



**POLICY ON PREVENTION
OF SEXUAL
HARASSMENT (POSH)
AT WORKPLACE**

HEXAGON NUTRITION LTD.

Effective Date: 01/07/2026

Introduction:

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, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

Further, our success is based on our people. We treat each other with respect and dignity and expect everyone to promote a sense of personal responsibility. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

This Policy on Prevention of Sexual Harassment of Women at Workplace intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

Objective:

The objective of this policy is to prohibit and provide protection against Sexual Harassment to all the employees who are on the rolls or on contract, vendors, suppliers, consultants, trainees, visitors, community workers etc.

Applicability:

This policy is applicable to all employees of Hexagon Nutrition Ltd. across its head office and all manufacturing units situated at locations as mentioned in Annexure ‘A’. It covers employees at every level i.e. permanent, temporary, contractual, trainees, apprentices, and volunteers as well as any women visiting the workplace such as contractors, vendors, clients, interns, suppliers, or customers, consultants, visitors, community workers etc. who are on rolls or on contract. The policy covers harassment of women by men or men by women. This is a **Zero Tolerance** policy irrespective of who is involved.

While the POSH Act, 2013 specifically protects women employees and visitors, the Company is equally committed to a harassment-free workplace for persons of all genders including **LGBTQ+**. Any complaint of sexual harassment will be taken seriously and addressed under this policy, irrespective of the gender of the complainant or respondent, in keeping with principles of equality and non-discrimination. The policy is applicable not only within the

physical office premises and factory sites, but extends to any place or situation connected to work. This includes company-provided transportation, off-site company events, business trips, client meetings, training programs, office outings, or any location where Company business is conducted or where workplace interactions occur (including virtual/online work environments). The term “workplace” under this policy has a broad definition, encompassing any place visited by the employee arising out of or during the course of employment, and includes remote work locations and electronic communications as well.

Alignment with Grievance Procedure:

The POSH mechanism is integrated with the Company’s grievance redressal framework. If a complaint involves sexual harassment, it shall be addressed through the specialized process outlined in this policy (under the Internal Committee), rather than the general grievance handling channel. However, this policy complements the existing grievance procedure – ensuring that all employee complaints are resolved through appropriate routes. HR and Management will ensure that any grievance or misconduct reported that falls under sexual harassment is redirected to the IC promptly, and that the complainant receives the support and confidentiality protections guaranteed by this policy.

Definitions:

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 co-workers. It may also occur between an employee of Hexagon Nutrition Ltd; and someone that employee deals with in the course of his/her work who is not employed by the Company.

- 1) **“Sexual Harassment”**: includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):
 - a) 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:
 - i. Physical contact and advances;
 - ii. Demand or request for sexual favors;
 - iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
 - iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, videos etc.;

- v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- vi. Giving gifts or leaving objects that are sexually suggestive;
- vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
- viii. Persistent watching, following, contacting of a person; and
- ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

b) The following circumstances if it occurs or is present in relation to any sexually determined act or behavior 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 the present or future employment status;
- Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect her health or safety.

The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the impact / experience of the aggrieved woman.

- 2) **Aggrieved woman:** In relation to a 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 and includes contractual and temporary employees, visitors.
- 3) **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.
- 4) **Employee:** A person employed at the 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name.

- 5) **Workplace:** In addition to the place of work [Head office / Manufacturing units] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Hexagon Nutrition Ltd; including transportation provided for undertaking such a journey. Any place where business or work-related activities of the Company are conducted which shall also include other than the Company's head office, all manufacturing units and offices; any off-site locations visited for Company work, client sites, Company owned/arranged transportation for work commute or trips, hotels or venues used for conferences/training, and even employee housing provided by the Company. It also covers work-related communications or activity through digital platforms (e.g. emails, office chat systems, video conferences) in so far as they relate to the work environment. Essentially, if an incident has a work nexus, it falls under the "workplace" for this policy's purpose.
- 6) **Employer:** A person responsible for management, supervision and control of the workplace.

