2(o) of the POSH Act and shall include, without limitation:

- All offices, factories, plants, branches and business establishments of the Group;
- Any place visited by the employee arising out of or during the course of employment;
- Client premises and vendor locations;
- Official travel, transportation provided by the Group and accommodation during official travel;
- Conferences, seminars, workshops, training programmes and official meetings;
- Business dinners, official social events and networking events organised or sponsored by the Group;
- Work-from-home arrangements, remote working locations and virtual workplaces;
- Digital platforms including emails, telephone calls, messaging applications, video conferences and other electronic means used for official communication.

8. Sexual Harassment

In accordance with Section 2(n) of the POSH Act, "Sexual Harassment" includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication:

- Physical contact and advances;
- Demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Sexual harassment may include, but is not limited to:

- Sending sexually explicit messages, emails, photographs, videos or emojis through electronic or social media platforms;
- Inappropriate comments, jokes, gestures or repeated unwelcome compliments of a sexual nature;
- Persistent requests for dates or personal meetings after refusal;
- Sexual advances, stalking or unwanted physical proximity;
- Demanding sexual favours in exchange for employment benefits, promotion, appraisal, salary increase, confirmation, transfer or any other employment advantage;
- Threatening adverse employment consequences for refusing sexual advances;
- Displaying sexually explicit material at the workplace or during virtual meetings;
- Any conduct that creates an intimidating, offensive, humiliating or hostile work environment;
- Any unwelcome conduct of a sexual nature that interferes with an individual's work, dignity, health, safety or well-being.

9. Quid Pro Quo Sexual Harassment

Quid Pro Quo sexual harassment occurs when employment benefits or detriments are made contingent upon submission to, or rejection of, unwelcome sexual conduct.

Illustratively, it includes:

- An implied or express promise of preferential treatment in employment;
- An implied or express threat of detrimental treatment;
- An implied or express threat regarding present or future employment status.

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10. Hostile Work Environment

A hostile work environment exists where unwelcome conduct of a sexual nature creates an intimidating, offensive, humiliating or hostile workplace or unreasonably interferes with an individual's work performance or adversely affects her health, safety or dignity.

V. CRIMINAL REMEDIES

The remedies available under this Policy are in addition to any remedy available under applicable criminal law.

An aggrieved woman may, independent of or in addition to proceedings under this Policy, lodge a criminal complaint where the alleged acts constitute an offence under the Bharatiya Nyaya Sanhita, 2023.

Where the complaint discloses the commission of a cognizable offence, the IC shall advise and, wherever requested, assist the aggrieved woman in lodging a complaint with the appropriate law enforcement authorities in accordance with the provisions of the Bharatiya Nagarik Suraksha Sanhita, 2023.

VI. COMPLAINTS MECHANISM

The Group is committed to providing a fair, impartial, confidential and effective mechanism for the prevention and redressal of complaints of sexual harassment.

In accordance with the provisions of the POSH Act, every office or administrative unit of Group employing ten (10) or more employees shall constitute an IC as required under Section 4 of the POSH Act.

The IC shall function independently while adhering to the principles of natural justice, confidentiality, fairness and impartiality in conducting inquiries.

Constitution of the Internal Compliance Committee (IC)

Pursuant to the Repealing and Amending Act, 2016, the nomenclature "Internal Complaints Committee" has been substituted with "IC."

The IC shall consist of members appointed in accordance with Section 4 of the POSH Act and shall comprise:

- A Presiding Officer, who shall be a senior woman employee at workplace among the employees.
- At least two employee members committed to the cause of women or having experience in social work or legal knowledge.
- 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.

At least one-half of the total members of the IC shall be women.

The members of the IC shall hold office for such period as prescribed under the POSH Act and the Rules framed thereunder.

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VII. TWO-TIER COMMITTEE STRUCTURE

Considering the multi-location operations of the Group, the Group adopts a two-tier governance structure for effective implementation of the POSH Act while ensuring statutory compliance.

1. Governance Committee

The Governance Committee shall function as the apex coordinating body for implementation of the POSH Policy across all entities and locations of the Group.

Important Note: The Governance Committee is **not a statutory body** and shall not exercise any statutory powers vested in any of the Location ICs. It shall function solely as a coordinating and monitoring body.

Composition of the Governance Committee:

Role	Designation
Member	Head – Finance
Member	Head – People Practice & CSO

Important Provisions:

- Governance Committee members shall hold office for a period of **3 years** from the date of nomination.
- A member may resign at any time by tendering written resignation to the Group.
- The Governance Committee may co-opt additional members as required for specific cases.

Roles and Responsibilities of the Governance Committee:

Responsibility	Description
Group Governance & Oversight	Provide overall governance, strategic direction and oversight for implementation of the POSH Policy across all entities and locations of the SUDARSHAN GROUP.
Policy Standardization	Ensure uniform interpretation and implementation of the POSH Policy and statutory compliance across the Group.
Monitoring of Location ICs	Review the functioning of all Location ICs and provide guidance, mentoring and administrative support to ensure effective implementation of the POSH Act.
Inter-Location Complaints	Where the complainant and respondent belong to different locations or where jurisdiction is unclear, determine the appropriate Location IC to conduct the inquiry or constitute a suitable committee in accordance with the POSH Act.

