



Nahar

POLY FILMS LTD.



Regd. Office : 376, Industrial Area-A, LUDHIANA-141 003 (INDIA)

Phone : 91-161-2600701 to 705, 2606977 to 978, Fax : 91-161-2222942, 2601956

E-mail : pkvashishth@owmnaahar.com Website : www.owmnaahar.com CIN No. : L17115PB1988PLC008820

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Effective Date: April 2026.

Next Review Date: March 2027.

COMMITMENT:

Nahar Poly Films Limited is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

Nahar Poly Films Limited is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

Nahar Poly Films Limited will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

SCOPE:

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees, consultant and on contract. Nahar Poly Films Limited will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or Factory premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premise.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.



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DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- Sexually coloured remarks.
- Indirect or direct demand of sexual favors.
- Repetitive calls/ missed calls.
- Stalking in the factory or outside.
- Showing pornographic pictures or videos.
- Luring with gifts and favors.
- Dual meaning comments.
- Verbal abuse and shouting (screaming).
- Unnecessary touching or physical contact.
- Purposely/intentionally making female workers work late.
- Dropping hints – during handshakes, while complementing, through gestures etc.
- Asking comments on his own appearance (if he is looking handsome or not).
- Unnecessary compliments on the individuals clothes and dressing sense etc.
- Sending sexual jokes on social media (whatsapp, facebook etc.).
- Creating hostile work environment (increase of work pressure, taking out unnecessary faults in the work etc.).
- Inquiring about personal life.
- Asking phone number or address.
- Proposing for friendship or dates.
- Offering lifts or volunteering to drop home.
- Sudden absenteeism of female worker – could be an indication of sexual harassment.
- Unnecessary favours – extra OT hours, Sunday work etc.
- Sending lewd notes or messages.
- Getting too pally with young unmarried female workers.
- Unnecessary concerns or care shown to migrant female workers.
- Spreading false rumors about the female workers character or personal life.

Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.



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RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of the Nahar Poly Films Limited have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “**Internal Complaint committee**” has been created in the Company for time-bound redressed of the complaint made by the victim.

COMPLAINTS COMMITTEE:

The Company has instituted a Internal Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

. The Internal Complaints Committee should be headed by four member committee a Presiding officer (woman) and one male & one female member and Further, to prevent the possibility of any undue pressure or influence from senior levels, such Complaints Committee should involve a third party, either NGO or ladies advocate or other body who is familiar with the issue of sexual harassment

1. Women Personnel from HR Department Ms. Renu Bala (**Presiding Officer**)
2. Two Management/Senior Female employee Ms. Kirti & Ms. Sophia (**Members**)
3. One Management employee male Mr. Anil Sharma (**Member**)
4. Member from (External) an NGO or Ms. Manakshi Sharma (**External Member**)
5. Two women's Workers Member Ms. Kamlawati & Ms. Paramjeet (**Members**)

The Complaints Committee is responsible for:

- ✓ Investigating every formal written complaint of sexual harassment.
- ✓ Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- ✓ Discouraging and preventing employment-related sexual harassment.



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PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT:

Nahar Poly Films Limited is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Informal Resolution Options When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints:

1. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department they are working in, to enable the Presiding Officer to contact them and take the matter forward.
2. The Presiding Officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

3. If the Presiding Officer of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, he/ she will proceed to investigate the allegation with the assistance of the Internal Complaints Committee.



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4. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.
5. The Complaints Committee shall conduct such investigations in not later than 90 days from the date of receipt of the complaint.
6. The Complaints Committee shall submit a written report containing the findings and recommendations to the Managing Director not later than 10 days from the investigation complete.
7. The Managing Director will ensure that corrective action on the recommendations of the Internal Complaints Committee to be done within 60 day.
8. Corrective action may include any of the following:
 - a. Formal apology
 - b. Counseling
 - c. Written warning and a copy of it maintained in the employee's file.
 - d. Change of work assignment / transfer for either the department or the unit.
 - e. Suspension or termination of services of the employee found guilty of the offence.
 - f. Increment hold.
 - h. Promotion hold.
9. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

(For more details, refer to the pictorial representation of the process flow given in Annexure A)

CONFIDENTIALITY:

Nahar Poly Films Limited understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.



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To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

PROTECTION TO COMPLAINANT / VICTIM:

Nahar Poly Films Limited 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.

Nahar Poly Films Limited 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.

CONCLUSION: In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.