



**Factory & Corporate Office :**

Kantharia Industrial Estate.

Survey No.: 90/3/2/B, Opp. Sopara Phata Police Station, At & Post-Pelhar,

N. H. No.8, Taluka - Vasai, Dist-Palghar, Pin: 401208.

CIN: L74140MH2010PLC205904

Phone: +91 8087042862



**POLICY ON SEXUAL HARASSMENT OF  
WOMEN AT WORKPLACE KNOWN AS  
"NAMAN IN-STORE (INDIA) LIMITED POSH  
POLICY"**

*Revised Policy Document Issued on: 04<sup>th</sup> June, 2025*





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**1. PREAMBLE :**

NAMAN IN-STORE (INDIA) LIMITED (hereinafter referred to as "NIPL" or "the Company") is committed to providing a safe, respectful, and inclusive work environment for all its employees, free from any form of sexual harassment. The Company upholds the dignity of every individual and strives to foster a workplace culture rooted in mutual respect, equality, and integrity.

This Policy on Prevention, Prohibition, and Redressal of Sexual Harassment at the Workplace ("POSH Policy") has been formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder. It outlines the Company's approach to preventing and addressing complaints of sexual harassment in a manner that is timely, fair, and sensitive.

The objective of this policy is not only to ensure compliance with the law but also to reflect the Company's steadfast commitment to maintaining a workplace that is safe, professional, and empowering for all individuals associated with it.

**2. OUR COMMITMENT:**

NAMAN IN-STORE (INDIA) LIMITED is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company 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.

Page 2

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### 3. DEFINITION AND INTERPRETATIONS:

#### 3.1. Sexual harassment:

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

Sexual Harassment at the workplace includes:

- a) unwelcome sexual advances (verbal - nonverbal, written or physical) or behaviour,
- b) Demand or request for sexual favours,
- c) any other type of sexually-oriented conduct,
- d) verbal abuse or 'joking' that is sex-oriented,
- e) Physical Contact and Advances including (But not Limited to) touching, Stalking, sounds which have explicit and / or Implicit sexual connotation / overtones, molestation
- f) Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing joke, demanding or offensive pictures, cartoons or other materials through emails SMS, MMS, gestures etc.
- g) 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.
- h) Implied or explicit promise of privileged treatment to employee in his/her employment.
- i) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes,
- j) Giving gifts or leaving objects that are sexually suggestive

- k) Persistent watching, following, contacting of a person; and
- l) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

### 3.1.1. "Virtual Sexual Harassment"

NIPL has moved to a virtual workspace be it staying in touch via smartphones or web callings, etc. With this change in the work environment, it is essential that the employees and managers conduct in a professional manner all such virtual interactions as well. A few of the guidelines on virtual interaction are as below.

#### Do's:

1. **Proper Attire** - Employees attending video conferences must be dressed appropriately as expected in a professional environment.
2. **Content of Conversation** - Keep the conversation specific to work areas, projects, deliverables.

#### Don'ts:

1. Employees should not attend video conferences wearing dresses such as vests, shorts, T-Shirts with suggestive phrases etc.
2. The background of the video call should be suitable. No poster with suggestive content or any other element should be visible during the video calls.
3. No inappropriate jokes should be made.

4. Managers must not insist that female colleagues log on to one-on-one video calls but have the option to take calls in "audio-only" mode.
  5. Late night video calls to be avoided. If it is a business emergency, then the employee can attend it on "audio only mode".
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- 3.2. **Employer:** A person responsible for management, supervision and control of the workplace
  - 3.3. **"Employee"** means a person employed at a workplace for any work on regular, temporary, adhoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
  - 3.4. **"Aggrieved woman"** means 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, temporary, visitors.
  - 3.5. **"Respondent means"** a person against whom a complaint of sexual harassment has been made by the aggrieved woman.
  - 3.6. **"Workplace":** In addition to the place of work all other offices and premises such as Head office / Branch offices, regional offices, Stores, RDCs, and Factories or other premises where NIPL' business is conducted, including guest houses and any place visited by the employee arising out of or during employment including transportation provided by NIPL for undertaking such a journey. It shall also include any place where the aggrieved woman or the respondent visits in connection with his/her





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work/meeting, during and/or arising out of employment/ contract/ engagement with Naman In-Store (India) Limited, including transportation provided for undertaking such a journey.

**4. SCOPE:**

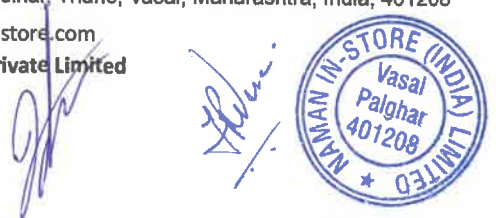
This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or client sites. The Company will not tolerate sexual harassment if engaged in by clients or suppliers or any other business associates.

