



POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH)

I. OBJECTIVES

To create and maintaining a secure work environment where it's Employees, Agents, Vendors, and Partners 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 other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Unifrax India Private Limited (UIPL) strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder (hereinafter referred to as "Act") as well as the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action. At UIPL, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep personal dignity. We at UIPL are committed to giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. UIPL will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint

II. SCOPE

UIPL's Policy with regard to Prevention, Prohibition, and Redressal of Sexual Harassment covers every "employee" across the Company. UIPL encourages every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy. The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices/branches but includes all such places or locations where acts are conducted in the context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit. UIPL's Prevention of sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and, visitors including outsourced employees. Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of the same gender.



III. DEFINITIONS

1. "Aggrieved Person" means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent and includes aggrieved Woman.
2. Aggrieved Women:
 - (a) In relation to the workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
 - (b) In relation to a dwelling place or house, a woman of any age who is employed in such a dwelling place or house.
3. "Company" means Unifrax India Private Limited (UIPL)
4. "Employee" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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
5. "Employer" means the Company or any person responsible for the management, supervision, and control of the workplace.
6. "Internal Complaints Committee" means a committee constituted by Company as per this Policy in terms of section 4 of the Act.
7. "Respondent" means a person against whom the aggrieved person has made a complaint.
8. "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
 - i. Physical contact and advances; or
 - ii. A demand or request for sexual favors; or
 - iii. Making Sexually colored remarks; or
 - iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
 - v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or