CORPORATE POLICY

TAMILNADU PETROPRODUCTS LIMITED

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

(THE "POSH POLICY")

Version 1.0

Issued by the Human Resources Department

DOCUMENT CONTROL

Policy Name	Prevention, Prohibition and Redressal of Sexual Harassment (POSH) Policy
Policy Owner	Human Resources Department
Approved By	Managing Director
Version	1.0
Effective Date	21st October 2026
Next Review Date	01st September 2029
Review Frequency	Once every three years or earlier if required by law
Document classification	Internal / Confidential

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1. PREAMBLE

Tamilnadu Petroproducts Limited ("TPL" or "the Company") is committed to providing a safe, secure, healthy and dignified work environment free from sexual harassment, discrimination, intimidation and exploitation. The Company believes that every employee has the right to work in an environment that promotes equal opportunity, mutual respect and professional conduct.

TPL adopts a zero-tolerance approach towards sexual harassment and is committed to preventing, prohibiting and redressing acts of sexual harassment at the workplace.

This Policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and the Rules made thereunder.

2. PURPOSE

The purpose of this Policy is to:

- Prevent sexual harassment at the workplace.
- Promote a culture of respect and dignity.
- Provide an effective grievance redressal mechanism.
- Ensure timely and fair investigation of complaints.
- Comply with statutory requirements under applicable laws.

3. SCOPE AND APPLICABILITY

This Policy applies to:

- Permanent employees
- Probationers
- Temporary employees
- Fixed-term employees
- Contract workers
- Apprentices
- Trainees
- Interns
- Consultants
- Retainers
- Agency personnel
- Vendors and service providers
- Visitors
- Women visiting the workplace for any purpose

The Policy extends to all workplaces of TPL including:

- Registered Office
- Corporate Office
- Factory Premises
- Laboratories
- Warehouses
- Maintenance Workshops
- Company Guest Houses
- Company Transportation
- Offsite Locations
- Conferences and Training Programs
- Business Travel
- Virtual Meetings
- Work From Home Arrangements
- Emails, Messaging Platforms and Digital Communication Channels used for work purposes

> *Applicability threshold: An Internal Committee shall be constituted, and this Policy shall apply in full, at every workplace of the Company as required by Section 4(1) of the POSH Act.*
>
> *Statutory scope and internal standard: The POSH Act confers the statutory right of redressal on an aggrieved woman. Accordingly, a complaint made by an aggrieved woman shall be inquired into by the Internal Committee under this Policy and shall be recorded in the Company's statutory returns and Board's Report disclosures. The Company applies the same standards of conduct to every person at the workplace irrespective of gender; a complaint of sexual harassment made by a man or by a transgender person shall be inquired into under the Company's Code of Conduct and Certified Standing Orders, following the same principles of natural justice and the same timelines, but shall not be recorded or reported as a complaint under the POSH Act.*

4. DEFINITIONS

4.1 Aggrieved Woman

In relation to workplace a woman of any age, whether employed or not, who alleges that she has been subjected to any act of sexual harassment by the respondent.

4.2 Employee

A person employed at the workplace for any work on a 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, a probationer, a trainee, an apprentice, a consultant or a person called by any other name.

4.3 Respondent

A person against whom a complaint has been made by aggrieved woman under this Policy.

4.4 Employer

The Managing Director or any person responsible for management, supervision and control of the workplace.

4.5 Workplace

Includes all locations and situations arising out of employment, including transportation, travel, accommodation and virtual work environments.

4.6 Sexual Harassment

Any one or more of the following unwelcome acts or behaviour, whether committed directly or by implication: (i) physical contact and advances; (ii) a demand or request for sexual favours; (iii) making sexually coloured remarks; (iv) showing pornography; or (v) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature, as defined in Section 2(n) of the POSH Act.

4.7 Internal Committee (IC)

The committee constituted by the Company under Section 4 of the POSH Act at each of its workplaces, the composition of which is set out in Clause 7 and Annexure A.

4.8 Local Committee (LC)

The committee constituted by the District Officer under Section 6 of the POSH Act at the district level, which receives complaints made against the Employer and complaints from workplaces at which fewer than ten workers are engaged.

4.9 District Officer

The officer notified under Section 5 of the POSH Act by the appropriate Government for the district in which a workplace of the Company is situated, to whom the annual report of the Internal Committee is submitted under Section 21 of the POSH Act and before whom recovery proceedings under Section 13(4) read with Section 15 of the POSH Act may be initiated.

4.10 Presiding Officer

The woman employed at a senior level at the workplace who is nominated to head the Internal Committee under Section 4(2)(a) of the POSH Act.

