

HR/VCL-India/1-Oct-2026 | POSH

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

Department	Human Resource
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Author	HR
Approved by	R N Ghosal, Managing Director
Effective Date	01-10-2026

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R N Ghosal 	Revision Date: 01-10-2026	

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I. Purpose

Veedol Corporation Limited “The Company” is committed to provide its employees a safe, healthy and harassment-free workplace. In an effort to continue to maintain a harassment-free workplace, the Company has drafted this policy which is in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The purpose of this policy is to protect all female employees from sexual harassment at the workplace and provide a redressal mechanism for complaints of sexual harassment and matters related to it.

II. Scope

This Policy extends to:

1. All the sites and branches operating in India
2. All individuals who are either
 - a. Employees
 - b. Workers
 - c. Consultants
 - d. Trainees (on probation, permanent or contractual basis)
 - e. Customers
 - f. Clients
 - g. Suppliers or
 - h. Anyone who has a business relationship with Veedol
3. All interactions arising as a result of employment with Veedol whether the incident has occurred during or beyond office hours.
4. While the POSH Act specifically protects women, the organization is committed to maintaining a respectful and safe workplace for all employees irrespective of gender identity. Any complaint of harassment raised by any employee will be taken seriously and addressed through appropriate mechanisms.

III. Definitions

1. **POSH Act:** The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
2. **Organization:** Veedol Corporation Limited
3. "Aggrieved" shall have the meaning assigned under the POSH Act.
For the purpose of maintaining a respectful workplace, complaints by employees of any gender may be addressed through appropriate organizational mechanisms, subject to applicable law.
4. **Complainant:** A person who files a complaint of sexual harassment suffered or caused to her or to any other person with the permission of the complainant or her legal heir
5. **Respondent:** Against whom the complaint is given
6. **Employer:** The person(s) responsible for the management, supervision and control of the workplace and discharging contractual obligations with respect to their employees.

7. **Workplace:** Workplace includes any place visited by the employee arising out of or during the course of employment which are:

- All office premises
- All locations where work related activities take place, like client and supplier locations, conferences, seminars, training and meetings
- Transportation provided by the employer, like office cab or bus
- Communication medium provided by the employer, like office email, chat tools or phone
- Office sponsored entertainment, like team dinner, outing or annual party
- Office provided accommodation or stay, like hostels, guest houses or hotel rooms.
- When an employee is working remotely or from home, those spaces are also considered workplace.
- Social events which are not organized by the organization are excluded from the purview of this Policy.

In case, an employee is subject to sexual harassment from a co-worker at a social event, then required action under this Policy will be taken against such concerned individuals if:

1. The incident can affect the reputation of the organization.
2. The incident can create a hostile, toxic or intimidating environment at the workplace.
3. The incident can have an adverse effect on a person's ability to discharge their duties related to employment.

8. **Sexual harassment:** Any unsolicited and unwelcome (direct or implied) physical, verbal or nonverbal act of sexual nature that include but are not limited to:

- Derogatory comments on a person's look, body or clothing
- Flirting or pursuing someone against her will
- Discussing about one's private life or asking questions about other's private life
- Sharing or showing offensive images, videos or text messages
- Uncomfortable or unwelcome physical contact or advances
- Stalking
- Spreading rumors of sexual nature about other employees
- Physically blocking a person's movement
- Staring at a person making the person uncomfortable
- Making sexually offensive gestures, sexually colored remarks or facial expressions
- Any (one or more) of the following circumstances, if it occurs or is present in relation or connected with any behaviour that has explicit or implicit sexual undertones implied or explicit promise of preferential treatment as quid pro quo for sexual favours
- Implied or explicit threat of detrimental treatment in the conduct of work
- Implied or explicit threat about the present or future status of the person concerned.
- Creating an intimidating offensive or hostile work environment.
- Humiliating treatment likely to affect the health, safety dignity or physical integrity of the person concerned.
- Physical contact and advances
- Demand or request for sexual favours

- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

IV. Internal Committee

1. The Company has formulated an Internal Committee (hereafter referred to as IC) as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The IC will receive and redress complaints of sexual harassment.
2. The IC consists of :
 - Presiding Officer who is a woman employed at senior level.
 - Internal Members who are employees
 - An External Member from an NGO/Association preferably committed to the cause of women or who have had experience in social work or legal knowledge
3. At least 50% of the members of the IC will be women. The role of IC is explained in Annexure I.
4. A quorum of minimum three members will be present for the proceedings to take place.
5. The IC members will be replaced every three years as per the POSH Act.
6. The Company has an Internal Committee representing the whole country.