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Inter-Entity Complaints	Coordinate complaints involving employees of different Group entities and facilitate the appropriate statutory IC having jurisdiction to conduct the inquiry.
Conflict of Interest / Complaints Against IC Members	Examine situations involving allegations of bias, conflict of interest or complaints against members of a Location IC and recommend appropriate corrective measures, including reconstitution of the committee, replacement or recusal of members, or transfer of the inquiry to another appropriately constituted IC, wherever necessary.
Training & Capacity Building	Organise induction programmes, refresher training, awareness campaigns and capacity-building initiatives for IC members and employees across the Group.
Annual Reporting & Compliance	Consolidate annual reports received from all Location ICs, monitor statutory compliance and facilitate submission of consolidated compliance reports to the Management and other authorities, wherever applicable.
External Liaison	Coordinate with the District Officer, Local Committee, external experts, trainers and other statutory authorities whenever required for implementation of the POSH Act.
Review of Systemic Issues	Analyze anonymized trends, recurring issues and systemic concerns emerging from inquiry reports and recommend policy improvements, preventive measures and organisational interventions, without interfering with the findings or recommendations of the concerned Location IC.
Uniformity & Consistency	Promote consistency in inquiry procedures, documentation, timelines and adherence to principles of natural justice through common governance standards and, wherever legally permissible, common Presiding Officer and External Member across Location ICs.

2. ICs – Location Wise

Every office, establishment or administrative unit of the Group employing ten (10) or more employees shall constitute a Location IC in accordance with Section 4 of the POSH Act. **Location IC remains the statutory committee under the Act.**

Each Location IC shall:

- Receive and acknowledge complaints of sexual harassment arising within its jurisdiction.
- Conduct inquiries in accordance with the POSH Act, POSH Rules, Group's POSH Policy and follow the principles of natural justice.
- Recommend appropriate interim relief, disciplinary action and other remedial measures.
- Maintain strict confidentiality throughout the proceedings.
- Submit inquiry reports to the Employer.
- Maintain records.
- Conduct awareness programmes, orientation sessions and capacity-building initiatives.
- Recommend preventive measures to foster a workplace free from sexual harassment.
- Assist the Employer in ensuring compliance with the statutory obligations under the POSH Act.

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The IC members other than the Presiding Officer and the External Member shall be nominated from the respective entity or location, depending upon the establishment where the complaint arises.

- Wherever feasible, the Presiding Officer and External Member may remain common across all Location ICs to ensure consistency in decision-making, uniformity in procedures and adherence to best practices throughout the Group, **provided that such appointment complies with Section 4 of the POSH Act** (i.e., the Presiding Officer is a senior woman employee at the workplace).
- **The Presiding Officer (Madhuri Sanas) and External Member (Adv. Ujwala Kadrekar) shall remain the same for all Location ICs** to ensure uniformity and consistency in enquiry procedures and fair practices.

Location ICs is the exclusive authority to receive complaints, conduct inquiries and make recommendations.

Roles and Responsibilities of the Location IC:

Responsibility	Description
Receiving Complaints	Receive complaints of sexual harassment arising within its territorial and organisational jurisdiction.
Assistance to Aggrieved Woman	Provide reasonable assistance to the aggrieved woman in reducing the complaint into writing where she is unable to do so herself.
Conciliation	Facilitate conciliation at the request of the aggrieved woman before commencement of the inquiry, provided that no monetary settlement forms the basis of such conciliation.
Inquiry	Conduct inquiries in accordance with the provisions of the POSH Act, the principles of natural justice and this Policy.
Interim Relief	Recommend appropriate interim measures to the Employer during the pendency of the inquiry, including transfer of either party, leave to the aggrieved woman or any other appropriate relief under the POSH Act.
Recommendations	Submit the inquiry report together with findings and recommendations to the Employer within the timelines prescribed under the POSH Act, with a copy to the Governance Committee for record and compliance monitoring.
Confidentiality	Maintain strict confidentiality of the complaint, proceedings, evidence, recommendations and all related records in accordance with Section 16 of the POSH Act.
Awareness & Prevention	Conduct awareness programmes, orientation sessions and preventive initiatives at the respective location.

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Record Maintenance	Maintain records of complaints, inquiries, recommendations, actions taken and other statutory records in accordance with the POSH Act.
Annual Reporting	Submit the Annual Report to the Employer and facilitate submission to the District Officer as required under the POSH Act. A copy shall also be furnished to the Governance Committee for consolidation of Group-level compliance reporting.
Coordination	Coordinate with the Governance Committee regarding policy implementation, training, standardisation of procedures and statutory compliance, while independently discharging its inquiry functions under the POSH Act.

VIII. REPORTING OF INCIDENTS AND COMPLAINT MECHANISM

1. Filing of Complaint

An aggrieved woman who believes that she has been subjected to sexual harassment at the workplace may submit a written complaint to the IC having jurisdiction over the workplace where the alleged incident occurred.

The complaint may be submitted:

- in writing, duly signed by the complainant;
- **by e-mail through the common POSH e-mail ID: posh@sudarshan.com; or**
- through any other mode recognised under this Policy.

