



POSH Policy

(Prevention of Sexual Harassment at Workplace)

(Prevention Prohibition Redressal Act 2013)

Rossari Biotech Limited Rossari House, Golden Oak, LBS Marg, Surya Nagar, Vikhroli (West), Mumbai -
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Effective Date	01-Jan-2026
Version	1.1

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Prevention of Sexual Harassment

1. Policy Purpose & Objective:

At **ROSSARI Group (means and include Rossari Biotech Limited and its holding, subsidiary, affiliate, associate and group companies)** (hereinafter referred to as "the Company"), we are committed to providing a safe, secure, and inclusive workplace where all employees are treated with dignity and respect. This policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 ("POSH Act") to prevent and address instances of sexual harassment. The company has its corporate office situated at Rossari Biotech Limited Rossari House, Golden Oak, LBS Marg, Surya Nagar, Vikhroli (West), Mumbai - 400079, Maharashtra, India.

Policy Purpose:

The company is an equal opportunity company and is committed to creating healthy working environment that enables employees to work without fear of prejudice, gender bias and harassment free environment for all employees with regard to caste, religion, sex, gender, colour, ancestry, marital status, nationality, ethnic origin or disability. The company also believes that all employees of the company have the right to be treated with dignity. The purpose of this policy clearly state that the any offence which falls under POSH act is a grave offence and is therefore punishable under law. Harassment of any kind, whether verbal, physical, visual, or online, will not be tolerated.

1.1 Objective:

The Company is committed to the United Nations Sustainability Development Goals (UNSDGs) **Goal 10.2 and Goal 10.3 viz**

- By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status and
- Ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard and hence committed to the "Sexual harassment of women at work place (Prevention Prohibition and Redressal) act, 2013" and aims to create a secure work environment where all its stakeholders such as employees, agents, clients, vendors, partners can work and pursue the company in an atmosphere free from any sexual harassment, exploitation and intimidation. The company value every employee working with them and is committed to protecting their dignity and self-respect. Further the company is determined to maintain personal dignity, promote working environment where all genders complement each other as equal and strive for equality. The company has a zero-tolerance policy for any act of Sexual harassment of any kind and any act of the suppressing or distortion of such facts or evidence and retaliation. The Company is committed to providing a safe, respectful, and inclusive workplace that promotes equality, opportunity, and professional growth.

2. Background:

This policy has been framed in accordance with the provisions of “The sexual harassment of Women at Workplace (Prevention Prohibition and Redressal) Act 2013 and rules framed thereunder (hereinafter “The Act”). Accordingly, while the policy covers all the key aspects of the Act or any further clarification reference shall always be made to the act and the provisions of the act shall prevail. If any aspect relating to sexual harassment not explicitly covered in this policy is provided for by the law, then the law will be applicable. In case of any conflict between the policy and law, the law will prevail.

3. Scope & Applicability:

3.1 Company is committed to maintaining a safe, respectful, and inclusive environment for all employees, customers, and stakeholders. This policy also applies to contractors, vendors, clients, and any individuals associated that covers interactions in the workplace, at company-sponsored events, during business travel, and on digital communication platforms related to work.

3.2 This policy applies to: All Women employees in the organization including , permanent, temporary, contractual, and consultants, and service providers deployed on the premises. The policy covers such acts occurred within the premises which are within the organization’s control. The workplace, including but not limited to the office premises, company-related events, and any location visited by employees during the course of employment and also online (virtual) platforms used during the course of employment and work from home settings where employees are allowed to work from home.

4. Definitions:

4.1 Aggrieved women/Complainant:

Women of any age who files a complaint of sexual harassment at the workplace to the Internal Committee against another person refer as Respondent under the POSH act.

4.2 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.

4.3 Employer:

means any person responsible for the management, supervision, and control of the workplace. Management includes the person or board or committee responsible for the formulation, implementation, and administration of policies.

4.4 Internal Committee (IC):

means a committee constituted by the company as per this Policy and includes all locations.