V. Lodging a Complaint

1. Any aggrieved who is subject to sexual harassment at workplace should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. If the aggrieved cannot directly approach alleged harasser(s), they can file a complaint with one of the IC members in writing.
2. Deadline to file a complaint: The complaint needs to be filed within 3 months from the date of the incident. In case there is a series of incidents, complaint should be filed within 3 months from the date of the last incident.
3. The IC may extend the filing period by a further period not exceeding three months, for reasons to be recorded in writing.
4. Anonymous complaints may not be treated as formal complaints under this Policy; however, the Company may review the information and take appropriate preventive or administrative measures where warranted.
5. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of the IC, will render all reasonable assistance to the aggrieved for making the complaint in writing.
6. Inability of the aggrieved to file a complaint:
Provided that the aggrieved is unable to file the complaint due to physical incapacity, complaint can be filed by
 - a. A friend or a relative
 - b. A co-worker
 - c. An officer of NCW or State Women Commissions or

- d. Any person who has knowledge of the incident with the written consent of the aggrieved provided that the aggrieved is unable to file the complaint due to mental incapacity, complaint can be filed by
 - a. A friend or a relative
 - b. A special educator
 - c. A qualified psychiatrist or psychologist
 - d. The guardian or the authority under whom the aggrieved is receiving treatment or care or
 - e. Any person who has knowledge of the incident jointly with her relative, friend, a special educator, qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care. Provided that the aggrieved is unable to file the complaint for any other reason, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the aggrieved. Provided that the aggrieved is dead, a complaint can be filed by any person who has knowledge of the incident with the written consent of aggrieved person's legal heir.
- 7. Upon receipt of the complaint, the IC will forward a copy of the complaint to the respondent within 7 days from the date of receipt of the complaint.
- 8. Upon receipt of the copy of the complaint, the respondent must file their reply to the Internal Committee with the names and contact details of the witnesses and documents that can serve as evidence within ten working days.

VI. Conciliation

- 1. Upon the receipt of the complaint, at the request of the aggrieved, the IC will take steps to resolve the matter through conciliation.
- 2. Resolution through conciliation will happen within 30 days from the receipt of the complaint.
- 3. The proceedings will be recorded in writing. No settlement for monetary compensation will be executed. A copy of such settlement will be provided to the employer, the complainant and the respondent.
- 4. If a settlement is arrived, no further inquiry will be conducted by Internal Committee.

VII. Inquiry

- 1. The inquiry will follow principles of natural justice.
- 2. In case no settlement is arrived at, or the settlement arrived at in conciliation is not complied with, then the matter will be inquired by the IC. The same will be communicated to the complainant and the respondent.
- 3. If the complainant and/or the respondent desires to present witnesses and evidence, they should communicate this in writing to the IC.
- 4. If the Complainant and/or the Respondent desires to produce any documents as evidence they should provide original copies of the same. Evidence in digital/electronic form will be forwarded to the IC in such manner ensuring that the same is not tampered.

5. In case there is a high likelihood for any of the Internal Committee members to be biased in the inquiry or exhibiting conflicting interests with respect to the complaint, they must recuse themselves from the inquiry. Final decision on any perceived or apparent conflict of interest of an IC Member brought forward by the complainant, respondent, witnesses or other IC members will be taken by the Presiding Officer. In case of any perceived or apparent conflict of interests in any IC Member, the team of Internal Committee members that will hear a specific case will be structured by the Presiding Officer.
6. The Internal Committee will conduct the inquiry following the principles of natural justice. Both the complainant and respondent will be given adequate opportunity to explain their sides in the case and cross-examine the other party and their witnesses.
7. The IC will complete the Inquiry, in-person or virtually, within three months from the receipt of the complaint.
8. All the findings of the IC will be shared with the complainant and respondent before the Inquiry Report is prepared. If the complainant and the respondent have any objections with the inquiry report, they can inform the same to the Internal Committee.
9. The IC will prepare and submit the inquiry report along with its findings and recommendations to the employer within 10 days from the completion of the inquiry. A copy of the inquiry report is shared with the complainant and respondent.
10. Employer will implement the recommended actions within 60 days from the receipt of the inquiry report.
11. In case the complainant communicates her desire to file a complaint with the police before, during or after the inquiry, the IC will support her to do so.

VIII. Interim Measures

1. During pendency of inquiry, based on the requests made by the complainant, the IC may allow interim relief which could include:
 - Preventing the respondent from assessing the complainant's work performance
 - Permitting paid leave to the complainant for a maximum of 3 months, in addition to the leave that the employee is entitled to.
 - Transfer the complainant/respondent to a different location.
 - Other relief as may be appropriate.