4.11 Unwelcome Conduct

Conduct is unwelcome where it is neither solicited nor invited by the aggrieved woman and she regards it as undesirable or offensive. Whether conduct is unwelcome is to be assessed from the perspective of the aggrieved woman, and the absence of protest, refusal or complaint at the time does not by itself render the conduct welcome.

5. WHAT CONSTITUTES SEXUAL HARASSMENT

Sexual Harassment is defined in Clause 4.6. The categories set out below are illustrative of unwelcome acts or behaviour, whether direct or by implication, and are to be read subject to that definition:

Physical Conduct

- Physical contact and advances
- Unwelcome touching
- Attempted assault

Verbal Conduct

- Sexually coloured remarks
- Offensive jokes
- Comments about appearance or body
- Repeated requests for dates despite refusal
- A demand or request for sexual favours, whether or not linked to any employment benefit

Non-Verbal Conduct

- Showing pornography or displaying sexually explicit material
- Sending inappropriate emails, messages or videos
- Staring, stalking or intrusive conduct
- Offensive gestures

Quid Pro Quo Harassment

- Promise of promotion in exchange for sexual favours
- Salary benefits linked to sexual favours
- Threat of adverse employment action

Hostile Work Environment

Conduct that creates:

- Intimidation
- Humiliation
- Hostility
- Offensive work conditions
- Threat to health or safety

The following circumstances may also amount to sexual harassment:

- Implied or explicit promise of preferential treatment.
- Implied or explicit threat of detrimental treatment.
- Interference with work performance.

- Humiliating treatment affecting health or safety.
- Implied or explicit threat about her present or future employment status.

6. RESPONSIBILITIES OF STAKEHOLDERS

Employees

Every employee shall:

- Maintain professional conduct.
- Respect colleagues and visitors.
- Cooperate with investigations.
- Maintain confidentiality.
- Participate in awareness programmes.

Managers

Managers shall:

- Maintain a harassment-free workplace.
- Report complaints immediately.
- Prevent victimisation and retaliation.
- Support inquiry proceedings.

Human Resources Department

HR shall:

- Conduct awareness programmes.
- Facilitate POSH training.
- Support the Internal Committee.
- Maintain records and documentation.

Employer

The Employer shall:

- Provide a safe workplace.
- Constitute Internal Committees.
- Organise awareness programmes.
- Display at a conspicuous place in each workplace the penal consequences of sexual harassment and the order constituting the Internal Committee, as required by Section 19(b) of the POSH Act.
- Implement recommendations of the Internal Committee.
- Treat sexual harassment as a misconduct.

- Provide the Internal Committee with such facilities as it may require to deal with a complaint and conduct an inquiry, and assist in securing the attendance of the respondent and of witnesses.
- Provide assistance to the aggrieved woman if she chooses to file a complaint under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force.
- Monitor the timely submission of reports by the Internal Committee.

7. INTERNAL COMMITTEE (IC)

The Company shall constitute an Internal Committee in accordance with Section 4 of the POSH Act at every administrative unit or office of the Company located at a different place. The order constituting each Internal Committee shall be issued in writing by the Employer and displayed at a conspicuous place at the workplace concerned.

The Committee shall comprise:

- Presiding Officer – a woman employed at a senior level at the workplace amongst the employees. Where no senior level woman employee is available at that workplace, the Presiding Officer shall be nominated from any other office or administrative unit of the Company, and where she is not available there either, from any other workplace of the Company or from any other department or organisation.
- Not less than two Members from amongst the employees.
- One Member from amongst non-governmental organisations or associations committed to the cause of women, or a person familiar with the issues relating to sexual harassment, who shall have at least five years' experience in social work in the field of women's empowerment, or shall be familiar with labour, service, civil or criminal law, as prescribed by Rule 4 of the POSH Rules.

At least 50% of the members shall be women. Members shall hold office for a period not exceeding three years.

The Presiding Officer or any Member shall be removed from the Internal Committee where such person contravenes the confidentiality obligations in Clause 15, has been convicted of an offence or has an inquiry into an offence pending against them under any law for the time being in force, has been found guilty in any disciplinary proceeding or has a disciplinary proceeding pending against them, or has so abused their position as to render their continuance in office prejudicial to the public interest. Any vacancy so arising shall be filled by fresh nomination.

The composition of the Internal Committee is provided in Annexure A.

8. FILING OF COMPLAINTS

A written complaint shall be filed by aggrieved woman, in six copies together with supporting documents and the names and addresses of witnesses, shall be submitted to the Internal Committee within three months from the date of the incident. In case of a series of incidents, the complaint shall be filed within three months from the date of the last incident.

