

# **Dhaval Packaging Limited**

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## **PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY**

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Section 19 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “POSH Act”) read with Rule 13 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the “Rules”).



## PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

### 1. PREAMBLE

In accordance with the provisions of Section 19 of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “**POSH Act**”) read with Rule 13 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the “**Rules**”), the Board of Directors of the Company formulated and approved this POSH Policy (“**Policy**”) in its duly convened and held meeting of the Board (“**Board**”), dated October 18, 2025.

### 2. OBJECTIVE

Sexual harassment results in violation of the fundamental rights of a woman to equality under articles 14 and 15 of the Constitution of India and her right to life and to live with dignity under article 21 of the Constitution and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. The protection against sexual harassment and the right to work with dignity are universally recognized human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on the June 25, 1993 by the Government of India.

Dhaval Packaging Limited (“**Company**”) is committed to creating a safe environment for all its employees where each employee is treated with dignity and respect. Employees are expected to maintain the highest standard of ethical conduct at workplace. This policy is designed to prevent and prohibit sexual harassment in the workplace, as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. It applies to all employees, including full-time, part-time, temporary, and contract workers, as well as customers, clients, vendors, and visitors who interact with the company's employees. The policy applies to all locations where the company operates.

### 3. DEFINITIONS

For the purpose of this Policy the following terms shall have the meanings assigned to them hereunder:

- a) “**Act**” means the Companies Act, 2013, read with the rules thereunder, as amended.
- b) “**Board**” means the board of directors of the Company.
- c) “**Committee**” means the Internal Complaints Committee.
- d) “**Company**” means Dhaval Packaging Limited.
- e) “**Director**” means a member of the Board.
- f) “**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, as defined under section 2(g)(ii) of the Protection of Women from Sexual Harassment Act, 2013 (the “**POSH Act, 2013**”).
- g) “**Employer**” means any person responsible for the management, supervision and control of the workplace, as defined under section 2(g)(ii) of the POSH Act, 2013.

Words and expressions used and not defined in this Policy shall have the meaning ascribed to them in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 or the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.



#### 4. SCOPE

Sexual harassment includes unwelcome physical contact, advances, gestures, or comments of a sexual nature; display of sexually suggestive or explicit material; and any other conduct that creates an intimidating, hostile, or offensive work environment. Sexual Harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between coworkers, it may also occur between an Employee and someone that Employee deals with in the course of his/her work who is not employed by the Company. Sexual harassment can happen regardless of the individuals' gender, gender identity, or gender expression and can, for example, occur between same-sex individuals as well as between opposite sex individuals, and does not require that the harassing conduct be motivated by sexual desire. It includes but not limited to:

Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:

- a) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit;
- b) Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation;
- c) Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one's will;
- d) Demand or request for sexual favors;
- e) Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
- f) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas;
- g) Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures, etc.;
- h) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- i) Giving gifts or leaving objects that are sexually suggestive;
- j) Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and
- k) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, if it occurs or is present in relation to any sexually determined act or behavior, amount to sexual harassment:

- a) Implied or explicit promise of preferential treatment in employment;
- b) Implied or explicit threat of detrimental treatment in employment;
- c) Implied or explicit threat about the present or future employment status;
- d) Interference with employee's work performance or creating an intimidating, hostile, or offensive working environment; and
- e) Humiliating treatment likely to affect health or safety.

#### 5. PREVENTION AND REDRESSAL MECHANISM

Our company has a POSH Committee, which consists of a chairperson, two internal members, and one external member. The committee is inter alia responsible for receiving complaints, investigating them, and providing redressal to the complainant. The committee will ensure that the complainant is treated with sensitivity, confidentiality, and impartiality throughout the process. The details of the Committee are provided in **Annexure A**.



All employees are encouraged to report any incident of sexual harassment or gender-based violence to the POSH Committee. The company prohibits any retaliation against the complainant or any witness for reporting such incidents. The complaint shall be submitted by the complainant to the Committee in writing or shall be submitted electronically through email at [cs@dhalvalpackaging.com](mailto:cs@dhalvalpackaging.com). The complaint can also be submitted in person to any Committee member.