4.5 Presiding Officer:

means the Presiding Officer of the Internal Committee who shall be a woman employed at a senior level or senior amidst the committee members. In case of unavailability of a senior member, a women employee who is trained and empowered to handle complaints against senior-level employees, can play the role.

4.6 Respondent:

means a person against whom the complaint has been filed.

4.7 Sexual Harassment:

includes anyone or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -

- 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.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment in employment
- Implied or explicit threat about present or future employment status
- Interference with work or creating an intimidating or offensive or hostile work environment.
- Humiliating treatment is likely to affect health or safety.

4.8 Workplace:

means all offices or other premises including safety parks where the business of the Company is conducted and includes the places hired for any special events/functions organised by the Company and 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. In the case of work from home, this clause is applicable. Post Pandemic the work place includes online (virtual) platforms used during the course of employment and work from home settings where employees are allowed to work from home.

Any other term not defined herein shall have the same meaning as defined in the Act or any other applicable law.

5. Guidelines:

5.1 Prohibition and Prevention of Sexual Harassment

- (a) No employee and/or any person visiting the **ROSSARI Group** shall be subjected to sexual harassment.
- (b) **ROSSARI Group** will take all appropriate steps to prevent sexual harassment which shall include:
 - Display of penal consequences of sexual harassment at a conspicuous place
 - Organise workshops and awareness programmes at regular intervals to sensitise the employees.
 - Dissemination of this Policy .

5.2. Sexual harassment complaint process

- (a) A Complainant may file a complaint, in writing, at **POSH COMMON EMAIL ID** or deliver by hand six copies of the complaint to any member of the IC member if he or she believes to be subjected to sexual harassment.
- (b) Such a complaint shall be filed within a period of 3 months from the date of the incident and in the case of a series of incidents, within a period of 3 months from the date of the last incident.
- (c) If a complaint is not in writing, all reasonable assistance shall be provided by the IC members to the Complainant.
- (d) The time limit of 3 months may be extended by another 3 months, with reasons to be recorded in writing, if the IC is satisfied that the circumstances were such which prevented the Complainant from filing a complaint.
- (e) If the Complainant is unable to make a complaint on account of physical incapacity, a complaint may be filed by –
 - his or her legal heir; or
 - his or her relative or friend; or
 - his or her co-worker; or
 - an officer of the National Commission for Women or State Women's Commission; or
 - any person who has knowledge of the incident, with the written consent of the aggrieved person.
- (f) If the Complainant is unable to make a complaint on account of mental incapacity, a complaint may be filed by –
 - his or her legal heir; or
 - his or her relative or friend; or
 - a special educator; or
 - a qualified psychiatrist or psychologist; or
 - the guardian or authority under whose care he or she is receiving treatment or care; vi. any person who has knowledge of the incident jointly with his or her relative or friend or a special educator or qualified psychiatrist or psychologist or guardian or authority under whose care he or she is receiving treatment or care.
- (g) If the Complainant, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his or her written

consent. If the aggrieved person is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his or her legal heir

- (h) The complaint shall be filed with all the supporting documents along with the names and addresses of the witnesses.
- (i) If the complaint does not fall under the purview of 'sexual harassment', it may be taken up as per the Company's Code of Conduct.
- (j) On receipt of the complaint, the IC shall share a copy of the Complaint with the Respondent within 7 working days.
- (k) The Respondent shall file his or her reply, along with the list of documents and names and addresses of witnesses, within 10 working days from the date of receipt of the documents.
- (L) If the complainant wants to file a case with the police under BNNS 2023 IC and organisation will support to the Complainant.
- (k) Hearing - Both the complainant and the respondent will be given an opportunity to present their case and provide evidence.
- (l) Examination of witnesses – Taking written statements from the witnesses and conducting separate meeting with the witnesses
- (m) The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Complaints Committee.
- (n) In conducting the inquiry, a minimum of three Members of the Complaints Committee including the Presiding Officer or the Chairperson, as the case may be, shall be present
- (o) Recommendation – IC will write recommendation depending on the findings of the enquiry process.
- (p) Resolution:
 - In the event after the conclusion of the enquiry if the allegations in the complaint does not fall under the purview of the sexual harassment or the complaint does not reveal the offence of sexual harassment the same would be dismissed after the recording the reasons thereof.
 - If the complainant or the respondent desires to cross examine any witness, the IC shall facilitate the same and record the statements of the other party.
 - The enquiry must be completed including the submission of the enquiry report within 90 days from the date on which the enquiry is commenced
 - The enquiry procedure should be ensure the absolute fairness to all parties
 - The IC shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and copy of such report shall be made available to both the aggrieved woman and respondent.
 - If the allegations against the Respondent has not been proved the IC may recommend to the employer not to take any action in the matter
 - If IC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer or consider sexual harassment as a misconduct and take action in accordance with the provisions of the service rules of the company. Such action shall be taken within 60 days of the receipt of the report.