Policy Statement:

Policy Statement: Hexagon Nutrition Ltd. hereby reiterates that sexual harassment in any form is strictly prohibited and will not be tolerated. The Company is dedicated to providing a work environment that is free from harassment, ensuring every employee's right to dignity at work. All employees, regardless of gender, are expected to uphold a standard of conduct that respects colleagues' personal boundaries. Any incident of sexual harassment will be addressed promptly, confidentially, and impartially. The Company will take appropriate disciplinary action against any person found to have engaged in sexual harassment, up to and including termination of employment, in accordance with the law and principles of natural justice.

Roles & Responsibilities:

- 1) **Responsibilities of an Individual:** It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:
- a. Refusing to participate in any activity which constitutes harassment.
 - b. Supporting the person to reject unwelcome behavior.
 - c. Acting as a witness if the person being harassed decides to lodge a complaint.
- All are encouraged to advise others of behavior that is unwelcome. Often, some behaviors are not intentional. While this does not make it acceptable, it does give the

person behaving inappropriately, the opportunity to modify or stop their offensive behavior.

- 2) **Responsibilities of Managers:** All Managers at Hexagon Nutrition Ltd; must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

Redressal Mechanism – Formal Intervention:

In compliance with the Act, if the complainant warrants formal intervention, the complainant needs to lodge a written complaint, which shall be followed by a formal redressal mechanism as described in this Policy. In case of a verbal complaint, the complaint will be reduced in writing by the receiver of the complaint and signatures of the complainant will be obtained.

Internal Complaints Committee (Henceforth known as ‘IC or Internal Committee’):

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Committee" is constituted at each location separately. The details of the committee is notified to all covered persons at each of the locations (workplace).

Constitution of Internal Committee:

The committee at each location comprises of:-

- Presiding Officer: A woman employed at a senior level position in the organization or workplace.
- At least 02 members from amongst employees, i.e from the Personnel Function and from the Divisional/ Plant Personnel Head/ Branch Commercial Manager or any other senior employee of the Division.
- One External Member from an NGO or Lawyer having legal knowledge and/or familiar with the issues relating to sexual harassment.
- At least one half of the total members is women.

Order of Constitution:

The IC at each location separately as mentioned in **Annexure ‘A’** will be constituted through a written order i.e Office Order from the Management of the Company.

Requirement for Multiple Committees:

As a Company operating multiple facilities, we recognize our legal obligation to establish an Internal Committee at each office or unit employing 10 or more employees. Each manufacturing unit and the head office are considered separate “workplaces” for the purposes of this law, and hence each will have its own Internal Committee. All ICs will function in accordance with the POSH Act, and a standardized approach will be adopted across the Company to ensure consistency. A senior HR representative or other designated official at corporate level will coordinate among the various ICs to share best practices and ensure uniform compliance, but each IC is autonomous in handling cases at its location. In case an IC cannot be constituted at a particular location due to insufficient staff (e.g., if a unit had less than 10 employees or lacks an eligible senior woman for Presiding Officer), the Company will make alternative arrangements as per law – such as having the complaint addressed by the IC of another location or by the government’s Local Committee. (However, currently all our units meet the criteria for having their own IC).

The committee is responsible for:

- Receiving complaints of sexual harassment at the workplace.
- Initiating and conducting inquiry as per the established procedure.
- Submitting findings and recommendations of inquiries.
- Coordinating with the employer in implementing appropriate action.
- Maintaining strict confidentiality throughout the process as per established guidelines.
- Submitting annual reports in the prescribed format.

Current nominated members of the committees are given in **Annexure B** location wise separately.

Qualifications and Qualities of IC Members:

In addition to the formal criteria above, the following qualities are considered when appointing IC members: integrity, objectivity, sensitivity, and approachability. Members should not have any proven misconduct records. They should be trusted by colleagues to handle issues confidentially. All IC members must undergo orientation on the POSH law and investigation techniques so they are well-equipped to fulfil their role.