IX. Unsubstantiated Complaint

The complaint is unsubstantiated if the IC arrives at the conclusion that the allegation against the respondent has not been proven, and that no action is required to be taken in this matter.

X. Substantiated Complaint

1. The complaint is substantiated if the IC arrives at the conclusion that the allegation against the respondent has been proven. It recommends necessary action which may include:

- Suspension
- Termination
- Written warning
- Withholding promotion and/or increments
- Apology to be tendered by respondent
- Censure or reprimand
- Counselling
- Or any other action that the IC may see fit.

XI. False Complaint

1. If the IC arrives at the conclusion that the complainant or any other person has made allegation that are malicious or has produced forged or misleading documents/evidence, it may recommend to the employer to take action against the person for making false allegation.
2. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

XII. Retaliation

1. Organization prohibits any form of retaliatory or discriminatory behaviors against:
 - Files a complaint
 - Participates in an inquiry
 - Provides evidence or testimony
2. If the IC notices that any person indulges in retaliation or discrimination against the complainant or the witness, it will recommend the employer to take strict action against the guilty.
3. Any individual who experiences retaliation or discrimination for reporting or testifying a sexual harassment complaint should bring it to the notice of the IC.

XIII. Confidentiality and Privacy

1. The IC will maintain a register to endorse the complaint received by it and keep the contents confidential. The information related to the complaint will be shared only on a need-to-know basis.
2. Organization will strive to maintain confidentiality with respect to any information related to the aggrieved, respondent, witnesses.
3. Anyone who violates the confidentiality clauses will be subject to action as per the POSH Act.

XIV. Appeal

Any person aggrieved with the findings and/or recommendations of the IC as mentioned above, and/or the non-implementation of such recommendations, may prefer an Appeal to the Court or Tribunal in accordance with the applicable provisions of the POSH Act.

XV. Responsibility of the Employees

1. All employees must ensure that their conduct is in accordance with this policy.
2. All employees should read the policy. In case of any questions regarding the policy or the POSH act, employee should seek clarification from any of the IC members.

XVI. Applicable Law

The Sexual Harassment of Women At Workplace (Prevention, Prohibition And Redressal) Act, 2013

XVII. Third Party Harassment

If sexual harassment occurs involving a third party such as a client, vendor, contractor or visitor, the organization will take necessary steps to support the affected employee and address the situation with the concerned party.

XVIII. Awareness & Training

The organization will conduct regular awareness sessions, training programs, and orientation for employees and Internal Committee members regarding prevention of sexual harassment.

XIX. Annual Reporting

The Internal Committee will prepare an annual report containing number of complaints received, disposed of, pending cases, and awareness programs conducted, in compliance with statutory requirements.

XX. Governance and Reporting

As a measure of good governance, the Managing Director and Audit Committee Chairman may be informed of the receipt of a complaint on a confidential basis without disclosure of detailed allegations, identities or evidence, except to the extent necessary for governance oversight, legal compliance or implementation of interim measures.

XXI. Review of Policy

This policy will be reviewed periodically by the Management and proposed changes shall be placed before the Audit Committee for its approval to ensure compliance with regulatory requirements and governance standards. However, matters such as re-constitution of the Internal Committee due to organizational changes could be approved by the Managing Director.

Annexure I

Role of the Internal Committee (IC)

1. Preventive Role

- Participate actively in PoSH awareness and sensitization programmes.
- Promote respectful workplace behaviour and gender sensitivity.
- Ensure visibility and accessibility of the PoSH Policy across all locations.
- Support and advise the employer in taking preventive initiatives to create a safe workplace.

2. Receiving Complaints

- Receive written complaints of sexual harassment from aggrieved women.
- Assist the aggrieved woman in drafting the complaint, wherever required.
- Ensure complaints are received within the prescribed timelines under the Act.
- Maintain strict confidentiality of the complaint and related information.

3. Preliminary Assessment

- Examine whether the complaint falls within the definition of sexual harassment under the PoSH Act.
- Verify jurisdiction, workplace applicability, and maintainability of the complaint.
- Decide the appropriate course of action — conciliation or formal inquiry — as per the Act and the complainant's consent.

4. Conciliation or Inquiry

- Facilitate conciliation only at the written request of the complainant (without monetary settlement).
- Conduct a fair, unbiased, and time-bound inquiry where conciliation is not opted for.
- Follow principles of natural justice and provide equal opportunity of hearing to both parties.
- Act as a **fact-finding body**, not a disciplinary authority.

5. Investigation & Inquiry Process

- Examine documents, evidence, and witnesses relevant to the complaint.
- Ensure proceedings are law-driven and evidence-based, not opinion-driven.
- Maintain neutrality, independence, and procedural fairness throughout the inquiry.