The Internal Committee may, for reasons to be recorded in writing, extend the period by a further three months.

Complaints may be submitted physically or through official email.

Where the aggrieved women is unable to make a written complaint, reasonable assistance shall be provided.

Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity, or death, or otherwise, a complaint may be made on her behalf by her legal heir or by any other person prescribed by Rule 6 of the POSH Rules, including her relative or friend, a co-worker, an officer of the National Commission for Women or of the State Women's Commission, or any person who has knowledge of the incident, with her written consent where such consent is required.

A complaint may also be filed through the SHe-Box portal (Link: https://shebox.wcd.gov.in/) maintained by the Ministry of Women and Child Development. The Human Resources Department shall register the details of each Internal Committee of the Company on the SHe-Box portal and shall keep those details current.

The Internal Committee shall not decline to inquire into a complaint made by an aggrieved woman of the Company on the ground only that the respondent is employed by a different employer. In accordance with the judgment of the Supreme Court in Dr. Sohail Malik v. Union of India (2025), the Internal Committee at the aggrieved woman's workplace has jurisdiction to inquire into such a complaint and shall forward its findings and recommendations to the respondent's employer for action.

9. CONCILIATION

Before initiating an inquiry, the Internal Committee may, at the request of the aggrieved woman, attempt conciliation.

No monetary settlement shall form the basis of conciliation.

Where settlement is reached:

- Settlement shall be recorded.
- Copies shall be provided to both parties.
- The settlement shall be forwarded to the Employer to take action as specified in the recommendation.
- No further inquiry shall be conducted unless settlement terms are violated.

10. INQUIRY PROCEDURE

The Internal Committee shall:

- Share one copy of the complaint with the Respondent within seven working days.
- Respondent shall file with documents, names and address of witness not exceeding ten working days from receipt of complaint.
- Provide both parties an opportunity to present evidence.
- Follow principles of natural justice.
- Conduct the inquiry with a quorum of not less than three Members, including the Presiding Officer, present at each sitting.

- Exercise, where necessary, the powers of a civil court under the Code of Civil Procedure, 1908 in respect of summoning and enforcing the attendance of any person and examining that person on oath and requiring the discovery and production of documents.
- Where the respondent is an employee, conduct the inquiry in accordance with the service rules applicable to the respondent, and in the absence of such rules, in the manner prescribed by Rule 7 of the POSH Rules.
- Make a copy of its findings available to both parties and allow each of them to make representations against those findings before the Employer.
- Minimum Quorum of 3 members need to be present at IC for Inquiry. No legal practitioner shall represent either party during proceedings.

The inquiry shall be completed within ninety days.

Where the aggrieved woman or the respondent fails, without sufficient cause, to attend three consecutive hearings, the Internal Committee may, after giving fifteen days' written notice, terminate the proceedings or give an ex-parte decision. The Internal Committee shall not grant an adjournment more than three times to either party.

11. INTERIM RELIEF

During the pendency of the inquiry, and on a written request made by the aggrieved woman, the Internal Committee may recommend to the Employer:

- Transfer of the aggrieved woman or of the respondent to any other workplace.
- Grant of leave to the aggrieved woman of up to three months, which shall be in addition to the leave she would otherwise be entitled to.
- Restraining the respondent from reporting on the work performance of the aggrieved woman or from writing her confidential report, and assigning that responsibility to another officer.
- Any other suitable relief.

The Internal Committee shall submit its recommendation for interim relief to the Employer in writing. The Employer shall implement the recommendation and shall send a report of such implementation to the Internal Committee.

12. INQUIRY REPORT AND RECOMMENDATIONS

The Internal Committee shall submit its report within ten days from completion of inquiry to employer.

The report shall be shared with both parties.

Where the Internal Committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter. An allegation that is not proved shall not, of itself, be treated as a false or malicious complaint.

The Employer shall act upon the recommendations within sixty days of its receipt by him.