(Q) If an aggrieved individual brings to the notice of the IC any instances of sexual harassment where the respondent is not an Employee or other individuals covered under this policy, the Company or any person delegated by the Company shall provide assistance to the aggrieved individual, if such aggrieved individual so chooses, to file a complaint with the IC of the respondent's employer or under the IPC or any other law for the time being in force, as may be appropriate.

5.3 Considerations while preparing report-

While preparing the findings/recommendations, following factors need to be considered:

- Whether the language used (written or spoken), visual material or physical behaviour was of sexual or derogatory nature.
- Whether the allegations or events follow logically and reasonably from the evidence respondent, witnesses and evidence.
- Credibility of complainant
- Other similar facts, evidence, for e.g. if there have been any previous incidents of harassment pertaining to the respondent.
- Credibility of complainant, 4. Other similar facts, evidence, for e.g. if there have been any previous incidents of harassment pertaining to the respondent
- Both parties have been given an opportunity of being heard
- A copy of the proceedings was made available to both parties enabling them to make representation against the findings
- A copy of the final findings is shared with the complainant and the respondent to them an opportunity to make a representation on the findings to the IC.

5.4. Conciliation

- Before initiating an inquiry and at the request of the complainant, the IC may take steps to settle the matter through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- Where a settlement is arrived at, the IC shall record it and take the action as per the settlement and no further inquiry shall be conducted. Further, copies of such settlement shall be provided to the complainant and respondent.
- If the complainant informs the IC that any term or condition of the settlement has not been complied with by the respondent, the IC will proceed to conduct an inquiry or forward the same to the police.

6. Roles and Responsibilities of the Employees:

It is Responsibility of all to respect the right of others and never encourage the act of Sexual harassment.

6.1 Do not perform/encourage/support/participate in any acts which constitute sexual harassment.

6.2 Resist/report and create a respectful environment.

6.3 Supporting the person to reject unwelcome behaviour that causes a woman employee to feel offended, humiliated and /or intimidated.

6.4 Acting as a Witness if the person being harassed decides to lodge the complaint.

6.5 Reporting of the incident of sexual harassment if woman employee is unable to report the incident due to fear, some coercion or some physical or mental incapacities.

7. Roles and Responsibilities of the Management:

- 7.1 Implementation of POSH compliance
- 7.2 Clear communication with the employees that there is zero tolerance to any kind of discrimination, any kind of act of Sexual harassment.
- 7.3 Management must ensure that proper redressal mechanism is at place within company premises at it's all location.
- 7.4 The complainant's information need to be kept confidential and either respondent or complainants and witnesses are not victimized in any manner.