6. Confidentiality & Sensitivity

- Maintain confidentiality of:
 - Identities of parties
 - Inquiry proceedings
 - Evidence and findings
- Handle all matters with sensitivity, dignity, and respect for all parties involved.
- Prevent victimization or retaliation against complainants and witnesses.

7. Recommendations & Reporting

- Prepare a reasoned inquiry report with findings and recommendations.
- Submit the report to the employer within the prescribed timelines.
- Recommend appropriate disciplinary or corrective actions where misconduct is established.

8. Records Maintenance & Compliance

- Maintain complete case records and inquiry documentation securely.
- Prepare and support submission of the Annual PoSH Report.
- Support the employer during audits, inspections, and legal proceedings related to PoSH compliance.

9. Ethical Responsibility

- Act independently and without influence from management or parties involved.
- Maintain neutrality and fairness at all stages.
- Remember that the IC is a statutory, fact-finding body and not a disciplinary authority.

10. Internal Committee (IC) composition

The below changes in the IC composition region wise.

REGION: EAST

- | | | | |
|---|------------------------|---|-------------------|
| 1 | Shyamasree Bhar | : | Presiding Officer |
| 2 | Satya Ranjan Mohapatra | : | Member |
| 3 | Debdutta Basu | : | Member |

- 4 Anand Chatterjee : Member
- 5 Saumin Ali : External Member

REGION: NORTH

- 1 Rashmi Jaiswal : Presiding Officer
- 2 Rakesh Kumar Sinha : Member
- 3 Rajinder Kaur : Member
- 4 Shikha Gaur : Member
- 5 Saumin Ali : External Member

REGION: Corporate office & WEST

- 1 Madhushree Joshi : Presiding Officer
- 2 Monalisa Mondal : Member
- 3 Chetan Ramesh Shriram : Member
- 4 Vishmita Poojary : Member
- 5 Pratapsing Rajput : Member
- 6 Saumin Ali : External Member

REGION: SOUTH

- 1 Luann Maria William : Presiding Officer
- 2 S. Karthikeyan : Member
- 3 R. Amrithavalli : Member
- 4 S. Srinivasan : Member
- 5 Saumin Ali : External Member

Annexure II

Complaint Handling Process (PoSH Act, 2013)

1. Receipt of Complaint

- Complaint to be made in writing by the aggrieved woman to the Internal Committee (IC).
- Complaint to be submitted within **3 months** from the date of incident (extendable by another **3 months** for valid reasons).
- If the complainant is unable to write, the IC shall provide assistance.
- Complaint details to be acknowledged and recorded confidentially.

2. Preliminary Assessment

- IC examines whether:
 - The complaint falls under the definition of sexual harassment.
 - The incident occurred at the workplace or is work-related.
 - The IC has jurisdiction over the matter.
- If the complaint is not maintainable, the IC records reasons in writing and advises appropriate action.

3. Option of Conciliation

- Conciliation may be initiated **only at the written request of the complainant**.
- Monetary settlement is **not permitted** as a basis of conciliation.
- If conciliation is successful:
 - Settlement terms are recorded.
 - Copies shared with both parties and employer.
 - No formal inquiry is conducted.
- If conciliation fails, the IC proceeds with a formal inquiry.

4. Initiation of Inquiry

- Written notice of inquiry issued to the respondent along with a copy of the complaint.
- Respondent to submit a written reply within **10 working days**.
- IC ensures principles of natural justice and neutrality.

5. Inquiry Proceedings

- IC conducts hearings, examines documents, and records statements of parties and witnesses.
- Equal opportunity of hearing is provided to both complainant and respondent.
- Inquiry to be completed within **90 days** from receipt of complaint.
- Proceedings to be conducted in a sensitive, non-intimidating manner.

6. Interim Relief (if requested)

- IC may recommend interim measures during inquiry, such as:
 - Transfer of either party
 - Grant of leave to the complainant (up to 3 months)
 - Change of reporting structure
- Employer to implement recommendations and report compliance.

7. Inquiry Report & Recommendations

- IC prepares a reasoned inquiry report with findings.
- Report to be submitted to the employer within **10 days** of completion of inquiry.
- Recommendations may include:
 - Disciplinary action (if allegations are proved)
 - Corrective or preventive measures
 - Closure of complaint (if not proved)

8. Action by Employer

- Employer to act on IC recommendations within **60 days**.
- Ensure no victimization or retaliation against complainant or witnesses.

