

INDOBELL INSULATIONS LIMITED

POLICY OF PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT (POSH)

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Approved By: Board of Directors

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1. INTRODUCTION TO THE POLICY:

Indobell Insulations Limited (“the Company”) is committed to create and maintain a secure work environment where its Employees, Agents, Vendors and others can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and also covers other locations directly related to the Company's business.

This Prevention of Sexual Harassment Policy is formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”), and establishes a framework to prevent, prohibit, and address incidents of sexual harassment at the workplace. This Policy is intended to be comprehensive and shall be read in conjunction with the provisions of the POSH Act, 2013. In the event of any inconsistency, ambiguity, or conflict between this Policy and the POSH Act, the provisions of the POSH Act shall prevail.

While the POSH Act specifically provides protection to women, the Company is committed to maintaining a workplace free from harassment for all employees, irrespective of gender. Accordingly, this Policy adopts a gender-neutral approach in promoting respectful conduct and addressing workplace concerns.

2. SCOPE:

Company Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every employees, workers, volunteers, probationers and trainees including those on deputation, part time, contract, working as consultants or otherwise (whether in the office premises or outside while on assignment), irrespective of gender. This policy shall be considered to be a part of the employment contract or terms of engagement of the persons in the above categories. The Policy shall also be applicable to all third parties such as visitors, clients, customers, contractors, service providers, and any other person authorized to be present within the premises/workplace of the company.

Where the alleged incident occurs to the company’s employee by a third party while on a duty outside our premises, the Company shall perform all reasonable and necessary steps to support our employee.

The Company encourages everyone who believes they are sexually harassed to use the Redressal mechanism as provided in this policy.

The Company will also not tolerate sexual harassment whether engaged in by fellow employees, supervisors, clients or suppliers.

3. DEFINITIONS:

For the purposes of this Policy, unless the context otherwise requires:

(a) “Aggrieved individual” means,

(i) in relation to a workplace, an individual, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

(b) “Complainant” means the aggrieved Individual who files a complaint of sexual harassment under this Policy, or any person filing the complaint on behalf of the aggrieved Individual in cases where the aggrieved Individual is unable to do so due to physical or mental incapacity, death, or any other valid reason, in accordance with the provisions of the POSH Act.

(c) “Employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

(d) “Employer” means, in relation to the workplace, any person responsible for the management, supervision and control of the workplace, and includes the person or board or committee responsible for formulation and administration of policies for the organisation and the person discharging contractual obligations with respect to employees.

(e) The “Company” means Indobell Insulations Limited.

(f) “IC Committee” means a committee constituted by the Company for the purpose of dealing with all matters in relation to sexual harassment. In pursuance with the Sexual Harassment of Women at Workplace (prevention, Prohibition and Redressal) Act, 2013 & its Rules, an Internal Complaints Committee (ICC) has been constituted to redress complaints of sexual harassment at the workplace.

(g) “Presiding Officer” means the Presiding Officer of the Internal Committee nominated under Section 4(2) of the POSH Act.

(h) “Respondent” means a person against whom the aggrieved individual has made a complaint.

(i) “Sexual harassment” includes any one or more of the unwelcome acts or behavior (whether directly or by implication), as mentioned in section 4 of this Policy.

(j) “Workplace” includes,

(i) Premises, locations, establishments, enterprises, institutions, offices, branches or units established,

owned, and controlled by the Company.

(ii) Places visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

(k) “Local Committee” means a committee constituted by the District Magistrate of the District so as to enable women in the unorganized sector or small establishments to work in an environment free of sexual harassment.

(l) “Ex-parte” refers to a situation where a decision or inquiry proceeds with only one-party present because the other party has failed to appear despite being duly notified.

4. PREVENTION OF SEXUAL HARASSMENT:

(a) No individual shall be subjected to sexual harassment at any workplace.

(b) Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), namely,

(i) physical contact and advances, including touching, brushing, molestation, stalking, leering or ogling.

(ii) a demand or request for sexual favors, whether verbal or non-verbal, including requests in exchange for employment benefits, promotion, assignment, travel, favorable working conditions or evaluation.

(iii) making sexually colored remarks, including vulgar or indecent jokes, taunts, innuendos, comments on appearance, dressing or personal life, or sexually suggestive comments (oral, written or electronic).