Tenure of IC Members:

As per Section 4(3) of the POSH Act, no member can hold office for more than three years from the date of appointment. Therefore, the tenure of each IC (including all its members) will be 3 years. The Company will formally reconstitute each IC at intervals not exceeding three years. Members may be eligible for re-nomination, but as a best practice,

we will rotate membership to bring in fresh perspectives and also to give others a chance to contribute (except in cases where suitable replacements are not available, in which case an existing member's term could be extended slightly with proper justification, ensuring compliance with law). The term of the current IC members will be indicated in their appointment letter. A centralized record of when each IC was last formed will be maintained by HR to trigger reconstitution before the 3-year term lapses.

Removal and Disqualification:

An IC member (including the Presiding Officer or external member) may be removed before the completion of their term if they cease to meet the criteria or breach certain conditions. The POSH Act provides specific grounds under which the Presiding Officer or any member must be disqualified and removed from the IC.

These include:

- If the member contravenes the provisions of the POSH Act or its rules.
- If the member has been convicted of an offense or there is an ongoing criminal inquiry against them.
- If the member has been found guilty in any disciplinary proceedings in the Company, or if a disciplinary proceeding is pending against them
- If the member has abused their position as an IC member, or engaged in any conduct that makes their continuance in the committee prejudicial to public interest or the interest of the Company
- In the event any of the above situations arise, the member will be removed from the IC immediately, and the vacancy will be filled by a fresh nomination of another person who meets the required criteria.

Training and Capacity Building of IC:

The Company will organize training for IC members at regular intervals (at least annually). This training will cover the POSH Act and Rules, skills for conducting inquiries (interview techniques, evidence evaluation), documentation, and sensitivity in dealing with traumatized individuals. Members will also be updated on any case law or amendments in this area. New IC members (especially external members) will receive an orientation on the Company's business, work culture, and this POSH policy. Periodic meetings of all ICs (across units) may be convened by Corporate HR so that members can discuss challenges and share best practices (these can be without discussing specifics of any case, to maintain confidentiality).

IC Operations and Meetings:

While the IC will primarily meet when a complaint is received (to conduct inquiries), it is recommended that ICs hold at least one meeting each quarter even if there are no pending cases. In such meetings, they can review the implementation of this policy, plan awareness activities, and discuss any procedural improvements. Minutes of these meetings should be recorded by the Presiding Officer or a member. These minutes can be reviewed by senior management for compliance checks (excluding any case-specific confidential details). Each IC should also coordinate with the Company's HR/Compliance team to prepare the annual summary report of cases (even if nil cases, a report stating such) for submission to the District Officer and inclusion in the Company's annual disclosures.

Lodging a Complaint:

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace.

The complaint must be lodged within 03 months from the date of incident/ last incident. The Committee can extend the timeline by another 03 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

If the aggrieved woman is unable to lodge the complaint on account of her incapacity, the following may do so on her behalf, with her written consent.

- Legal heir, relative or friend
- Co-worker
- Any person having the knowledge of the incident

If the initial complaint is made to a person other than a committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the committee immediately.

Wherever possible Hexagon Nutrition Ltd; ensures that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

Guidelines for receiving a Complaint:

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are kept in mind by the receiver of the complaint:

- a) Complaints are listened to and the complainant is informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily.
- b) Situations are not be pre-judged. Written notes are taken while listening to the person. Complainant is allowed to bring another person to the meeting if they wish. When taking accurate notes, complainants own words, where possible, are to be used. Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
- c) All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- d) The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.