9. Confidentiality

- Identity of parties, witnesses, complaint details, and proceedings to be kept strictly confidential.
- Breach of confidentiality is punishable under the Act.

10. Record Maintenance & Reporting

- IC maintains case records and inquiry documentation securely.
- Details included in the **Annual PoSH Report** submitted to the employer and District Officer.
- Support employer during audits, inspections, or legal proceedings.

11. Appeal

- Either party may appeal against the recommendations within **90 days** to the appropriate authority as per service rules or labour laws.

Annexure III**Information to be included in Sexual Harassment Complaint****Designation:****Name OF Complainant:****Phone Number:****Email ID:****Date of complaint submission****Details of the aggrieved (if the complainant is filing the complaint on behalf of the aggrieved)**

Name of the aggrieved

Designation (if an employee)

Unit/Division/Department (if an employee)

Phone Number

E-mail address

Details of the complainant (if the complainant is filing the complaint on behalf of the aggrieved)

Name of the complainant

Designation (if an employee)

Relationship of the complainant with the aggrieved (friend, co-worker, etc.)

Unit/Division/Department (if an employee)

Contact number

E-mail address

Reason for the inability of aggrieved to file complaint

Details of the Respondent

Name of the respondent

Designation

Unit/Division/Department (if an employee)

Relationship of the respondent with the aggrieved (supervisor, co-worker, vendor, client, etc.)

Contact number

E-mail address

Details of the Incident

Date of the incident(s)

Description of the incident

In case of a series of incidents, list all the incidents along with the date of each

Witnesses and their contact details

Documents that serve as evidence

Name and contact details of any person(s) contacted by the aggrieved after the incident (If any) *and shall be effective from the date of approval.*



VEEDOL CORPORATION LIMITED

[formerly Tide Water Oil Co. (India) Limited]

CIN: L23209WB1921PLC004357

An ISO 9001:2015 Company

Veedol Corporation Limited (Formerly, Tide Water Oil Company (India) Limited)

Ref: VCL/IC-2026-27/CIR

Dated: 1st Oct 2026

CIRCULAR

Sub: Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) – revision of Internal Committee (IC)

This circular is issued to communicate the revision in the Internal Committee (IC) under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act), along with the appointment of the Nodal Officer, effective **1st June 2026 until 23 December, 2027.**

The updated composition of the IC across all regions and the details of the Nodal Officer are given below:

1. Internal Committee (IC) composition

The below changes in the IC composition region wise.

REGION: EAST

- | | | |
|---|---------------------------|---------------------|
| 1 | Shyamasree Mukherjee Bhar | : Presiding Officer |
| 2 | Satya Ranjan Mohapatra | : Member |
| 3 | Debdutta Basu | : Member |
| 4 | Anand Chatterjee | : Member |
| 5 | Saumin Ali | : External Member |

REGION: NORTH

- | | | |
|---|--------------------|---------------------|
| 1 | Rashmi Jaiswal | : Presiding Officer |
| 2 | Rakesh Kumar Sinha | : Member |
| 3 | Rajinder Kaur | : Member |
| 4 | Shikha Gaur | : Member |
| 5 | Saumin Ali | : External Member |

REGION: Corporate office & WEST

- | | | |
|---|-----------------------|---------------------|
| 1 | Madhushree Joshi | : Presiding Officer |
| 2 | Monalisa Mondal | : Member |
| 3 | Chetan Ramesh Shriram | : Member |
| 4 | Vishmita Poojary | : Member |
| 5 | Pratapsing Rajput | : Member |
| 6 | Saumin Ali | : External Member |

REGION: SOUTH

- | | | |
|---|---------------------|---------------------|
| 1 | Luann Maria William | : Presiding Officer |
| 2 | S. Karthikeyan | : Member |
| 3 | R. Amrithavalli | : Member |
| 4 | S. Srinivasan | : Member |
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VEEDOL CORPORATION LIMITED

[formerly Tide Water Oil Co. (India) Limited]

CIN: L23209WB1921PLC004357

An ISO 9001:2015 Company

2. Nodal Officer

The central nodal officer is **Ms. Babita Dhar**, effective 1st June 2026.

The email address for all nodal regions will continue to be the same:

- North: Nodalofficer.north@veedol.com
- South: Nodalofficer.south@veedol.com
- East: Nodalofficer.east@veedol.com
- West: babita.dhar@veedol.com

All employees are requested to take note of the above changes. The IC members and the Nodal Officer are available to address any concerns related to the POSH Act. For complaints or queries, employees may approach the respective Regional Presiding Officer or write to the Nodal Officer on the above email id's.

For **Veedol Corporation Limited**

R N GHOSAL
MANAGING DIRECTOR