(iv) Showing or displaying pornography or sexually explicit material, including pictures, messages, graffiti, digital content or electronic transmission.

(v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature, including persistent unwanted attention, offensive gestures, unwelcome communication through phone, text, email, video call or other electronic means, or conduct which intrudes upon privacy or offends dignity.

(c) The following circumstances, among other circumstances, if occurring or present in relation to or connected with any act or behavior of sexual harassment, may amount to sexual harassment at the workplace:

(i) implied or explicit promise of preferential treatment in his/her employment.

(ii) implied or explicit threat of detrimental treatment in his/her employment.

(iii) implied or explicit threat about his/her present or future employment status.

(iv) interference with his/her work or creating an intimidating or offensive or hostile work

environment for him/her.

(v) humiliating treatment likely to affect his/her health or safety.

(d) For the purposes of this Policy, conduct shall constitute sexual harassment where such conduct is unwelcome, unwanted, uninvited or offensive to the aggrieved individual and adversely affects his/her dignity, employment, or creates a hostile work environment, whether occurring at the office premises, at any place visited during the course of employment including client premises, business travel, official events, or through electronic or virtual means including work-from-home arrangements.

(e) The respondent may be any person at the workplace, including but not limited to supervisor, subordinate, co-worker, trainee, contractor, vendor, consultant, agent, or any person having professional interaction with the aggrieved individual in connection with employment.

5. INTERNAL COMPLAINTS COMMITTEE (ICC):

The Internal Complaints Committee has been constituted of the following members as nominated by the Company.

- a. A female employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- b. Not less than 2 members from amongst employees preferably committed to the cause of female OR who have had experience in social work OR have legal knowledge.
- c. One member shall be from amongst Non-governmental organizations OR associations committed to the cause of female OR a person familiar with the issues relating to sexual harassment.

At least half of the total members of the Committee have to be female. The Committee members and HR representatives will be provided with necessary training inputs to handle such issues effectively and with the required sensitivity and concern.

The details of the IC Committee members are as follows:

Name	Designation in ICC
Mrs. Soma Bhattacharjee	Presiding Officer
Mrs. Sonam Agarwal	Member

Ms. Sanjukta Banerjee	Member
Mrs. Shaila Jassal	External Member

The IC Committee shall:

- a) Receive complaints of sexual harassment at the workplace.
- b) Inquire into and make recommendations on such complaints.
- c) Ensure a fair and confidential redressal process for the complainant and the respondent.
- d) Maintain strict confidentiality throughout the process
- e) Prepare an annual report, which will include:
 - i. Number of complaints received that year.
 - ii. Number of complaints disposed of/resolved during that year.
 - iii. Number of workshops or awareness programs conducted.
 - iv. Number of cases pending for more than (90) ninety days.
 - v. Nature of action taken by the employer

The Committee meets as required and ensures compliance with all provisions laid down in the law.

Additionally, the employer shall include in the Annual Report of the Company the number of cases of sexual harassment filed during the year, if any, and their disposal, in accordance with the provisions of the POSH Act, 2013.

The Committee will initiate inquire in the following cases:

- Ø No conciliation is requested by aggrieved person
- Ø Conciliation has not resulted in any settlement

Complainant informs the committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent.

5.1 ICC MEETINGS AND TIMELINES:

The Internal Complaints Committee (IC Committee) shall convene meetings under the following circumstances:

(a) Upon Receipt of a Complaint

The ICC must meet promptly after receiving a written complaint to initiate the inquiry process.

(b) During the Inquiry

The ICC may hold multiple meetings to collect statements, examine evidence, question witnesses, and ensure due process.

(c) Conciliation

If the complainant requests conciliation before the inquiry begins, a meeting must be held with both parties present. No monetary settlement is permitted under conciliation.

(d) Annual Review Meeting

The ICC should meet at least once every year to review its performance, compile the Annual Report, and evaluate the preventive environment in the company.

(e) Tenure

The Presiding Officer and every Member of the IC Committee shall hold office for such a period, not exceeding three years, as may be specified by the employer.

5.2 POWERS OF THE IC COMMITTEE:

For the purpose of making an inquiry under this Policy, the IC Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908, while trying a suit, in respect of the following matters:

- a) summoning and enforcing the attendance of any person and examining him or her on oath.
- b) requiring the discovery and production of documents.
- c) call for information, examine witnesses, and take all necessary steps to ensure a fair and impartial inquiry.
- d) any other matter which may be prescribed.