Care should be taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

Contents of Complaint:

It is in the complainant's interest to provide as much detail and supporting material as possible. As per law, the complainant should ideally submit six copies of the written complaint along with supporting documents and names/addresses of witnesses. (The reason for six copies is that one is kept for records, one for the respondent, and copies for each IC member). If the complaint is received via email or single copy, the IC will arrange to duplicate the copies as needed internally. The complainant should sign the complaint (if a physical copy). Annexure C provides a template that covers all necessary information for a complaint.

Initial Review:

On receiving the complaint, the Presiding Officer should do a preliminary check to ensure it falls under the ambit of sexual harassment and this policy. If any essential information is

missing (e.g., dates or names), the IC can reach out to the complainant for clarification. However, the IC should not reject any complaint outright due to formality issues – all complaints of alleged sexual harassment must be formally registered and processed. The IC will assign a unique reference number or code to the case for tracking (especially if multiple cases in the year).

Conciliation-Resolution Procedure through Conciliation:

Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman.

It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of complaint by the respondent. It is a practical mechanism through which issues are resolved or misunderstandings are cleared.

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action.

Resolution through conciliation happens within two weeks of receipt of complaint. The committee provides copies of the settlement to the complainant and the respondent. Once the action is implemented, no further inquiry is conducted.

Resolution procedure through formal Inquiry Process:

Conducting Inquiry:

The committee shall initiate inquiry in the following cases where:

- No conciliation is requested by aggrieved woman
- 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.

The Committee proceeds to make an inquiry into the complaint within a period of 1 week of its receipt of the original complaint/closure of conciliation/repeat complaint.

Manner of making inquiry into the Complaint:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses.

- Upon receipt of the complaint, the committee sends 1 copy of the complaint to respondent within 7 working days.
- Respondent replies with all supporting documents within 10 working days of receiving the copy of the complaint.
- No legal practitioner can represent any party at any stage of the inquiry procedure.
- The Complaints Committee makes inquiry into the complaint in accordance with the principles of natural justice.
- In conducting the inquiry, a minimum of three committee members including the Presiding Officer is present.

Interim Relief:

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

- Transfer the complainant or the respondent to any other workplace.
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled.
- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the employer will inform the committee regarding the same.

Termination of Enquiry:

The Committee at Hexagon Nutrition Ltd; may terminate the enquiry or give ex-parte decision, if the complainant or respondent respectively is absent for 03 (three) consecutive hearings, without reason. 15 days written notice shall be given to the party, before termination or ex-parte orders.

Procedure for Enquiry:

All proceedings of the enquiry shall be documented. The Committee interviews the respondent separately and impartially. The Committee shall state exactly what the allegation is and who has made the allegation. The respondent is given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings are prepared which may be shared with the respondent and the complainant upon request. Any witnesses produced by the respondent are also interviewed & statements are taken.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements.

In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry shall be completed, including the submission of the Enquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure ensures absolute fairness to all parties strictly following the principles of natural justice.

Enquiry Report Considerations:

While preparing the findings/recommendations, following shall be considered:

- Whether the language used (written or spoken), visual material or physical behavior was of sexual or derogatory nature;
- Whether the allegations or events follow logically and reasonably from the evidence;
- Credibility of complainant, respondent, witnesses and evidence;
- Other similar facts, evidence, for e.g. if there have been any previous accounts of harassment pertaining to the respondent;
- Both parties have been given an opportunity of being heard;
- A copy of the proceedings were 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 give them an opportunity to make a representation on the findings to the committee.

Action to be initiated after the Enquiry:

Post enquiry, the committee shall submit its report containing the findings and recommendations to the employer within 10(ten) days of completion of the Enquiry.

The findings and recommendations are reached from the facts established and is recorded accurately.

If the situation so requires, or upon request of the complainant, respondent or witness, the Management at Hexagon Nutrition Ltd; may decide to take interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome.

Complaint Unsubstantiated:

Where the committee 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 committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the company.