8. Role of the Internal Committee:

- 8.1 Internal Complaints Committee (IC)- To prevent instances of sexual harassment and to receive, address the complaints effectively which are filed by the aggrieved women. the Company must constitute an Internal Complaints Committee (IC) . The IC will consist of
 - A Presiding Officer who is a woman employed at a senior level.
 - At least two employee members with an understanding of workplace issues.
 - An external member from an NGO or an individual experienced in dealing with sexual harassment issues.
- 8.2 The IC shall conduct an inquiry into the complaint, if the respondent is an employee, as per the company service rules.
- 8.3 Both the complainant and respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the IC. The IC shall conduct the inquiry in accordance with the principles of natural justice.
- 8.4 In conducting the inquiry, a minimum of 3 members of the IC including the presiding officer shall be present.
- 8.5 The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the IC.
- 8.6 The IC shall have the right to terminate the inquiry proceedings or give an ex-parte decision, if the complainant or respondent fails, without sufficient cause, to present themselves for 3 consecutive hearings convened by the presiding officer.
- 8.7 However, such termination or ex-parte order may not be passed without giving a notice, in writing, 15 days in advance to the party concerned.
- 8.8 During the pendency of an inquiry and on a written request by the complainant, the IC may provide such relief as it may deem appropriate and in line with other applicable statutory laws.
- 8.9 The inquiry shall be completed within a period of 90 days. On completion of an inquiry, the IC shall provide a report of its findings to the employer/company within a period of 10 days from the date of the completion of the inquiry and such report be made available to the concerned parties.

- 8.10 Where the IC concludes that the allegation against the respondent has not been proved, it shall recommend to the employer/company that no action is required to be taken in the matter.
- 8.11 Where the IC concludes that the allegation against the respondent has been proved, it shall recommend to the employer/company to take action for sexual harassment as misconduct as per ROSSARI BIOTECH LIMITED (RBL) service rules and/or deduct an appropriate amount from salary or wages of the respondent in accordance with the provisions of the Act.
- 8.12 Where such deduction is not possible, the respondent may be directed to pay such sum to the complainant. in case the respondent fails to pay such sum, the IC may forward the order for recovery of the sum as an arrear of land revenue. The other actions that may be taken include a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, withholding of grant of stock options, terminating the respondent from service, or undergoing a counselling session or carrying out community service.
- 8.13 The Employer/Company shall act upon the recommendation within 60 days of receipt of the recommendation.
- 8.14 The IC shall have the same powers as are vested in the Civil Court under the Code of Civil Procedure, 1908, while conducting an inquiry.
- 8.15 If presiding officer or any IC member is under enquiry or convicted in any other posh case or is mentioned by the aggrieved woman in her complaint under consideration. In such case company / employer would have to reconstitute the IC.
- 8.16 The reconstitution of IC should be done as per the Company's policy by having the Board of Resolution.
- 8.17 Internal committee reserves the right to disqualify the IC member from participating in enquiry proceedings if complainant apprehends bias due to the member's close relationship with the Respondent or vice versa ensuring a fair and impartial inquiry process.
- 8.18 Contact details of members: The Committee has been constituted by the Management to consider and redress Complaints against Sexual Harassment (POSH) at work place of ROSSARI BIOTECH LIMITED (RBL). The contact details of members of the Committee will be made available to all Employees of ROSSARI BIOTECH LIMITED (RBL).
- 8.19 Meeting : The Committee and the management will meet once in three months and shall prepare a Report on the cases, if any lodged with the Committee. This body will also take preventive action to avoid such incidence of sexual harassment at the work place.
- 8.20 IC Member Service Terms: Every member of the Committee shall hold the position for a period not exceeding 3 years from the date of nomination. The same person cannot not be nominated as member of the committee for more than 2 terms.

9. Complaints Unsubstantiated:

Where the IC arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the IC ensures that both parties are made aware that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

10. Complaints Substantiated (Punishments under POSH):

Where the IC arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- Counselling
- Censure or reprimand
- Apology to be tendered by respondent
- Written warning
- Withholding promotion and/or increments
- Suspension
- Termination
- Or any other action that the employer may deem fit.
- community service.

The Internal committee submits their recommendation to the Employer within 10 days on the completion of the enquiry and Employer is required to act upon the recommendations within 60 days and confirm to the IC. Post implementation of the actions, follow up with the complainant should also occur to ascertain whether the behaviour has in fact stopped, the solution is working satisfactorily and no victimization of either party is occurring.

10.1 Penal consequences of Sexual Harassment (BNS 2023)

In case during the process of inquiry, the IC finds that the degree of offence is coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Bhartiya Nyay Sanhita which deals with the offence of Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

11. False or Malicious Complaints:

11.1 If the IC arrives at a conclusion that:

- the allegation against the respondent is malicious; or
- the Complainant has made the complaint knowing it to be false; or
- the Complainant has produced any forged or misleading document; it may take appropriate action against the Complainant.