13. DISCIPLINARY ACTION

Where the allegation against the respondent is proved, the Internal Committee shall recommend to the Employer that action be taken against the respondent for sexual harassment as a misconduct, in accordance with the Company's Certified Standing Orders and the service rules applicable to the respondent. Such action may include:

- Verbal warning
- Written warning
- Written apology
- Counselling
- Adverse performance record
- Withholding increment
- Withholding promotion
- Transfer
- Demotion
- Suspension
- Termination of employment
- Reprimand or censure
- Carrying out community service

> *The Internal Committee may also recommend that the Employer deduct from the salary or wages of the respondent such sum as the Internal Committee considers appropriate, to be paid to the aggrieved woman or to her legal heirs. In determining that sum, the Internal Committee shall have regard to the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman, the loss in career opportunity, the medical expenses incurred by her for physical or psychiatric treatment, the income and financial status of the respondent, and the feasibility of payment in a lump sum or in instalments, as required by Section 15 of the POSH Act.*
>
> *Where the Employer is unable to make the deduction on account of the respondent being absent from duty or having ceased to be in employment, the Employer shall direct the respondent to pay the sum to the aggrieved woman. If the respondent fails to pay, the Internal Committee may forward the order for recovery of the sum to the District Officer, who may recover it as an arrear of land revenue.*
>
> *Where the respondent is not an employee of the Company, the Company shall not be confined to the actions listed above and may, in addition, suspend or terminate the contract, engagement or access arrangement under which the respondent attends the workplace, debar the respondent and, where appropriate, the respondent's employer from the Company's premises and from future engagement, refer the findings and recommendations of the Internal Committee to the respondent's employer for disciplinary action, and take such action under Section 19(h) of the POSH Act as the aggrieved woman may desire.*

14. MALICIOUS OR FALSE COMPLAINTS

Where the Internal Committee concludes that:

- The complaint was malicious; or
- False evidence was knowingly produced,

appropriate action may be recommended against the aggrieved woman or against the person who made the complaint, in accordance with the service rules applicable to her or to him, and in the absence of such rules, in the manner prescribed.

Mere inability to substantiate a complaint shall not attract action.

Malicious intent on the part of the aggrieved women, or the knowing production of a forged or misleading document, shall be established only after a separate inquiry conducted in accordance with the procedure prescribed under the POSH Rules, in which the aggrieved women is given written notice and a reasonable opportunity of being heard. No action shall be recommended under this Clause before that inquiry has been completed.

Where a witness has given false evidence or produced a forged or misleading document during the inquiry, the Internal Committee may recommend action against that witness in accordance with the service rules applicable to the witness, and in the absence of such rules, in the manner prescribed.

15. CONFIDENTIALITY

The contents of the complaint, the identity and addresses of the aggrieved woman, the respondent and the witnesses, any information relating to the conciliation and inquiry proceedings, the recommendations of the Internal Committee and the action taken by the Employer shall not be published, communicated or made known to the public, press or media in any manner. The following shall accordingly remain confidential:

- Identity and address of the aggrieved woman
- Identity and address of the respondent
- Identity and address of the witnesses, and their statements
- Conciliation and inquiry proceedings
- Recommendations
- Action taken

Any person entrusted with a duty under the POSH Act who contravenes this Clause shall be liable for penalty in accordance with the service rules applicable to that person, or, where no such service rules exist, to a monetary penalty of ₹5,000 (Rupees Five Thousand) as prescribed under Rule 12 of the POSH Rules, in addition to any disciplinary action that the Company may take. Nothing in this Clause shall prevent the Company from disseminating information regarding the justice secured to any victim of sexual harassment, provided that the name, address, identity and any other particulars calculated to lead to the identification of the aggrieved woman, the respondent or the witnesses are not disclosed.

16. APPEAL

Any person aggrieved by the recommendations of the Internal Committee made under Clauses 12, 13, 14 or 15 of this Policy, or by the non-implementation of those recommendations, may prefer an appeal within ninety days of the recommendations. The appeal shall lie to the court or tribunal in accordance with the service rules applicable to that person, and where no such service rules apply, to the appellate authority notified under Section 2(a) of the Industrial Employment (Standing Orders) Act, 1946.

17. PROTECTION AGAINST RETALIATION

No person covered by Clause 3 of this Policy shall be subjected to retaliation, intimidation, victimisation or adverse treatment for:

- Filing a complaint in good faith.
- Participating in an inquiry.
- Acting as a witness.

Any retaliation shall invite disciplinary action.

18. AWARENESS AND TRAINING

The Company shall:

- Conduct induction training.
- Organise annual POSH awareness programmes.
- Conduct sensitisation programmes for managers.
- Display at a conspicuous place in each workplace the penal consequences of sexual harassment and the order constituting the Internal Committee.
- Carry out orientation and skill-building programmes for the members of the Internal Committee at regular intervals.
- Widely disseminate this Policy in a manner accessible to every person covered by Clause 3, including through induction packs, the Company intranet, notice boards and contractor briefings.