Complaint Substantiated: Where the committee 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:

- i. Counseling
- ii. Censure or reprimand
- iii. Apology to be tendered by respondent
- iv. Written warning
- v. Withholding promotion and/or increments
- vi. Suspension
- vii. Termination OR
- viii. Any other action that the Management may deem fit. The employer at Hexagon Nutrition Ltd; shall act upon the recommendations within 60 days and confirm to the committee.

Post implementation of the actions, follow up with the complainant occurs to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring. This follow up shall be undertaken by the complainant's Line Manager supported by HR.

Malicious Allegations:

Where the committee arrives at the conclusion that the allegations 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 to take action against the woman or the person making the complaint.

The action recommended should be similar to the ones proposed for the respondent in case of substantiated complaints.

While deciding malicious intent, the committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

Confidentiality and Retaliation:

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

All IC Members, parties and any other personnel involved are duly bound to maintain secrecy about the case details.

Any person contravening the confidentiality clauses shall be subject to **Disciplinary Action** as prescribed in the Act.

Non-retaliation:

The Company assures that no one who, in good faith, lodges a complaint or participates in an inquiry will face retaliation in their job or work environment. Retaliation can include unfair performance evaluations, denial of promotions, spreading rumours, harassment, or ostracization of the complainant or witnesses. Such acts, if noticed, can be reported to HR or directly to the Managing Director. They will be treated as serious misconduct and punished accordingly. The immediate supervisors of both parties should also be sensitized (without giving them details if they're not aware of the case) that they must not allow any team dynamics that punish one side. The period after a complaint can be sensitive; HR will check in discreetly with the complainant post-case to ensure she is not facing any backlash. The IC can also decide to keep a watch. Our Company policy is clear: any retaliation or victimization will result in **disciplinary action**, which could be as severe as termination of the retaliator's employment.

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 and rules, within 90 days of the recommendations being communicated.

Documentation, Reporting, and Compliance Audits:

The Company places equal importance on post-investigation compliance – that is, proper record-keeping, statutory reporting, and readiness for audits by authorities (such as labour department inspections or corporate governance audits by other bodies). This section details the practices for disposal of cases (record management), annual reports, and coordination with regulatory agencies.

Documentation and Record-Keeping: Every sexual harassment complaint and the subsequent proceedings generate confidential records.

The following documents will be maintained by the IC/HR for each case:

- The original written complaint along with any attachments (emails, photos, etc. provided).
- The formal acknowledgment of receiving the complaint (if issued).
- Notices sent to the respondent and witnesses (with dates).
- Written reply from the respondent, if any, and any evidence submitted by respondent.
- Minutes of IC meetings/hearings – a summary of each meeting, who was present, statements made (or verbatim transcripts if taken), and any interim orders. If the IC obtained signed statements from witnesses or parties, those are kept on file.
- Copies of any interim relief recommendations and the employer's action taken report on those (for instance, letter granting leave to complainant, or transfer order of respondent).
- The final Inquiry Report (signed by IC members).
- Proof of delivery of the report to the parties (like email read receipts or acknowledgment signatures).
- The employer's decision/action letter based on the report (e.g., termination letter, or closure intimation if not proved).
- If applicable, any appeal documentation (though the appeal would be external, if the Company is informed of an appeal or receives a notice from a court/tribunal, that will be recorded too).

These records will be maintained by the Head of HR or a designated Custodian (often the Presiding Officer or the POSH compliance officer if one is designated). All records will be kept securely and confidentially. By law, there's no explicit retention period specified for POSH case documents, but as a best practice, the Company will retain all case files for at least 3 years from the date of conclusion of the proceedings. In case of any ongoing litigation or investigation, records will be kept until that is resolved even if beyond 3

years. The records may be kept in physical files (locked cabinet) or scanned and stored in an access-restricted folder.

These documents are not to be shared internally except on a need-to-know basis (e.g., if a new IC member takes over mid-case, they get access; or if HR needs to enforce actions). They are certainly not accessible to general employees to “check what happened” – no, confidentiality is paramount.