11.2 However, a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. A malicious intent on the part of the complainant shall be established after an inquiry and before any action is recommended.

11.3 Where the IC arrives at a conclusion that during the inquiry, any witness has given false evidence or produced any forged or misleading document, it may also take appropriate action against the witness as may be prescribed under the Act.

11.4 Definition of False Complaints

A false complaint is defined as a deliberate, malicious, and baseless allegation made against an individual with the intent to harass, defame, or mislead. A complaint will be considered false only if it is proven, after a thorough investigation, that:

- The complaint was intentionally fabricated.
- The complainant acted in bad faith or with malice.
- There was no reasonable basis for the allegations.

Note: A complaint that cannot be substantiated due to lack of evidence will not automatically be considered false. The closure of the case will be done with the help of IC findings.

11.5 Penalty for False Complaints Except in cases where service rules exist, where the Complaints Committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer or District Officer, as the case may be, to take action in accordance with the provisions of rule 9. If, after due inquiry, the Internal Committee (IC) determines that a complaint was filed with malicious intent, the following penalties may be imposed on the complainant:

- **Disciplinary Action:** This may include a written warning, suspension, demotion, or termination of employment, depending on the severity of the act.
- **Legal Consequences:** If applicable, legal action may be taken in accordance with company policies and the law.

A similar action of punishment would be taken against any witness who has given false evidence or produced forged or misleading documents, as per the IC's determination. It is to be noted that this provision is not intended to discourage Employees from coming forward with any complaints. The Company recognizes and expects that some claims may be difficult to prove or support or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

12. Protection Against Retaliation:

No person shall intimidate, retaliate against, victimize, or discriminate against the complainant, respondent, witnesses, or any individual involved in the inquiry process for having filed or responded to a complaint, participated in the proceedings, or supported either party in any manner.

Any act of retaliation or victimization, towards any party involved, will be treated as a serious violation of this Policy and shall attract strict disciplinary action as per company rules and procedures.

As per the Rule 12 of POSH Rules 2013 Subject to the provisions of section 17, if any person contravenes the provisions of section 16 (violates/ breaches the Confidentiality), the employer shall recover a sum of five thousand rupees as penalty for violation of Confidentiality clause

13. Confidentiality:

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

All information pertaining to any complaints of Sexual Harassment should be treated as private and confidential and should not be disclosed to anyone other than the IC or the parties involved in the complaint and, to a limited extent, only to those persons strictly on a “need to know” basis and who are expected to implement the decisions of the IC. Anyone breaching this obligation of confidentiality shall be liable to pay the Company a fine of Rupees Five Thousand (Rs. 5000) and may also be punished as per recommendations of the IC.

The information need to share under Right to information Act 2005 will be considered as exception to this Clause.

14. Protection (Interim Relief):

14.1 Interim Relief: During the pendency of an inquiry on a written request made by the complainant, the Internal Committee, or the local Committee, as the case may be, may recommend to the employer to;—

- Transfer the aggrieved woman or the respondent to any other workplace; or
- grant leave to the aggrieved woman up to a period of three months; or
- grant such other relief to the aggrieved woman as may be prescribed.

14.2 The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.

14.3 Prohibition of publication or making known contents of complaint and inquiry proceedings.

14.4 Notwithstanding anything contained in the Right to Information Act, 2005 (22 of 2005), the contents of the complaint made under section 9, the identity and addresses of the aggrieved person, respondent and witnesses; any information relating to conciliation and inquiry proceedings; recommendations of the Internal Committee or the Local Committee, as the case may be, and the action taken by the employer or the District Officer under the provisions of this Act shall not be published, communicated or made known to the public, press and media in any manner.