## **6. PROCEDURE FOR FILING A COMPLAINT (as prescribed under Section 9 of the POSH Act read with Rule 6 of the POSH Rules)**

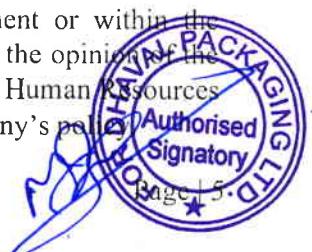
- a) Any aggrieved individual who has experienced or has been subjected to any form of sexual harassment by an Employee shall be entitled to lodge a complaint with the Committee within a period of 3 months from the date of incident or in case of a series of incidents, the last incident. The Committee can extend the timeline by another 3 months for reasons recorded in writing, if it is satisfied that these reasons prevented the lodging of the complaint within the period.
- b) The Committee can initiate inquiry on the complaint only if the complaint is in writing. In case a complaint may be conveyed verbally to any member of the Committee, the member of the Committee to whom the complaint is made or any other member of the Committee shall render all reasonable assistance to the aggrieved individual for making the complaint in writing.
- c) The complaint must contain a description of the event (s) as well as the names and addresses of Witnesses if any. Supporting documents, if available, such as letters, transcription of text messages etc.
- d) If a Complainant is unable to lodge a complaint because of any physical incapacity a complaint may be filed by:
  - her relative or friend; 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 woman.
- e) where the aggrieved woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by-
  - her relative or friend; or
  - a special educator; or
  - a qualified psychiatrist or psychologist; or
  - the guardian or authority under whose care she is receiving treatment or care; or
  - any person who has knowledge of the incident jointly with her relative or friend or a special
  - educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
- f) where the aggrieved woman 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 her written consent.
- g) where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

## **7. PROCESSING AND RESOLUTION OF COMPLAINT**

- a) On receipt of a complaint, the Committee will acknowledge receipt of the complaint and explain the process of inquiry to be followed to the Complainant by holding a meeting within 7 working days.



- b) During the initial meeting, the Committee will listen to the Complainant and document her accusations. The Complainant is allowed to provide any supporting materials such as written or oral statements or any evidence to substantiate her complaint.
- c) The Committee will proceed with the investigation and inform both the Complainant and Respondent about the proceedings.
- d) Within 7 working days of receiving the complaint, the Committee will provide the Respondent with one copy of the complaint.
- e) The Respondent must provide all relevant supporting documents within 10 working days of receiving the complaint copy.
- f) It is mandatory for a minimum three members of the Committee, including the Presiding Officer or Chairperson to be present at each of the hearings.
- g) The Respondent may be requested to provide a deposition before the Committee, where he will have an opportunity to explain his side of the story, after which an inquiry will be conducted and concluded.
- h) The Respondent's written explanation will be provided to the Complainant.
- i) If either the Complainant or Respondent wishes to call any witnesses, they must submit a written request with the witness's name to the Committee.
- j) All witnesses mentioned by both parties will be summoned by the Committee.
- k) The Committee will give both the Complainant and the Respondent an adequate opportunity to present and defend their respective cases.
- l) If either party wishes to present any documents as evidence, they must provide original copies of such documents with their signature affixed to certify them as original.
- m) No legal practitioner can represent any party during the inquiry procedure.
- n) The Committee will conduct the investigation according to the principles of natural justice.
- o) At least three Committee members, including the Presiding Officer, must be present during the inquiry.
- p) The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
- q) If the parties desire to cross examine any witnesses, the Committee shall facilitate the same and record the statements. In case a complainant or respondent seeks to ask questions to each other, they may give such questions to the Committee which shall ask them and record the statements.
- r) The Committee must complete the inquiry, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure should ensure absolute fairness to all parties.
- s) If the complaint does not fall within the definition of sexual harassment or within the jurisdiction of the Committee, the complaint may be dropped or based on the opinion of the Committee the complaint will be referred by the Committee to the relevant Human Resources department for appropriate action under the relevant and applicable Company's policy.



- t) The Committee may, before initiating an inquiry, take steps to settle the matter between the Complainant and the Respondent through a process of conciliation, if the Complainant expressly requests for the same. No monetary settlement shall form the basis of the conciliation and all conciliation activities shall be documented.
- u) Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take necessary steps and reasonable measures to assist the individual in terms of support and preventive action.]