The IC Committee shall also be empowered to make recommendations to the employer in accordance with Sections 12 and 13 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

6. COMPLAINT & REDRESSAL:

6.1 COMPLAINT OF SEXUAL HARASSMENT:

If, in the course of your employment with the Company, an individual experience any form of sexual harassment as outlined in Section 4.0, he/she is encouraged to file a written complaint at the earliest. Every complaint will be taken seriously, and the Company will maintain strict confidentiality throughout the process. The Company follows a zero-tolerance approach towards proven cases of sexual harassment.

Any aggrieved individual may make, in writing, a complaint of sexual harassment at workplace to the IC Committee within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.

The IC can extend the time by another three (3) months, where the complainant shows sufficient reason for the delay.

If the complainant is unable to make the complaint in writing, the Presiding Officer or any member of the Internal Committee shall provide reasonable assistance in reducing the complaint to writing.

Where the complainant is unable to file the complaint due to physical or mental incapacity, death, or any other valid reason, the complaint may be filed on her behalf by a relative, friend, co-worker, an officer of the National or State Commission for Women, a special educator, psychologist/psychiatrist, guardian, or any person having knowledge of the incident with the written consent of the complainant, or by the legal heir in case of death.

The form in which the complaint is required to be made is annexed as FORM-1 to the Policy. This form will be available with the IC Committee and can also be downloaded from our website (www.indobell.com). However, any written complaint received in any form other than the form prescribed shall also be accepted. The complaint shall be submitted to the IC Committee electronically at (posh@indobell.com).

Procedure of Filing a complaint:

Copy of complaint along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee at posh@indobell.com.

It must contain these Four (4) things:

Ø Date(s)

Ø Timings

Ø Respondent's Name

Ø Parties working relationships

Note: The form is attached as Annexure-I to this Policy.

6.2 CONCILIATION:

The IC Committee may, before initiating an inquiry, and at the request of the aggrieved individual take steps to settle the matter between him/her and the respondent through conciliation:

- (a) Provided that no monetary settlement shall be made as a basis of conciliation.
- (b) Where a settlement has been arrived at, the IC Committee shall record the settlement that arrived and forward the same to the employer.
- (c) The IC Committee shall provide the copies of the settlement as recorded during conciliation to the aggrieved employee and the respondent.
- (d) Upon a conciliation being reached, the IC Committee would not be required to conduct any further inquiry.
- (e) If the matter has been settled by conciliation but the respondent is not complying with the terms and conditions, the aggrieved party can approach the IC Committee for Redressal.

It can be initiated only at the request in writing by the complainant.

6.3 INQUIRY INTO COMPLAINT:

Subject to the provisions of Section 11 of the POSH act, the IC Committee shall, where the respondent is an employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondent.

A copy of the complaint shall be shared with the respondent within **seven working days** of its receipt, informing him/her of the details of the allegation and the name of the complainant, and the respondent

shall submit a written reply, along with his/her list of supporting documents and witnesses (if any), within **ten working days** thereafter.

If either party fails to appear before the IC Committee for three consecutive hearings without sufficient cause, the IC Committee may proceed with the inquiry ex-parte after providing a written notice of at least **fifteen days** to the concerned party.

The IC Committee may conduct meetings, hearings, or witness examinations through video conferencing or other electronic means where physical presence is not feasible, while ensuring confidentiality, fairness, and adherence to the principles of natural justice.

A minimum of three members of the IC Committee, including the Presiding Officer and the External Member, shall be present during the conduct of inquiry proceedings.

The complainant and the respondent shall not be permitted to be represented by a legal practitioner or lawyer during the proceedings before the IC Committee.

The IC Committee shall complete the inquiry within a period of **ninety days** of the receipt of the complaint. The complainant and the respondent shall be informed of the outcome of the investigation. The IC Committee shall ensure that both parties are provided a fair opportunity to present their case in accordance with the principles of natural justice.

6.4 INTERIM RELIEF DURING PENDENCY OF INQUIRY:

During the pendency of the inquiry, the complainant has the option to seek transfer or leave so that the inquiry process can continue smoothly and to prevent recurrence of similar situations or discomfort to the complainant. The leave can extend for a maximum period of **3 months**. Leave granted under this provision will be paid leave and will not be counted in the number of leaves that the complainant is statutorily entitled to. The complainant may be required to work from home, if it is practicable, keeping in mind the nature of work of the complainant, and their health and mental condition.