- 14.5 Provided that information may be disseminated regarding the justice secured to any victim of sexual harassment under this Act without disclosing the name, address, identity, or any other particulars calculated to lead to the identification of the aggrieved person and witnesses.
- 14.6 For the purpose of determining the sums to be paid to the aggrieved woman under clause (ii) of sub-section (3) of section 13, the Internal Committee or the Local Committee, as the case may be, shall have regard to—
- the mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman.
 - the loss in the career opportunity due to the incident of sexual harassment.
 - medical expenses incurred by the victim for physical or psychiatric treatment.
 - the income and financial status of the respondent.
 - feasibility of such payment in lump sum or in instalments.

15.Termination of Enquiry:

IC may terminate the employee or give Ex-Party decision if the complainant or respondent respectively is absent for three consecutive hearings without sufficient reasons. 15 days written notice to be given to the either party, before the termination of enquiry or Ex –Party order.

16. Appeal:

Any person aggrieved from the recommendations made, may prefer an appeal to the Court or Tribunal. This appeal shall be preferred within a period of 90 days from the date of the recommendations.

17.Review and Amendments:

This Policy may be reviewed by the Board of Directors as and when required. In the event of any conflict between the provisions of this Policy and the Act or any other statutory enactments, or rules, the provisions of such Act or statutory enactments or rules shall prevail over this Policy. Any subsequent amendment/modification in the Act and/or other applicable laws in this regard shall automatically apply to this Policy.

18.Awareness Training to the Employees:

The Company will conduct regular awareness programs for employees.

- All the women Employees, Partners and Visitors shall have access to this Policy.
- An awareness program shall be conducted among the women employees on the Policy & formation of IC.
- The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at work place.
- The Company shall display at any conspicuous place in the workplace, the penal consequences of sexual harassments, and the order constituting, the internal Committee. Company shall make a declaration regarding the Policy on sexual harassment every year in the annual report.

19. IC Training by an Expert:

Specialized training sessions will be provided for IC members.

20. Miscellaneous:

- Company with the approval of Board may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as, long as it complies to the Act.
- Any such alterations, amendment, or rescinding will be intimated to all the employees.
- Nothing contained in Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

21. Annual Report:

The Chairperson of the IC shall prepare and submit an annual report, which shall be placed before the Management and the following details shall be stated in the Report-

- Number of Complaints of sexual harassment received during the year.
- Number of complaints disposed of during the year;
- Number of cases pending for more than 90 days:
- Number of workshops or awareness program against sexual harassment carried put
- Nature of action taken by the employer.
- The above Annual Report and the MIS should be prepared by the IC and shall be submitted to the Employer every year.

This policy will be reviewed periodically to ensure compliance with legal standards and the evolving needs of the organization.

22. Principles of Natural justice:

The principal of natural justice will be adopted during investigation. The Committee shall immediately proceed with the Inquiry and communicate the same to the Complainant and alleged offender. Thus, both parties, the applicant as well as the alleged offender, will be given an opportunity to represent their case and produce witnesses or evidence in support of their allegations and defense.

23. Amendments:

The Company may amend this Policy and the related Appendices from time to time to reflect any changes in the applicable laws or even otherwise to ensure that its Work Environment is free from Sexual Harassment. Any such alterations or amendments will be intimated to the employees from time to time.

For any queries or to file a complaint, employees can contact the IC at : herewe@rossari.com

Annexure

List of Members

Internal Committee of Rossari Group

Role	Name	Official Contact Number	Official Email ID
External Member For Rossari Group	Adv. Seema Sharma	9209400241	Uniquelaw999@gmail.com , info@avkposh.com