## 8. INTERIM RELIEF

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- a) Transfer the complainant or the respondent to any other location or office of the Company.
- b) Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled.
- c) Prevent the respondent from assessing the complainant's work performance, or writing her confidential report, and assign the same to another officer.
- d) Grant such other relief as may be appropriate.

Once the recommendations for interim relief are implemented, a report of the implementation shall be sent to the Committee.

## 9. TERMINATION OF INQUIRY

If the Complainant or Respondent is absent for three consecutive hearings without valid reasons, the Committee may terminate the inquiry or provide an ex parte order. A written notice must be given to the concerned party 15 days before the termination of the inquiry or the ex parte order.]

## 10. POST-INQUIRY PROCEDURE

- a) After conclusion of the inquiry, the committee will present its report, which includes the findings and recommendations, to the employer within 10 days of completion of the inquiry.
- b) If the committee determines that the accusation against the respondent is unproven, it shall recommend to the employer that no action is necessary. Additionally, the committee ensures that both parties comprehend that the matter has been thoroughly investigated, concluded, and neither will be discriminated against in the company.
- c) If the committee determines that the accusation against the respondent has been proven, it shall recommend that the employer should take appropriate action which may include:
  - A written apology from the Respondent;
  - A letter of warning may be placed in the personal file of the Respondent;
  - Reprimand or censure;
  - Immediate transfer or suspension without pay;
  - Withholding of pay rise or increment(s);
  - Undergoing a counselling session;
  - Termination from service; and/or
  - Any other action the employer may deem fit.
- d) The Company shall act upon the recommendations within 60 days and confirm such action to the Committee.



- e) In case the degree of the offence, as per the findings of the Committee, is coverable under the Indian Penal Code, then such fact shall be mentioned in the report and the employer shall take appropriate action to initiate a police complaint.
- f) If the committee concludes that the accusation against the respondent is malicious or that the complainant or any other person who lodged the complaint did so with knowledge that it was false or submitted a falsified or misleading evidence, it may recommend that the employer take action against the complainant or the individual who filed the complaint. However, mere failure to support a complaint does not necessarily imply malicious intent. To establish malicious intent, a separate inquiry must be conducted.

## 11. COMPENSATION

- a) The Committee may also recommend payment of compensation to the Complainant by the Respondent. For the purpose of determining the compensation to be paid, the Committee shall take into account:
  - b) the mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman;
  - c) the loss in the career opportunity due to the incident of sexual harassment;
  - d) medical expenses incurred by the victim for physical or psychiatric treatment;
  - e) the income and financial status of the respondent; and
  - f) feasibility of such payment in lump sum or in instalments.

## 12. CONFIDENTIALITY

For the purpose of this policy, the identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of the inquiry process, recommendations of the committee, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the POSH Act.

## 13. APPEAL

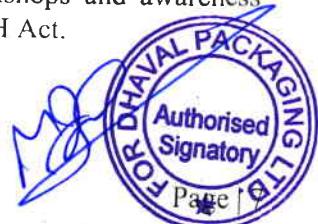
Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

## 14. EDUCATION AND AWARENESS

The Company shall:

- a) Formulate and widely disseminate internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- b) Carry out orientation programs and seminars for the members of the Committee.
- c) Conduct capacity building and skill building programs for the members of the Committee.
- d) Declare the names and contact details of all the members of the Committee.
- e) Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the POSH Act.

## 15. ANNUAL REPORT



The Committee shall in each calendar year prepare an Annual Report which shall contain the following details:

- a. number of complaints of sexual harassment received in the year;
- b. number of complaints disposed off during the year;
- c. number of cases pending for more than ninety days;
- d. number of workshops or awareness programme against sexual harassment carried out; and
- e. nature of action taken by the employer or District Officer.

#### **16. EFFECTIVE DATE**

This Prevention of Sexual Harassment Policy shall come into effect on October 18, 2025.



## ANNEXURE A

### 1. CONSTITUTION OF THE INTERNAL COMPLAINTS COMMITTEE:

Presiding Officer  
Member  
Member  
Member

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