The IC Committee may also recommend appropriate interim relief, provided such relief has been requested by the Complainant. Such interim measures may include restraining the Respondent from directly supervising or evaluating the Complainant's work performance, assigning these responsibilities to another officer, or any other measure deemed appropriate to ensure a fair and safe working environment during the course of the inquiry.

However, the complainant is under a good faith obligation and shall not abuse the process to request unjustifiably long periods of leave, keeping in mind the economic effects of the leave to the organization. The IC Committee shall have the discretion to recommend to the employer to grant

leave of an appropriate duration, depending on the facts and circumstances of the case, or grant an alternate measure such as transferring the employee or the respondent, as it deems fit.

6.5 INQUIRY REPORT:

On the completion of an inquiry, the IC Committee shall provide a report of its findings to the employer within a period of **ten days** from the date of completion of the inquiry.

The employer shall act upon the recommendation within **sixty days** of its receipt.

6.6 DISCIPLINARY ACTION:

Where the IC Committee, upon completion of the inquiry, arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take action for sexual harassment as a misconduct in accordance with the applicable service rules or terms of employment.

Such action may include, but shall not be limited to, written apology, warning, reprimand, censure, withholding of promotion or increment, deduction from the salary or wages, suspension, transfer, termination of service, or any other disciplinary action as deemed appropriate.

Such disciplinary action shall be in addition to any legal recourse available to the aggrieved individual under applicable law.

However, where the IC Committee concludes that the allegation has not been proved, it shall recommend that no action is required to be taken against the respondent.

7. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT:

Where the IC Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved individual has made the complaint knowing it to be false or has produced forged or misleading document, it may recommend to the employer to take action against the individual in accordance with the provisions of the applicable service rules or as prescribed under applicable law.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. Further, the malicious intent on part of the complainant needs to be established through the inquiry process before any action against such a complainant is recommended by the IC Committee.

8. CONFIDENTIALITY:

The contents of the complaint, the identity and addresses of the aggrieved individual/complainant, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the IC Committee and the action taken shall not be published, communicated or made known to the public, press and media in any manner.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the Act. Each party having the knowledge of the case (including the respondent and complainant) shall maintain and be bound by the confidentiality of the incident.

9. NON-RETALIATION:

The Company shall not accept, support, or tolerate retaliation in any form against any person who, acting in good faith, reports sexual harassment, raises concerns, provides information, or assists in an inquiry. No complainant, witness, or person participating in the proceedings shall be subjected to victimisation, unwarranted pressure, discriminatory treatment, or retaliatory conduct during or after the inquiry. Any such conduct shall be treated as misconduct and shall attract appropriate disciplinary action.

10. APPEAL:

Any person aggrieved from the recommendations made under this Policy or non-implementation thereof may prefer an appeal in accordance with the service rules applicable or before the appropriate court or tribunal or to the District Officer of the Local Committee, within **ninety days** of the recommendations.

If the Complaint is against the employer himself or any member of the IC committee, complaints may be filed before the District Officer of the Local Committee.

If the employer is unable to recover the amount of compensation from the respondent, employer shall forward the Inquiry Report to the District Officer of the Local Committee.

11. DUTIES OF EMPLOYER:

The employer shall,

- (a) provide a safe working environment at the workplace.
- (b) display at any conspicuous place in the workplace, the penal consequences of sexual harassment.

- (c) Organise workshops and awareness programmes/ POSH training at least once a year.
- (d) disseminate this Policy to all employees, including new recruits, and obtain their acknowledgment.
- (e) provide necessary facilities to the IC Committee.
- (f) assist in securing attendance of respondents and witnesses.
- (g) make available information required by the IC Committee.
- (h) provide assistance if the individual chooses to file a complaint under IPC.
- (i) treat sexual harassment as misconduct.
- (j) ensure timely submission of reports by the IC Committee.
- (k) review the implementation of this Policy periodically and ensure compliance with the provisions of the POSH Act and applicable Rules.