POSH Annual Report (Internal Committee Annual Report):

Each Internal Committee is required by Section 21 of the POSH Act to prepare an Annual Report at the end of each calendar year and submit it to the employer and the District Officer (a local government authority appointed under the Act). The Head Office IC can also compile a Company-wide report, but each IC should cover its own jurisdiction. The Annual Report will contain the following information as specified in Rule 14 of the POSH Rules:

1. Number of sexual harassment complaints received in the year. (If none were received, it should explicitly state zero. This shows whether employees are coming forward and is a compliance indicator.)
2. Number of complaints disposed of during the year. (Disposed means a final decision was made by the IC and action taken by employer. Some could be from previous year and concluded this year, that counts too.)
3. Number of cases pending for more than 90 days. (Ideally zero – this entry tracks delays. If any inquiry took longer than 90 days, the number of such cases is reported, with possible reasons to be given to authorities if asked.)
4. Number of workshops or awareness programs carried out on sexual harassment. (The Act emphasizes preventive awareness. So, each IC will list how many trainings or sensitization sessions were conducted for employees, and perhaps for IC members’ training as well. For example, “2 awareness sessions for all staff at Unit X, and 1 special training for IC members” etc.)
5. Nature of action taken by the employer or District Officer in cases. (This part summarizes outcomes – e.g., “One case: respondent warned; second case: respondent terminated; third case: complaint withdrawn via conciliation;” etc. It may also note if any cases were forwarded to police or dealt by District Officer.)

This Annual Report for the IC is distinct from the company’s Annual Report to shareholders, but the Company must file it with the District Officer of the area. Typically, the report is prepared for the calendar year (January–December) and submitted by January

of the following year. (Many state rules expect submission by 31st January). Internally, HR will remind all ICs at year end to compile their data. The report should be signed by the Presiding Officer of the IC. One copy remains with the Company (HR files), and another is sent to the District Officer (usually the District Magistrate/Collector or an official designated as such under the Act for the local district).

If the Company has multiple ICs, either each sends to the District Officer of their respective location, or a consolidated report is forwarded to each relevant District Officer covering information of units in their jurisdiction. We will follow the locally applicable protocol. The content can be minimal (just the numbers) unless the state authority provides a format.

Audit Readiness of Reports: The Company should be ready to produce these annual reports as proof of compliance. Not submitting the annual report to the District Officer can attract penalties. The IC annual reports are internal documents but can be requested by labour inspectors to verify compliance. We maintain copies of reports submitted and any acknowledgment from the District Officer's office.

Disclosure in Company's Annual Report (Board of Directors' Report):

As a listed entity, Hexagon Nutrition Ltd. is required to give a statement in its Annual Report (specifically in the Board of Directors' Report that accompanies financial statements) that it has complied with the POSH Act. The Ministry of Corporate Affairs via a 2018 amendment to the Companies (Accounts) Rules made this mandatory. The Board's report should include a declaration that: "The Company has in place an Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and that the Company has complied with provisions of the Act, along with details of the number of cases filed and disposed during the year." Often, companies include a short paragraph mentioning how many complaints were received and resolved in the financial year. For example, it might state: "During the financial year, the Company received 1 complaint of sexual harassment, which has been investigated and resolved as per the POSH Act. No cases were pending as on year-end. The Company's Internal Committees are duly constituted and functional." If no complaint was received, it would say "no cases were reported."

This disclosure serves to inform shareholders and regulators that the Company is compliant and has a safe workplace. Not making this disclosure can result in penalties under the Companies Act (fines on the company and officers). The HR or Compliance officer will ensure that these details are communicated to the Company Secretary in time

for drafting the Board report each year. We will use the data from the IC's annual reports for accuracy.