[Note: The common POSH email ID posh@sudarshan.com has been established for receipt of complaints across all locations and entities of the Group. Complaints received on this email ID shall be promptly forwarded to the appropriate Location IC having jurisdiction over the matter].

The complaint should, as far as practicable, contain:

- details of the incident(s);
- date(s), time(s) and place(s) of occurrence;
- name(s) of the respondent(s);
- names of witnesses, if any;
- copies of relevant documents, electronic communications or other supporting evidence, if available.

Access to the designated POSH e-mail ID shall be restricted to the IC (as provided under Section 9 of the POSH Act) and such authorised officials as may be nominated by the Employer for administrative purposes, subject to strict confidentiality.

Where the complaint involves multiple entities or locations, or where the appropriate jurisdiction is uncertain, the complaint may initially be received by the Governance Committee, which shall promptly refer it to the appropriate Location IC for inquiry.

2. Limitation

- The complaint shall ordinarily be made within three (3) months from the date of the incident.
- In case of a series of incidents, the complaint shall be filed within three (3) months from the date of the last incident.

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- C. The IC may, for reasons recorded in writing, extend the limitation period by a further period not exceeding three (3) months if it is satisfied that circumstances prevented the complainant from filing the complaint within the prescribed period.

3. Assistance in Filing Complaint

Where the complainant is unable to make a written complaint, the Presiding Officer or any Member of the IC shall render all reasonable assistance in reducing the complaint into writing.

Where a verbal complaint is received, the complaint shall be reduced into writing, read over to the complainant and signed by her before being registered.

4. Complaint Received by Any Other Employee

Any employee, supervisor, manager or officer receiving a complaint or information relating to sexual harassment shall immediately forward the same to the IC (as provided under Section 9 of the POSH Act) without attempting to investigate, mediate or resolve the matter.

Such person shall maintain strict confidentiality regarding the complaint.

5. Complaint by Another Person

Where the aggrieved woman is unable to make a complaint on account of physical incapacity, mental incapacity, death or any other reason recognised under the POSH Act and Rules, the complaint may be made on her behalf by such person(s) as permitted under the Sexual Harassment of POSH Act.

6. SHE-Box

In addition to the internal complaint mechanism, an aggrieved woman may submit her complaint through the Sexual Harassment Electronic Box (SHE-Box) portal notified by the Government of India.

[Note: The SHE-Box portal is an additional mechanism for registration of complaints. Details of the SHE-Box portal are available on the Government of India's official website.]

Submission of a complaint through SHE-Box shall not affect or restrict the complainant's right to approach the IC directly. Where a complaint is received by the Group through SHE-Box or any other statutory authority, the IC shall process the complaint in accordance with the provisions of the POSH Act and this Policy.

IX. REDRESSAL MECHANISM

A. Conciliation

Before initiating an inquiry, the IC may, at the written request of the aggrieved woman, attempt to settle the matter through conciliation.

No monetary settlement shall be made the basis of conciliation.

Where a settlement is arrived at:

- the terms shall be recorded in writing;
- copies shall be provided to both parties;
- the settlement shall be forwarded to the Employer for implementation; and
- no further inquiry shall be conducted unless the respondent fails to comply with the terms of settlement.

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B. Formal Inquiry

Where:

- conciliation is not requested;
- conciliation fails; or
- the respondent breaches the terms of settlement,

The IC shall proceed with a formal inquiry in accordance with the POSH Act.

The inquiry shall be conducted expeditiously and in accordance with the principles of natural justice.

The IC shall endeavour to complete the inquiry within ninety (90) days from receipt of the complaint, as prescribed under the POSH Act.

C. Protection from Retaliation

The Group is committed to ensuring that no person is subjected to retaliation, victimisation or any adverse action for making a complaint of sexual harassment, participating in an inquiry, acting as a witness, providing information or otherwise assisting the IC in the discharge of its functions.

Retaliation in any form is strictly prohibited. Without limitation, retaliation includes:

- Intimidation, threats or coercion;
- Victimization or harassment;
- Adverse performance appraisal or unfair evaluation;
- Demotion, denial of promotion or withholding of increments;
- Transfer or change of duties intended as a punitive measure;
- Exclusion from meetings, projects, training opportunities or workplace activities;
- Discrimination or any adverse change in terms and conditions of employment;
- Any other act intended to discourage or penalize a person for exercising rights under this Policy.

Any employee found to have engaged in retaliation shall be liable for appropriate disciplinary action, which may include a written warning, counselling, withholding of increments or promotion, suspension, or termination of employment, depending upon the gravity of the misconduct. Where the conduct also constitutes a criminal offence under applicable law, the Group may assist the aggrieved women in initiating appropriate legal proceedings.

D. Police Assistance

In case the Committee finds that the degree of offence is also **cognizable under the Indian Penal Code / Bharatiya Nyaya Sanhita (BNS), 2023**, this fact shall be mentioned in its report.

It is important to note that the proceedings under the POSH Act are independent of criminal proceedings. The IC may, at its discretion and as per the choice of the Complainant:

- Proceed with the internal inquiry as per the procedure laid down under the POSH Act; or
- It may also advise the Complainant to register complaint with the police by filing an FIR against the Respondent. The Complainant will be assisted in filing a police complaint against the Respondent if requested in writing by the Complainant.