**5. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:**

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this policy.

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

All managers at Company 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



## 6. COMPLAINT MECHANISM:

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

## 7. INTERNAL COMPLAINTS COMMITTEE (ICC):

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

The detail of the committee is notified to all covered persons at the workplace.

The committee comprises of:

- Presiding Officer woman** employed at a senior level in the organization or workplace.
- At least 2 members from amongst employees**, committed to the cause of women and or having legal knowledge.
- One external member**, familiar with the issues relating to sexual harassment;
- At least one-half of the total members are women;**

The Internal Complaints 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;



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

The Company 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 Internal Complaints Committee for redressed of their grievances. The ICC 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 Internal Complaints Committee constituted by the Management. The complaint shall have to be in writing and can be in form of a letter, preferably within **3 months** from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternatively, the employee can send a complaint through an email to [posh@nipl.co](mailto:posh@nipl.co) the employee is required to disclose their name, department, division, and location 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 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.
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 a timely manner and shall submit a written report containing the findings and recommendations to the Executive Director & Head-P&A as soon as practically possible and in any case, not later than **90 days** from the date of receipt of the complaint. The Executive Director & Head-P&A will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

Corrective action may include any of the following:

- a. Formal apology
- b. Counselling
- c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
- d. Change of work assignment / transfer for either the perpetrator or the victim.

e. Suspension or termination of services of the employee found guilty of the offence.

6. 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)*

#### 9. ESSENTIAL REQUIREMENTS OF A COMPLAINT:

- a. Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee.
- b. Where the aggrieved woman is unable to make a complaint on account of her physical/mental incapacity, a complaint may be filed by her relative, friend, co-worker or any person who has knowledge of the incident with the consent from aggrieved woman and/or jointly with her relative or friend.
- c. A complaint must specify the details of the incident in clear language with full particulars.
- d. Date, time and place of Incident must be clearly and unambiguously mentioned in the complaint.
- e. The complaint must disclose the acts committed by the Respondent in clear and unambiguous terms.
- f. If any specific words have been used or any gesture demonstrated by the Respondent that must be explained in detail.
- g. The complaint must disclose in whose presence the misconduct has been committed by the Respondent so that those persons could be called as witnesses to verify the alleged incident.



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- h. The complaint, if possible, should also mention about the material evidence that could substantiate the allegations to enable the Internal Committee to investigate into the same in an effective and efficient manner and reach to a just conclusion.

**10. RESPONSIBILITIES OF THE MANAGEMENT:**

The management shall treat sexual harassment as a gross and unacceptable misconduct under the disciplinary policy and act for such misconduct. The management shall undertake necessary awareness program and preventive measures against sexual harassment of women at workplace. These would include:

- Display at any conspicuous place in the workplace a copy of this policy
- Organize periodical workshops and awareness programs at regular intervals for sensitizing the employees as required under the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and any other relevant awareness and training programs for women employees.
- Organize regular specialized orientation programs for the members of the Internal Committee for dealing with the cases of sexual harassment.
- Provide necessary assistance and facilities to the Internal Committee to deal with the complaint and for conducting inquiry.
- Make available such information to the Internal Committee as may be required having regard to the complaint received.
- Provide support to the Complainant if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.

**11. RESPONSIBILITIES OF THE EMPLOYEES:**

- a. All employees of the Company have a personal responsibility to ensure that they have read the policy document and adhere to the same.

Page 11

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- b. All employees shall strictly follow the obligations of confidentiality as required in this policy.

**12. ACTION FOR MALICIOUS COMPLAINT OR FALSE EVIDENCE:**

- a. Internal Complaint Committee, based on its investigation and findings arrived at the conclusion that the allegation against respondent is malicious or made the complaint knowing it to be false or has produced any forged or misleading document or witnesses, it shall recommend to the employer to take any action against the complainant as per the NIPL' service rules.
- b. Failure to provide sufficient information or evidence shall not be considered as a malicious complaint.
- c. The Internal Complaint Committee shall ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- d. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

**13. CONFIDENTIALITY:**

The Company 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.

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.

Page 12

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**14. 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.

**15. MODIFICATION AND REVIEW OF THE POLICY:**

The Company reserves the right to modify and, or review the provisions of this Policy, to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this

Policy to the extent deemed necessary by the Company from time to time. Any such changes or modifications shall be notified by the Company to its employees in due course.

**16. DISSEMINATION OF THE POLICY:**

The policy shall be hosted on the website of the Company i.e. <https://www.namaninstore.com/investor>.

**Effective Date:** 04<sup>th</sup> June, 2025**Date of Approval by the Board of Directors:** 04<sup>th</sup> June, 2025

### ANNEXURE- A