External Audit and Inspection Readiness:

From time to time, the Company may be subject to labour law inspections or audits (for example, a Labour Commissioner's office might check POSH Act compliance, or an internal audit by the Company's compliance team or an external agency might review HR compliance). The following measures ensure that we are always "audit-ready":

- **POSH Compliance Checklist:** The HR Compliance team maintains a POSH checklist including: IC constitution orders (with current member names and dates of appointment), training records, copies of this POSH policy circulation (e.g., email to all staff, notices on boards), sample payslip or notice showing external member honorarium paid (if any) etc. This shows we have set up the mechanism. **The checklist also covers case handling:** whether any case was handled in last year and if all steps (notice, inquiry, report, action, etc.) were documented.
- **Display and Notices:** Auditors may check that the workplace displays required information (like the POSH policy abstract and IC members' contact details). We will ensure that at each unit, a notice board or intranet page has up-to-date IC member details and a statement of zero tolerance.
- **Training records:** Keep evidence of employee trainings (dates, topics, attendance or e-learning completion data) and IC trainings. These demonstrate our preventive efforts.
- **Annual Report filings:** Keep copies of all Annual reports sent to District Officers (and any proof of submission like postal receipt or email).

Employer/Executive Director ensures that: the process mentioned above is followed.

Human Resources ensure the following:

- Copy of the report is given to the complainant and the respondent
- That action is taken, if the wrong allegation is made by the complainant or any other person or the witnesses
- Any other action that needs to be taken as per the report submitted by the IC At the overall level, HR maintains all documentation on the above and follow-up on the terms of settlement and submits a quarterly report to Employer.

Duties of the Employer/Sr. Management:

- Provide a safe working environment at the workplace which also includes employees, visitors, clients or any other internal or external individuals.
- Provide necessary facilities to the IC for dealing with the complaint and conducting the enquiry.
- Include all the cases of sexual harassment and the action taken in the Annual Report
- Treat sexual harassment as a misconduct under the Standards of Conduct.

Duties of the HR:

- Display at conspicuous place in the workplace, the penal consequences of sexual harassment.
- Organise workshops and awareness programmes at regular intervals for sensitizing the employees about the policy.
- Organise orientation programmes for the members of IC.
- Assist in securing the attendance of the respondent and the witnesses before the IC.
- Provide assistance to the Complainant if he/she chooses to file a complaint in relation to the offence under the Indian Penal Code.
- Assist the Complainant to initiate action under the Indian Penal code against the perpetrator who is not an employee in the workplace where the sexual harassment has taken place.
- Monitor the timely submission of reports by the Internal Complaints Committee.
- The POSH policy is to be communicated to all the external collaborators, on contract, trainees, interns, suppliers or vendors, consultants, visitors, community workers etc.

ANNEXURE “A”**Hexagon Nutrition Ltd. Corporate & Manufacturing Plant Locations**

Hexagon Nutrition Ltd.	Address
Head Office, Mumbai	404, Global Chamber, Adarsh Nagar, Link Road, Andheri (W), Mumbai, Maharashtra – 400053, India. Tel. No. +91-22-62136710/711
Nashik – Plant	Plot no. 92, Unandanagar, Lakhampur, Tal. Dindori, Nashik – 422202, Maharashtra, India.
Chennai – Plant	Plot no. B-11, Phase -1, MEPZ – SEZ, Tambaram, Chennai – 600045, Tamil Nadu, India. Tel no. +91-44-22625250

ANNEXURE “B”**Internal Committee at Hexagon Nutrition Ltd.****MUMBAI HO:**

Sr. No.	Name	POSH Committee	Contact No.	Email Id
1	Ms. Kishori Prakash Pathare	Presiding Officer	8879116190	kishori.p@hexagonnutrition.com
2	Mr. Santosh Patole	Member	9987340341	santosh.p@hexagonnutrition.com
3	Mr. Muzaffar Raza Hasan Qureshi	Member	9172633840	muzaffar.q@hexagonnutrition.com
4	Adv. Pratima Thakur	External Member	9890928883	pratimathkr449@gmail.com