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- The IC may continue the inquiry notwithstanding the pendency of criminal proceedings unless otherwise directed by a competent court.

E. Interim Relief

During the pendency of the inquiry, upon a written request made by the aggrieved woman, the IC may recommend to the Employer any one or more of the following interim measures:

- Transfer of either the aggrieved woman or the Respondent to another workplace;
- Grant of leave to the aggrieved woman for a period not exceeding three (3) months, in addition to her regular leave entitlement;
- Restraining the Respondent from reporting on the work performance of the aggrieved woman or writing her confidential reports, with such responsibilities assigned to another officer;
- Restraining the Respondent from contacting or communicating with the aggrieved woman during the pendency of the inquiry;
- Any other appropriate relief considered necessary to ensure a safe and non-hostile working environment.

The Employer shall implement the recommendations of the IC and report compliance to the Committee.

X. INQUIRY PROCEDURE

Where conciliation is not requested, conciliation fails, or the terms of settlement are breached by the Respondent, the IC shall conduct a formal inquiry into the complaint in accordance with the provisions of the POSH Act and POSH Rules framed thereunder, and the principles of natural justice.

A. Notice to the Respondent

Upon receipt of the complaint and after deciding to initiate a formal inquiry, the IC shall forward a copy of the complaint along with supporting documents, if any, to the Respondent within seven (7) working days.

The notice shall require the Respondent to submit a written response to the allegations within ten (10) working days from the date of receipt of the complaint. The Respondent shall also be required to furnish copies of documents, electronic records, or any other evidence relied upon, together with the names and addresses of witnesses, if any.

B. Written Reply of the Respondent

The Respondent shall submit a detailed written reply to the complaint within the prescribed time, together with all supporting documents and the list of witnesses proposed to be examined.

The IC may permit either party to file additional documents or written submissions during the course of the inquiry, where considered necessary in the interest of justice.

Failure of the Respondent to submit a written reply shall not prevent the IC from proceeding with the inquiry.

C. Conduct of Hearings

The IC shall conduct hearings in a fair, impartial and confidential manner.

The Committee shall provide both the Aggrieved Woman and the Respondent with reasonable notice of each hearing. Both parties shall be afforded adequate opportunity to present their respective cases, produce evidence, examine witnesses and respond to the material placed on record.

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The IC may hold one or more hearings depending upon the nature and complexity of the complaint. Hearings may be conducted physically or through secure virtual platforms where circumstances so require.

The parties shall ordinarily appear in person before the IC. Legal practitioners shall not be permitted to represent either party during the proceedings unless otherwise required under applicable law.

The IC may permit separate appearances of the parties wherever necessary to ensure a fair, safe and non-intimidating environment for the Aggrieved Woman.

D. Evidence

The IC shall consider all relevant evidence produced by the parties.

Evidence may include, but is not limited to:

- Written correspondence, emails, letters and office records;
- Text messages, instant messaging conversations and social media communications;
- Audio recordings, video recordings, CCTV footage and photographs, where legally obtained;
- Electronic records, call logs and other digital evidence;
- Medical records, where relevant;
- Documentary evidence maintained by the Group; and
- Any other material which the IC considers relevant and reliable.

The IC shall evaluate the evidence on the touchstone of probability, credibility and relevance, keeping in view the nature of workplace interactions and the surrounding circumstances.

Strict rules of evidence applicable to judicial proceedings shall not apply; however, the findings shall be based upon relevant material and sound reasoning.

E. Examination of Witnesses

The IC may examine witnesses produced by either party or any other person whom it considers necessary for a fair determination of the complaint.

Each witness shall provide an independent statement before the IC. The Committee may seek clarification or ask additional questions whenever required.

Where necessary, the IC may recall any witness for further clarification.

The identity and testimony of witnesses shall be treated as confidential to the extent permissible under law.

F. Principles Governing the Inquiry

The IC shall ensure that every inquiry is conducted in accordance with the following principles:

- Fairness and impartiality;
- Equal opportunity of hearing to both parties;
- Compliance with the principles of natural justice;
- Confidentiality of the proceedings;

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- Freedom from bias or conflict of interest;
- Timely completion of the inquiry.

The IC shall maintain written records of all proceedings, statements, evidence and documents received during the inquiry.

G. Principles of Natural Justice to be followed

The inquiry shall be guided by the principles of natural justice, fairness and impartiality.

Accordingly, the IC shall ensure that:

- both parties are given adequate notice of every hearing;
- both parties are provided a reasonable opportunity to present their case;
- each party is given an opportunity to submit documents, produce witnesses and explain the evidence relied upon;
- no decision is based on material that has not been disclosed to the concerned party, unless disclosure is prohibited by law;
- every finding is based upon evidence available on record and supported by reasons;
- members of the IC act fairly, independently and without bias or conflict of interest; and
- the dignity, privacy and confidentiality of all parties are maintained throughout the proceedings.

H. Non-Cooperation and Ex Parte Proceedings

The IC expects full cooperation from all parties during the inquiry and every effort shall be made to ensure the timely completion of the proceedings.