19. RECORD KEEPING AND REPORTING

The Internal Committee shall maintain records of:

- Complaints received.
- Investigations conducted.
- Actions taken.
- Awareness programmes conducted.
- The Internal Committee shall prepare an annual report for each calendar year and submit it to the Employer and to the District Officer, stating the number of complaints of sexual harassment received in

the year, the number of complaints disposed of during the year, the number of cases pending for more than ninety days, the number of workshops and awareness programmes carried out, and the nature of the action taken by the Employer.

- The Company shall include in its annual report the number of cases filed under the POSH Act and their disposal, as required by Section 22 of the POSH Act.
- The Human Resources Department shall furnish to the Company Secretary, within such time as the Company Secretary may require, the data necessary for the disclosures in the Board's Report mandated by Rule 8(5) of the Companies (Accounts) Rules, 2014 as amended by the Companies (Accounts) Second Amendment Rules, 2025 with effect from 14 July 2025, namely a statement that the Company has complied with the provisions relating to the constitution of the Internal Committee under the POSH Act, (i) the number of complaints of sexual harassment received during the financial year, (ii) the number disposed of during the financial year, (iii) the number of cases pending for more than ninety days.
- The Human Resources Department shall also furnish the data required for the Corporate Governance Report under Schedule V of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and for the Business Responsibility and Sustainability Report under Regulation 34(2)(f) of those Regulations.
- Complaint files, inquiry records, reports and recommendations shall be retained securely by the Presiding Officer, with access restricted to the members of the Internal Committee, for a period of not less than three years from the date of closure of the matter, in accordance with Rule 14 of the POSH Rules. All personal data collected in the course of an inquiry shall be processed, stored and erased in accordance with the Digital Personal Data Protection Act, 2023 and the Company's data protection standards.

20. CRIMINAL PROCEEDINGS AND ASSISTANCE TO THE AGGRIEVED WOMAN

Sexual harassment may also constitute an offence under the Bharatiya Nyaya Sanhita, 2023, which replaced the Indian Penal Code with effect from 1 July 2024. The provisions that may be attracted include Section 74 (assault or use of criminal force with intent to outrage modesty), Section 75 (sexual harassment), Section 77 (voyeurism), Section 78 (stalking) and Section 79 (word, gesture or act intended to insult the modesty of a woman).

Where the aggrieved woman chooses to file a complaint in relation to an offence under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force, the Company shall provide her with all necessary assistance in doing so, as required by Section 19(g) of the POSH Act.

Where the respondent is not an employee of the Company, the Company shall, if the aggrieved woman so desires, cause action to be initiated against the respondent under the applicable law at the workplace at which the incident of sexual harassment took place, as required by Section 19(h) of the POSH Act.

Proceedings before the Internal Committee are independent of any criminal proceedings arising out of the same facts. An inquiry under this Policy shall not be stayed, deferred or discontinued by reason only that a police complaint, investigation or criminal trial in respect of the same facts is pending.

21. POLICY REVIEW

This Policy shall be reviewed at least once every three years, and earlier upon any amendment to the POSH Act, the POSH Rules or any related law or regulation, upon any binding judicial pronouncement affecting its provisions, or upon any change in the organisational requirements of the Company. The Human Resources Department shall maintain an amendment log recording the version, the date of each revision, the nature of the changes made and the approving authority.

ANNEXURE A – INTERNAL COMMITTEE DETAILS

The Internal Committee details below shall be maintained and updated by the Human Resources Department whenever there is any change in membership, role or contact information.

PLANT - INTERNAL COMMITTEE DETAILS

Name	Designation	Role in IC	Contact Details
Jeevajothi R	Senior Executive	Presiding Officer	9790724979 sectionlab@tnpetro.com
Krithika D	Executive	Member	8825809038 hrsupport@tnpetro.com
E D Raja Rajan	Deputy General Manager	Member	9962277748 Rajarajan.ed@tnpetro.com
Prakash Kumar V S	General Manager	Member	8870820326 prakash@tnpetro.com
Priyanka Mukherjee	External Member	External Member	+91 95000 69280 Priyanka.Mukherjee@jagadevandmukherjee.com

CITY OFFICE - INTERNAL COMMITTEE DETAILS

Name	Designation	Role in IC	Contact Details
Sangeetha S	Assistant General Manager	Presiding Officer	9840122880 cs@tnpetro.com
Sridevi Gundumenu	Manager	Member	8886669030 mmhcd@tnpetro.com
Parthiban C	Chief Financial Officer	Member	7299009906 Parthiban.c@tnpetro.com
Sridharan S	Assistant Vice President	Member	9840925667 Sridharan.s@tnpetro.com
Priyanka Mukherjee	External Member	External Member	+91 95000 69280 Priyanka.Mukherjee@jagadevandmukherjee.com