NASHIK OFFICE:

Sr.	Name	POSH	Contact No.	Email Id
1	Ms. Suvarna Date	Presiding Officer	8879213762	suvarna.d@hexagonnutrition.com
2	Mr. Abdul Suban	Member	9791045981	subhan.s@hexagonnutrition.com
3	Mr. Tushar Katkade	Member	7208875359	tushar.k@hexagonnutrition.com
4	Adv. Pratima	External Member	9890928883	pratimathkr449@gmail.com

CHENNAI OFFICE:

Sr.	Name	POSH	Contact	Email Id
1	Ms. Preethe M. S.	Presiding Officer	9790703071	preethe.m@hexagonnutrition.com
2	Mr. Rajapandian	Member	9940016825	rajapandian.p@hexagonnutrition.com
3	Mr. Muthiah	Member	6380662726	muthiah.k@hexagonnutrition.com
4	Adv. Pratima	External Member	9890928883	pratimathkr449@gmail.com

ANNEXURE “C”**'Format for submitting Complaint under POSH Policy'****(to be submitted in original)****(Page 1 of 3)**

To,

Name of the organization ("Company") POSH Internal Committee

Sub: Complaint under The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act (' POSH Ac ') and the POSH Policy of the Company.

Please fill in English or Regional language

Full Name of Complainant/My Name:	
My Permanent Residential Address of Complainant	
Communication Address of Complainant	
Tel No. of Complainant/My phone number:	
Location of Company	
Name of person against whom Complaint is being made i.e. Respondent/s	
Date(s) when incident took place	
In case Complainant does not know to read and / or write, full name, phone no., permanent address and signature of the person who has assisted her in writing the Complaint	

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(Page 2 of 3)

Details of Incident:

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I hereby declare and undertake that:

- i) I have understood the contents of my complaint.
- ii) All the facts, statements and information provided by me are out of my free will.
- iii) My complaint is true and without any malicious intent against anyone, without any coercion or threat, undue influence from anyone.
- iv) I further state that my accompanying statement is signed by me in a sound mind and legal capacity and I shall attend IC enquiry proceedings, as otherwise IC may be forced to hold ex-parte enquiry and judgement.
- v) I shall not to directly or indirectly contact Respondent or his family or friends or associates, to influence him.
- vi) I shall not to directly or indirectly discuss the matter with any co-Complainant and / or try to influence any co-Complainant, in any manner during/after enquiry procedure.
- vii) I shall not directly or indirectly use threat, or force against man/men against whom I have filed, the IC or any other person, in any manner during/after enquiry procedure.
- viii) I shall not directly or indirectly influence and / or seek and or accept monetary or other benefit from the man/men against whom I have filed complaint i.e. Respondent in any manner during/after enquiry procedure.
- ix) I shall not directly or indirectly tamper with evidence or cause others to tamper with evidence, if any.
- x) I shall not directly or indirectly influence my Witness or Respondent's Witness by force or giving monetary or other benefit.
- xi) I will abide by the clause of confidentiality and other rules of the POSH Act and other prevailing policies and rules of the Company including POSH Policy. The contents of the complaint, information about complainant, respondent, witness, evidence and any information regarding the inquiry and outcome of the complaint

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are confidential, shall not be discussed with and or disclosed to anyone by me, and shall not be made public by me.

Signature / Thumb
Impression & Name of
Complainant:
Complaint Date:

Signature and Date of Permitted Recipient
(in case Complaint handed over to Permitted Recipient
instead of IC) / Name of Permitted Recipient.

For & on behalf of Hexagon Nutrition Ltd;

Authorised Signatory / Director

Name:
Designation:
Date:
Place:

Document Control:

Document Title: Posh Policy
Company Name: Hexagon Nutrition Ltd.
Version No: 1.0 (New Policy)
Policy Approved By: Board of Directors
Date of Approval: 26/06/2026
Effective Date: 01/07/2026