Where the Aggrieved Woman (Complainant) fails to present herself for three consecutive hearings, without sufficient cause, the IC may terminate the inquiry proceedings in respect of the complaint. However, no such termination shall be effected without giving the Aggrieved Woman not less than fifteen (15) days' prior written notice requiring her to appear before the IC.

Where the Respondent fails to present himself/herself for three consecutive hearings, without sufficient cause, the IC may proceed with the inquiry ex parte, provided that the Respondent has been given not less than fifteen (15) days' prior written notice of the proposed proceedings.

An ex parte inquiry shall not result in an automatic finding against the Respondent. The IC shall independently examine the complaint, assess the evidence placed on record, evaluate the testimony of witnesses, if any, and arrive at its findings based on the preponderance of probabilities and the material available before it.

I. Recording of Proceedings

The IC shall maintain a complete and accurate record of every hearing, including the attendance of the parties, statements of the parties and witnesses, documents and electronic evidence produced, orders passed during the inquiry, minutes of proceedings and all other material relied upon while arriving at its findings. The proceedings shall be signed by the members of the IC present and preserved in a secure and confidential manner in accordance with this Policy and applicable law.

J. Timeline of Inquiry and Submission of Report

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The IC shall endeavour to complete the inquiry within ninety (90) days from the date of receipt of the complaint, in accordance with the POSH Act.

K. Opportunity to Make Representation on the Findings

Upon completion of the inquiry and after appreciation of the oral and documentary evidence, the IC shall prepare its proposed findings.

In accordance with the second proviso to Section 11(1) of POSH Act a copy of the findings shall be made available to both the Aggrieved Woman and the Respondent, enabling them to make their written representations, if any, against the findings before the IC.

The parties shall submit their representations within such reasonable period as may be specified by the IC.

The IC shall duly consider the representations received from the parties before finalising its Inquiry Report and recording its findings and recommendations.

Where either party fails to submit a representation within the stipulated period, the IC may proceed to finalise its Inquiry Report based on the material available on record.

L. Inquiry Report and Recommendations of the IC

Upon completion of the inquiry, the IC shall prepare a reasoned Inquiry Report containing its findings, conclusions and recommendations and submit the same to the Employer within ten (10) days of completion of the inquiry.

The copies of the Final Report thereof shall be provided to both the Aggrieved Woman and the Respondent.

The Employer shall act upon the recommendations of the IC within sixty (60) days from the date of receipt of the Inquiry Report.

Where the allegations of sexual harassment are **not proved**, the IC shall recommend to the Employer that no disciplinary action is required against the Respondent and the complaint be treated as closed.

Where the allegations of sexual harassment are **proved**, the IC may recommend one or more of the following, depending upon the nature, gravity and impact of the misconduct:

- Appropriate disciplinary action against the Respondent in accordance with the Group's service rules, standing orders or terms and conditions of employment;
- Payment of compensation to the Aggrieved Woman in accordance with Section 15 of the POSH Act;
- Counselling, coaching or behavioural correction programmes for the Respondent;
- Mandatory gender sensitisation or POSH awareness training;
- Any corrective or preventive measures necessary to ensure a safe, respectful and harassment-free workplace;
- Any other recommendation considered appropriate in the facts and circumstances of the case and permissible under law.

While making its recommendations, the IC shall consider the nature and seriousness of the misconduct, the evidence on record, the impact on the Aggrieved Woman, any mitigating or aggravating circumstances, previous misconduct, if any, and the principles of proportionality and fairness.

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M. Compensation to the Aggrieved Woman

Where the IC concludes that the allegation of sexual harassment has been proved, it may recommend payment of compensation to the Aggrieved Woman in accordance with Section 15 of the POSH Act.

While determining the amount of compensation, the IC shall have due regard to the following factors:

- The mental trauma, pain, suffering and emotional distress caused to the Aggrieved Woman;
- Loss of career opportunity due to the incident of sexual harassment;
- Medical expenses incurred for physical or psychological treatment, if any;
- The income and financial status of the Respondent;
- The feasibility of payment in a lump sum or in appropriate instalments; and
- Any other relevant factor considered appropriate by the IC.

Where compensation is recommended, the Employer shall recover the amount from the salary or wages of the Respondent, where legally permissible, or take such other measures as may be permissible under applicable law for implementation of the recommendation.

The recommendation of compensation shall be in addition to, and not in substitution of, any disciplinary action recommended against the Respondent or any other legal remedy available to the Aggrieved Woman under applicable law.

N. Action by the Employer

The Employer shall act upon the recommendations of the IC within sixty (60) days of receipt of the inquiry report.

Disciplinary Action by the Employer

The Employer shall act upon the recommendations of the IC within sixty (60) days from the date of receipt of the Inquiry Report, in accordance with Section 13 of the POSH Act.

Where the allegations are proved, the Employer of the respective entity of Sudarshan Group shall implement the recommendations of the IC, which may include disciplinary action in accordance with the applicable service rules, employment contract or standing orders.

Where the allegations are not proved, the Employer shall close the matter and ensure that no adverse action is taken against either party solely on account of the complaint.