Entity	Location	Role	Name	Official Contact Number	Official Email ID
Rossari Biotech Limited	Head Office	Presiding Officer	Saroj Belekar	8425856216	saroj.belekar@rossari.com
		Internal Member	Jitendra Kumar	8657864311	jitendra.kumar@rossari.com
		Internal Member	Nitish Dharap	8104964093	Cs1.ho@rossari.com
Rossari Biotech Limited	Koper khairane Lab	Presiding Officer	Kavita Bhabal	8828480134	kavita.bote@rossari.com
		Internal Member	Sanket Ramane	8655623314	sanket.ramane@rossari.com
		Internal Member	Amol Hirawale	9404525079	amol.hivrale@rossari.com
Rossari Biotech Limited	Dahej Plant	Presiding Officer	Kajol Panwala	8733032920	env.dahej@rossari.com
		Internal Member	Bhavin Shah	8591305064	bhavin.shah@rossari.com
		Internal Member	Abhijeet Parikh	7700943273	abhijeet.parikh@rossari.com
Rossari Biotech Limited	Silvassa Plant	Presiding Officer	Sushama Kadam	7383634795	qc1.hul@rossari.com
		Internal Member	Sandeep Bhandari	9136473258	sandeep.bhandari@rossari.com
		Internal Member	Nandkumar More	8401052042	production@rossari.com
Buzil Rossari Private Limited	Silvassa WH	Presiding Officer	Sushama Kadam	7383634795	qc1.hul@rossari.com
		Internal Member	Sandeep Bhandari	9136473258	sandeep.bhandari@rossari.com
		Internal Member	Nandkumar More	8401052042	production@rossari.com

Entity	Location	Role	Name	Official Contact Number	Official Email ID
Buzil Rossari Private Limited	Head Office	Presiding Officer	Megha Ranjit	8291927478	brpl.mktg1@rossari.com
		Internal Member	Kundan Solanki	9892846031	kundan.solanki@rossari.com
		Internal Member	Virendra Bhagat	9960752528	supplychain@rossari.com
Buzil Rossari Private Limited	Bhiwandi Plant	Presiding Officer	Rajitha Yogesh	8425856202	rajitha@rossari.com
		Internal Member	Chandesh Sharma	8180827421	chandesh.sharma@rossari.com
		Internal Member	Chetankumr Patel	7984389769	chetan.patel@rossari.com
Rossari Consumer Product Private Limited	Bhiwandi WH	Presiding Officer	Rajitha Yogesh	8425856202	rajitha@rossari.com
		Internal Member	Chandesh Sharma	8180827421	chandesh.sharma@rossari.com
		Internal Member	Chetankumr Patel	7984389769	chetan.patel@rossari.com
Rossari Consumer Product Private Limited	Head Office	Presiding Officer	Sneha Rani	7070672679	petcare.pro1@rossari.com
		Internal Member	Sarfaraz Khan	9893048880	sarfaraz.khan@rossari.com
		Internal Member	Vinay Brijwani	8369331441	sales3@rossari.com
Unitop Chemical Private Limited	Head Office	Presiding Officer	Prafulla Palkar	9004087320	unitop.export1@rossari.com
		Internal Member	Pandurang Kharade	8591938284	admin4.ho@rossari.com
		Internal Member	Atul Ghadigaonkar	9004678322	it04@rossari.com
Unitop Chemical Private Limited	Dahej Plant	Presiding Officer	Bhavita Jain	6358884278	bhavita.jain@rossari.com
		Internal Member	Keyur Shah	9978391823	keyur.shah@rossari.com
		Internal Member	Jitendra Appasaheb	7383679722	jitendra.dike@rossari.com
Unitop Chemical Private Limited	Jammu Plant	Presiding Officer	Rajitha Yogesh	8425856202	rajitha@rossari.com
		Internal Member	Pardeep Bakshi	9419796955	bakshi@rossari.com
		Internal Member	Yash Sharma	7298012718	isro.production@rossari.com

Entity	Location	Role	Name	Official Contact Number	Official Email ID
ROMAKK Chemicals Private Limited	Vasai Plant	Presiding Officer	Minal Patil	7627872720	accounts@romakksilicones.com
		Internal Member	Santosh Mohit	8291862205	production@romakksilicones.com
		Internal Member	Karanraj Panchal	8698120766	hr6@rossari.com
Tristar Intermediates Private Limited	Sarigam Plant	Presiding Officer	Sheela Wayal	9374810446	sheela@rossari.com
		Internal Member	Sanjay Marballi	9377001073	sanjaymarballi@rossari.com
		Internal Member	Parmeshwar Belamgi	9898067436	parameshwar@rossari.com