12. MONITORING, REVIEW & AMENDMENTS:

The Human Resource Department (HR) will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

13. ANNEXURE:

13.1 COMPLAINT REDRESSAL TIMELINE AT A GLANCE:

S. No	Action Point	Authority / Concerned Person(s)	Time Limit
1	Complaint	Complaint to be lodged by the aggrieved before Internal Committee (IC)	1. Within 3 months from the date of the incident. 2. In case of a series of incidents, within 3 months from the date of the last incident.

2	Initiation of Inquiry Proceedings	By the Internal Committee (IC), by sending a copy of the complaint to the respondent	Within 7 working days of receipt of the complaint by the IC
3	Response by the respondent along with list of documents and witnesses (if any)	To the Internal Committee (IC)	Within 10 working days from receipt of the complaint forwarded by the IC.
4	Completion of Inquiry Proceedings	By Internal Committee (IC)	Within 90 days from the date of receipt of the complaint
5	Submission of Inquiry Report and Findings along with Recommendations	To the employer by the Internal Committee	Within 10 days of completion of inquiry proceedings
6	Implementation of Recommendations in the Inquiry Report	By the employer	Within 60 days of receipt of the recommendations made in the Inquiry Report by the IC
7	Appeal	By the aggrieved	Within 90 days of receipt of recommendations by the IC

INDOBELL INSULATIONS LIMITED

FORM-1

POSH COMPLAINT FORM

(Prevention of Sexual Harassment at Workplace)

Indobell Insulations Limited

1. DETAILS OF THE AGGRIEVED INDIVIDUAL

Field	Details
Name	
Employee ID (if applicable)	
Designation	
Department / Division	
Employment Type	<input type="checkbox"/> Permanent <input type="checkbox"/> Contract <input type="checkbox"/> Trainee <input type="checkbox"/> Consultant <input type="checkbox"/> Intern <input type="checkbox"/> Visitor
Office Location	
Contact Number	
Email ID	
Residential Address	

2. DETAILS OF THE COMPLAINANT

(Complete only if the complainant is different from the aggrieved individual)

Field	Details
Name	
Relationship with Aggrieved Individual	
Contact Number	
Email ID	
Address	

3. DETAILS OF THE RESPONDENT

(Person against whom the complaint is made)

Field	Details
Name	
Designation / Position	
Department / Organisation	
Work Location	
Contact Details (if known)	

4. DETAILS OF THE INCIDENT(S)

Date of Incident	Time	Location (Office / Client Site / Travel / Virtual / Other)

Description of the Incident(s):

(Please describe the incident clearly, including the sequence of events below:)

5. WITNESSES (IF ANY)

Name	Designation / Relationship	Contact Details

6. SUPPORTING EVIDENCE (IF AVAILABLE)

Please tick and attach copies where available:

- E-mails
- Messages / Chats (WhatsApp, Teams, etc.)
- Photos / Videos
- Audio Recordings
- Documents
- Screenshots
- Other: _____

7. PREVIOUS REPORTING

Have you reported this incident earlier to anyone?

- Yes
- No

If **Yes**, please provide details:

Name of Person Reported To	Designation	Date of Reporting	Action Taken (if any)

8. RELIEF OR SUPPORT REQUESTED DURING INQUIRY

Please indicate if you require any interim support:

- Change of Reporting Manager
- Leave during Inquiry (up to 3 months)
- Work from Home
- Restriction on Interaction with Respondent
- Counselling Support
- Others (please specify): _____

9. ADDITIONAL INFORMATION

Please provide any additional information that may assist the Internal Committee (below).

10. REQUEST FOR CONCILIATION

- Yes, I request the Internal Committee to attempt conciliation with the Respondent.
- No, I wish the Internal Committee to proceed with a formal inquiry.

If Yes, please briefly indicate the relief or outcome you seek through conciliation (non-monetary):

Signature of Complainant: _____

Date: _____

10. DECLARATION

I hereby declare that the information provided above is true and correct to the best of my knowledge and belief. I understand that the information will be treated confidentially and will be used only for the purpose of inquiry under the POSH Policy.

Signature of Aggrieved Individual / Complainant

Name:

Date:

Place:

FOR INTERNAL COMMITTEE USE ONLY

Field	Details
Complaint Received By	
Name of IC Member	
Date of Receipt	
Mode of Receipt	<input type="checkbox"/> Email <input type="checkbox"/> Physical Submission <input type="checkbox"/> Other
Complaint Reference Number	
ICC Meeting Date	