Depending upon the recommendations of the IC and the gravity of the misconduct, the disciplinary action may include one or more of the following:

- Written apology;
- Verbal or written warning;
- Counselling or mandatory behavioural correction programme;
- Censure or reprimand;
- Adverse entry in the service record, wherever applicable;
- Withholding of promotion, increment, bonus or other employment benefits;

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- Transfer to another department, location or assignment;
- Suspension from service;
- Termination of employment;
- Recovery or deduction of compensation from the salary or other dues payable to the Respondent, where permissible under law;
- Any other disciplinary action permissible under the applicable service rules, standing orders or contract of employment.

The Employer shall communicate the action taken to the IC and ensure timely implementation of the recommendations.

O. Appeal

Any person aggrieved by the recommendations or orders of the IC may prefer an appeal in accordance with Section 18 of the POSH Act and the service rules applicable to such person. Where the applicable service rules prescribe an appellate forum, the appeal shall lie before such forum in accordance with applicable law. Where the applicable service rules do not prescribe an appellate forum, the appeal may be preferred before the appellate authority prescribed under the applicable law. For employees for whom the Industrial Court is the applicable appellate forum, the appeal shall lie before the concerned Industrial Court.

XI. MALICIOUS OR FALSE COMPLAINTS

On conclusion of inquiry, if the Committee determines that:

- Allegation against the respondent is malicious, or
- Aggrieved woman or any other person who has filed the complaint, has knowingly filed a false complaint, or
- Aggrieved woman or any other person has forged any evidence or produced any misleading document

then the Committee may recommend disciplinary action against such person (Complainant), similar to the actions proposed for the respondent in case of substantiated complaints.

Important: Unless malicious intent is established, mere inability to substantiate a complaint or provide adequate proof will not attract action against the complainant. Malicious intent must be clearly established by the IC after giving the complainant an opportunity of being heard, through a separate inquiry.

XII. THIRD PARTY HARASSMENT

Where sexual harassment occurs because of an act or omission by any **third party or outsider** (client, vendor, customer, contractor) while on official duty:

- The respective entity shall take all steps necessary and reasonable to assist the affected person
- Support shall be provided in terms of preventive action and assistance
- The entity shall assist the complainant in filing a police complaint, if desired
- Action shall be taken against the third party contractor as per contract terms
- If a third party is the complainant, the respondent's employer must investigate the complaint or report it to the police as appropriate

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XIII. RESIGNATION OR RETIREMENT OF THE RESPONDENT DURING PENDENCY OF INQUIRY

The resignation, retirement or cessation of employment of the Respondent during the pendency of the inquiry shall not, by itself, render the proceedings infructuous or absolve the Respondent from the allegations under inquiry.

The IC may, subject to the provisions of the POSH Act, applicable service rules and the facts and circumstances of the case, continue and conclude the inquiry and submit its findings and recommendations to the Employer.

Where the Respondent tenders resignation during the pendency of the inquiry, the Employer may, to the extent permissible under applicable law, the terms and conditions of employment and the Group's service rules, defer acceptance of such resignation until the inquiry is concluded and appropriate action, if any, is taken on the recommendations of the IC.

Nothing contained herein shall prejudice the Employer's right to take such action as may be permissible under law upon receipt of the findings and recommendations of the IC.

XIV. CONFIDENTIALITY

The Group, the Employer, the IC and all persons connected with the complaint, inquiry or implementation of the recommendations shall maintain strict confidentiality throughout the proceedings in accordance with Section 16 of the POSH Act.

No person shall publish, communicate or make known to the public, press, media or any other person, in any manner whatsoever, the following information:

- The contents of the complaint;
- The identity and addresses of the Aggrieved Woman, the Respondent and the witnesses;
- Any information relating to the conciliation or inquiry proceedings;
- The recommendations of the IC;
- The action taken by the Employer pursuant to the recommendations of the IC; or
- Any other information which may directly or indirectly disclose the identity of the Aggrieved Woman, the Respondent or the witnesses.

Nothing contained in this clause shall prevent the dissemination of information regarding the justice secured to any victim of sexual harassment for the purpose of creating awareness, provided that the name, address, identity or any other particulars likely to lead to the identification of the Aggrieved Woman, the Respondent or the witnesses are not disclosed.

Every member of the IC, the parties to the complaint, witnesses, representatives of the Management, Human Resources personnel and any other person associated with the complaint or inquiry shall maintain strict confidentiality of all information received or generated during the proceedings.

Any person who contravenes the provisions relating to confidentiality under the POSH Act or this Policy shall be liable for appropriate disciplinary action in accordance with the applicable service rules, standing orders, terms and conditions of employment and the provisions of the POSH Act, in addition to any other action permissible under law.

Electronic records relating to complaints, inquiry proceedings, reports and recommendations shall be maintained in a secure manner with restricted access only to authorized persons on a need-to-know basis.

