

NAINI PAPERS LIMITED

Prevention of Sexual Harassment Policy (POSH)

Purpose: To create a safe and respectful work environment, free from sexual harassment, and to comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Scope: This policy applies to all the premises covering all employees, contractors, vendors, and visitors of NAINI PAPERS LIMITED, regardless of their position or status.

Definitions:

- **Sexual Harassment:** Unwelcome behaviour or conduct of a sexual nature, including verbal, non-verbal, or physical more particularly mention under Section 2(a) & 2(e) of the Prevention of Sexual Harassment (POSH) Act 2013.
- **Aggrieved Person:** Employee experiencing sexual harassment.
- **Respondent:** Person alleged to have committed sexual harassment.

Policy Statement: NAINI PAPERS LIMITED is committed to:

1. Preventing sexual harassment at the workplace.
2. Providing a safe and respectful work environment.
3. Ensuring prompt and fair investigation of complaints.
4. Taking appropriate action against perpetrators.

Prohibited Conduct:

1. Unwanted touching, gestures, or physical contact.
2. Sexual advances, requests, or suggestions.
3. Displaying pornographic or obscene materials.
4. Making sexually explicit comments or jokes.
5. Any other unwelcome behaviour of a sexual nature.

Reporting Mechanism: Aggrieved persons can report incidents to:

- **Internal Complaints Committee (ICC)**
 - **Presiding Officer:**
 - Ms. Paridhi Agarwal (Vice President HR)
 - Email: paridhi@nainigroup.com

Complaint:

The complaint shall be made in writing within three months of the incident. If the complainant is not able to make the complaint in writing, assistance shall be provided.

Investigation Procedure:

1. ICC will conduct investigations within 90 days.
2. Aggrieved person and respondent will be informed of the outcome.
3. Disciplinary action will be taken within 30 days.

Penalties:

Employees found guilty of sexual harassment may face:

- Warning
- Suspension
- Termination
- Other disciplinary actions including deduction of salary.

Protection to Complainant / Victim:

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

Privacy of Enquiry:

The identity and address of the aggrieved person, respondent and witnesses and enquiry proceedings, recommendations of the ICC 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 witness.

Training and Awareness:

1. Regular training sessions for employees.
2. Displaying POSH policy and contact information.

Monitoring and Review:

The Board of Directors of NPL will monitor and review the adequacy of this Policy.

Amendments:

The Board of Directors of NPL reserves the right to vary and / or amend the terms of this Policy from time to time at its absolute discretion.

Internal Complaints Committee Members other than the Presiding Officer:

1. **Member:** Mr. Mukesh Tyagi (Director Technical)
 - o Email: mukesh.tyagi@nainigroup.com | Mobile: 6399488800
2. **Member:** Mr. Surendra Singh Rana (Head HR)
 - o Email: ssrana@nainigroup.com | Mobile: 9811653589
3. **Member:** Ms. Meenakshi Rawat (Deputy Manager HR)
 - o Email: meenakshi.hr@nainigroup.com | Mobile: 7055315230
4. **Member:** Mr. Mani Kant (Vice President Engineering)
 - o Email: manikantsharma@nainigroup.com | Mobile: 9927196459
5. **Member:** Mr. Pramod Yadav (General Manage Recovery)
 - o Email: pramod@nainigroup.com | Mobile: 9690022243
6. **Member:** Ms. Anukriti Gupta (Executive Finance & Accounts)
 - o Email: anukriti.gupta@nainigroup.com | Mobile: 9837450759
7. **External Member:** Ms. Divya Schrawat
 - o Email: divyasehrawat98@gmail.com | Mobile: 8427232859