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XV. DUTIES OF THE EMPLOYER AND THE COMMITTEES

Duty	Description
Safe Environment	Provision of safe and healthy working environment at all workplaces
Confidentiality	All information received shall be kept confidential
Documentation	All information shall be kept complete and accurate including settlement, investigation, report, and resolution
Public Awareness	Public display of penal consequences of sexual harassment at notice boards of all locations including order constituting ICs under Section 4(1)
Workshops	Conduct workshops and awareness programs sensitizing employees at regular intervals
Assistance to Complainant	Provide maximum protection against victimization, retaliation, and embarrassment
Police Assistance	Assist the complainant in filing a police complaint, if desired
Committee Training	Provide regular training to members of Governance Committee and Location ICs
Annual Reporting to District Officer	The Governance Committee shall ensure that the annual report is submitted to the District Officer as required under the POSH Act.
Quarterly Meetings	The Location ICs shall hold a meeting on a quarterly basis irrespective of any complaint or proceeding and record the Minutes of the meetings

XVI. DIRECTIVE PRINCIPLES

[Note: "Directive Principles" as used in this Policy refer to guiding principles for implementation and are not legally binding provisions.]

- The management shall provide all necessary assistance and resources for ensuring full, effective, and speedy implementation of this policy
- Any non-compliance with this policy may be reported to the Governance committee
- **[The common Presiding Officer (Madhuri Sanas) and External Member (Adv. Ujwala Kadrekar) across all Location ICs ensure that all enquiries are conducted with uniformity, consistency, and fair practices.]**

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XVII. TRAINING AND AWARENESS

Regular awareness sessions shall be conducted for all employees across all the entities and all locations. The following shall be covered:

- Provisions of the POSH Act.
- Consequences of sexual harassment
- Process of filing a complaint
- Confidentiality and non-retaliation
- Role and contact details of Location ICs and Governance Committee (Lead Committee)
- What constitutes sexual harassment (with examples)
- How to report incidents

Internal Trainers shall be nominated for each location to conduct periodic sensitization programs. The **Governance Committee** shall oversee the training calendar and content.

XVIII. RECORDS AND DOCUMENTATION

Record	Description
Complaint Register	Register of all complaints received (location-wise and central)
Minutes	Minutes of all Committee meetings
Inquiry Reports	Complete inquiry reports and findings
Settlement Records	Records of conciliation/settlement (if any)
Action Taken	Action taken by management
Annual Reports	Annual reports from each Location IC to the Governance Committee

The Human Resources Department of each entity, in coordination with the respective Committees, shall maintain: All records shall be kept **confidential** and preserved for a minimum period of **5 years** from the date of commencement of the complaint, irrespective of the fact whether the complainant or respondent are in the job or have moved on from the organization.

XIX. ANNUAL REPORTING

Location IC Reporting:

Each Location IC shall submit its Annual Report to the Employer in accordance with the POSH Act and provide a copy to the Governance Committee for consolidation of Group-level compliance by **31st January** of each year, covering:

- Number of complaints received during the previous calendar year
- Number of inquiries completed
- Nature of action taken
- Awareness programs conducted at that location

Governance Committee Reporting:

The Governance Committee shall submit a **consolidated annual report** to the **Managing Director** of each entity by **28th February** of each year, covering the above information for all locations and entities.

Further, the Governance Committee shall ensure that the annual report is submitted to the **District Officer** as required under the POSH Act, POSH Act.

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XX. CAUTIONARY STATEMENT

Sudarshan Chemical Group reserves the right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendments or modification will be binding on the employees unless the same is notified to the employees through intranet. Anyone who doesn't have access to an intranet can contact the HR department for a copy of the policy.

XXI. APPROVING AUTHORITY

Head - People Practices & Managing Director (or equivalent position in the respective entity) will be the approving authority for any changes to implement to the policy.

XXII. NOTE

For Further Insight on "**The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, POSH Act**" please visit the official government website or contact the HR department.

ANNEXURE A – DESCRIPTION OF IC

Location IC Contact Details

Note: The Presiding Officer (Madhuri Sanas) and External Member (Adv. Ujwala Kadrekar) are the **same** across all locations. Only internal members are location-specific.

Common POSH Email ID for filing complaints: posh@sudarshan.com

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Location 1: GHO IC and all Sales offices [India]

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Mrunal Patil	Member	+91 8956326915	mapatil1@sudarshan.com
Shrinidhi Deopujari	Member	+91 7758990565	ssdeopujari@sudarshan.com
Rahul Parasar	Member	+91 9575302919	rbparasar@sudarshan.com
Akshat Sanghal	Member	+91 9818023232	asangal@sudarshan.com
Ankita Sali	Member	+91 7058676435	ankitasali@sudarshan.com

Location 2: Juinagar (Sudarshan Colorants India Limited)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Apoorva Natu	Member	+91 9075084620	aanatu@sudarshan.com
Poonam Gupta	Member	+91 9833788801	poonam.gupta@heubach.com
Vijayant	Member	+91 8605002774	vijayant.s@heubach.com
Ali Harawala	Member	+91 9702730909	alisagar.hararwala@heubach.com

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Location 3: Roha I (Sudarshan Chemical Industries Ltd.)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Shantaram Sonwane	Member	+91 9881308429	sssonawane@sudarshan.com
Sakshi Ingawale	Member	+91 9422353487	ssingawale@sudarshan.com
Manish Kamble	Member	+91 8956688441	mmkamble@sudarshan.com
Pooja Chaudhari	Member	+91 8956152373	pschaudhari1@sudarshan.com
Vilas Bhalerao	Member	+91 7758056879	vsbhalerao@sudarshan.com
Prarthana Behekar	Member	+91 7558669204	2800214@sudarshan.com

Location 4: Mahad (Sudarshan Chemical Industries Ltd.)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Sandeep Kashid	Member	+91 86003 62287	sakashid@sudarshan.com
Manisha Barge	Member	+91 96654 04741	msbarge@sudarshan.com
Saiprasad Sansare	Member	+91 8956071437	smsansare@sudarshan.com
Rushali Pawar	Member	+91 9356426062	3800046@sudarshan.com

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Location 5: Sutarwadi (Sudarshan Chemical Industries Ltd.)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Mrunal Patil	Member	+91 8956326915	mapatil1@sudarshan.com
Suvarna Kasture	Member	+91 96230 18249	smkasture@sudarshan.com
Ayurshi Arun Keche	Member	+91 70380 70244	aakeche@sudarshan.com
Dinesh Jha	Member	+91 99229 93350	djha@sudarshan.com

Location 6: Roha II (Sudarshan Colorants India Limited)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Vishal Ghorpade	Member	+91 9822880889	vrghorpade@sudarshan.com
Poonam Gupta	Member	+91 9833788801	poonam.gupta@heubach.com
Sandeep Vartak	Member	+91 9028703421	sandeep.vartak@heubach.com
Priyanka Patil	Member	+91 9594036208	priyanka.patil@heubach.com

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Location 7: Nagda (Sudarshan Colorants India Limited)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Poonam Gupta	Member	+91 9833788801	poonam.gupta@heubach.com
Vijayant	Member	+91 8605002774	vijayant.s@heubach.com
Dattatraya Khedkar	Member	+91 7767060210	dattatray.khedkar@heubach.com

Location 8: Cuddalore (Sudarshan Colorants India Limited)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Apoorva Natu	Member	+91 9075084620	aanatu@sudarshan.com
Vijayant	Member	+91 8605002774	vijayant.s@heubach.com
Ramamoorthy A.	Member	+91 8754028404	ramamoorthy.arumugam@heubach.com
Sivanesan P	Member	+91 9994310901	p.sivanesan@heubach.com

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Location 9: Baroda (Sudarshan Gujarat MFG Pvt Ltd)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Annamma Philip	Member	+91 9879540818	annamma.philip@heubach.com
Pankti Shah	Member	+91 9687303344	pankti.shah@heubach.com
Nikisha Desai	Member	+91 9909015724	nikisha.desai@heubach.com
Hetal Bakre	Member	+91 9879533475	hetal.bakre@heubach.com

Location 10: Ankleshwar I/II/III (Sudarshan Gujarat MFG Pvt Ltd)

Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Anita Bahekar	Member	+91 7069040142	anita.bahekar@heubach.com
Hetalkumar Bakre	Member	+91 9879533475	hetal.bakre@heubach.com
Annamma Philip	Member	+91 9879540818	annamma.philip@heubach.com
Jasvant Sevak	Member	+91 9879106952	jashvant.sevak@heubach.com

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Name	Role	Contact Number	Email ID
Madhuri Sanas	Presiding Officer	+91 9623056871	mdsanas@sudarshan.com
Adv. Ujwala Kadrekar	External Member	+91 9969778522	ujwalahemant@gmail.com
Annamma Philip	Member	+91 9879540818	annamma.philip@heubach.com
Atul Bopche	Member	+91 9823805026	atul2.bopche@heubach.com
Hardip Shah	Member	+91 7069800783	hardip.shah@heubach.com
Anita Bahekar	Member	+91 7069040142	anita.bahekar@heubach.com

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Standard #: C/POSH-P/08	Revision #01	Effective date: 1st April 2026	Supersedes Standard: C/POSH-P/08/00	Next Review Date: 1st April 2029

EMPLOYEE ACKNOWLEDGEMENT FORM

Sudarshan Group – Prevention of Sexual Harassment (POSH) Policy

I, the undersigned, hereby acknowledge that:

1. I have received, read, and understood the **Sudarshan Group Policy on Prevention of Sexual Harassment at Workplace**.
2. I understand that the Policy applies to my employment with the following entity (tick applicable):
 - ☐ Sudarshan Chemical Industries Limited (SCIL)
 - ☐ Sudarshan Colorant India Limited
 - ☐ Sudarshan Gujarat Manufacturing Private Limited (SGMPL)
 - ☐ Sudarshan Dahej MFG Private Limited
3. I understand the **two-tier committee structure**:
 - ☐ **Governance Committee**– The apex committee at Group level led by Madhuri Sanas (Presiding Officer) and Adv. Ujwala Kadrekar (External Member)
 - ☐ **Location IC** – Site-wise Committee at my location with the same Presiding Officer and External Member
 - ☐ I know which committee to approach based on the jurisdiction outlined in the policy.
4. I am aware that complaints can be filed through the common POSH email ID: posh@sudarshan.com
5. I agree to abide by the Policy and understand that any violation may lead to disciplinary action, including termination of employment.
6. I am aware that confidentiality and non-retaliation are strictly enforced.
7. I am aware of the **SHE-Box** portal as an additional mechanism for lodging complaints.

Name		Designation	
Emp Code		Department	
Entity			
Signature	Date	Place	

Prepared By	Reviewed By	Approved By
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