

SELZER POLYMERS LIMITED

Policy On Prevention of Sexual Harassment at Work Place

(Adopted on 06.08.2026)



Policy On Prevention of Sexual Harassment at Work Place

1. Introduction and Purpose

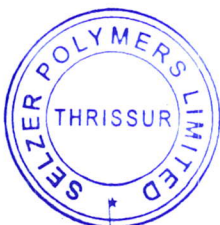
The Company Selzer Polymers Limited is deeply committed to fostering a safe, respectful, inclusive, and dignified work environment for every individual associated with the organization. Sexual harassment in any form is a serious violation of human dignity, personal integrity, and fundamental rights guaranteed under the Constitution of India — particularly Articles 14 (equality before law), 15 (prohibition of discrimination), 19(1)(g) (right to practice any profession or carry on any occupation), and 21 (right to life and personal liberty with dignity).

The Company fully recognises that sexual harassment creates an intimidating, hostile, or offensive work atmosphere, adversely affects employee morale, mental and physical well-being, productivity, creativity, and overall organisational performance. It also exposes the organisation to significant legal, financial, and reputational risks.

This Policy on Prevention of Sexual Harassment at the Workplace (commonly referred to as the POSH Policy) has been formulated in strict compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013. While the statute primarily focuses on protection of women, this Company has consciously adopted a gender-neutral approach so that every employee — irrespective of gender identity, sexual orientation, age, or employment status — receives equal protection from sexual harassment and related misconduct.

2. The core objectives of this policy are:

- (a) To prevent any form of sexual harassment from occurring in the first place
- (b) To provide a fair, time-bound, confidential, sensitive, and impartial mechanism for receiving, inquiring into, and resolving complaints
- (c) To ensure prompt corrective and disciplinary action against proven offenders
- (d) To protect complainants and witnesses from retaliation
- (e) To continuously promote awareness, gender sensitivity, respectful behaviour, and a culture of mutual respect and zero tolerance towards harassment



3. Scope and Applicability

- (a) This policy applies to all categories of employees of the Company, including permanent employees, temporary employees, trainees and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace. The Company will not tolerate sexual harassment, if engaged in, by any employee or co-worker of the Company, its clients or by suppliers or any other business associates.
- (b) The workplace includes:
 - i. offices, establishments or other premises where the Company's business is conducted.
 - ii. All company-related activities performed at any other site away from the Company's premises.
 - iii. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4. Definition of sexual harassment

- (a) 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 a sexual nature.
- (b) Sexual Harassment at workplace includes:
 - i. unwelcome sexual advances— (verbal, written or physical);
 - ii. A 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 etc;
 - v. verbal abuse or 'joking' that is sex-oriented;
 - vi. 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;
 - vii. any other type of sexually-oriented conduct.



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.

6. Complaint mechanism

An appropriate complaint mechanism in the form of a complaints committee has been created in the Company for time-bound redressal of the complaint made by the victim

7. Internal Complaints Committee (ICC)

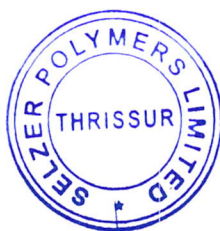
- (a) The Company has constituted a complaints committee for redressal of sexual harassment complaints (made by the victim) and for ensuring time-bound treatment of such complaints. The constitution of ICC has been approved by the Board of Directors in their meeting held on 6th August, 2026. Following are the members of the committee:

Name	Role
Ms. Snehal Tony (CFO)	Presiding Officer
Ms. Veena C Edison	Member
Mr. Subin Sunny	Member
Dr. Janice Shiji (External Member)	Member

- (b) Initially, and till further notice, the complaints committee will comprise the following four members, out of which at least two members will be of the same gender as that of the complainant:

- Presiding Officer: a woman employed at a senior level in the organization or workplace from amongst the employees.
- At least 2 members from amongst employees, committed to the cause of women or having had experience in social work or having legal knowledge.
- One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

At least one half of the total members shall consist of women



(c) The Internal Complaints Committee is responsible for:

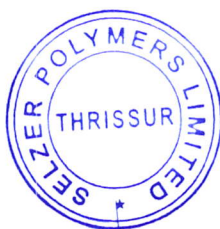
- i. Receiving complaints about sexual harassment at the workplace;
- ii. Investigating every formal written complaint of sexual harassment;
- iii. Co-ordinating with the employer in implementing appropriate action;
- iv. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- v. Discouraging and preventing employment-related sexual harassment.

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

- i. 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.
- ii. 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 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

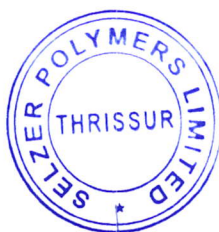
- i. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Company. The complaint shall have to be in writing and can be in the form of a letter, preferably within fifteen (15) days from the date of occurrence of the alleged incident and in case of a series of incidents, within fifteen (15) days from the occurrence of last alleged incident, sent in a sealed envelope, but no later than three months from the date of incident and in case of a series of incidents, no later than three months from the date of last incident (The Complaints Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.). Alternately, the employee can send the complaint through an email. 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.
- ii. The Presiding Officer of the 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 thirty (30) days from receipt of the complaint.
- iii. 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.
- iv. If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.



- v. 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.
- (c) The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board as soon as practically possible and in any case, not later than ninety (90) days from the date of receipt of the complaint. The Executive Director will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.
- (d) Corrective action may include any of the following:
- Formal apology.
 - Counselling.
 - Conciliation.
 - Written warning to the perpetrator and a copy of it maintained in the employee's file.
 - Change of work assignment/transfer for either the perpetrator or the victim.
 - Suspension or termination of services of the employee found guilty of the offence.
- (e) In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

9. Confidentiality

- (a) 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.
- (b) 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.



10. Access to reports and documents

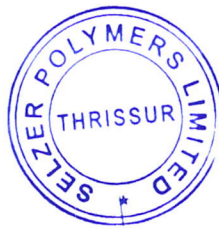
All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

11. Protection to complainant/ victim

- i. The Company 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.
- ii. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- iii. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

12. Conclusion

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



CONFIRMATION REGARDING CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

Date: 07.09.2026

To Whomsoever It May Concern

We, **Selzer Polymers Limited** (the "Company"), hereby confirm that the Company has constituted an **Internal Complaints Committee ("Internal Committee")** pursuant to the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, as amended from time to time (the "POSH Act"), for the prevention, prohibition and redressal of sexual harassment at the workplace.

The Company has constituted a complaints committee for redressal of sexual harassment complaints (made by the victim) and for ensuring time-bound treatment of such complaints. The constitution of ICC has been approved by the Board of Directors in their meeting held on 6th August, 2026. The following are the members of the committee:

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The Internal Complaints Committee is responsible for:

- Receiving complaints about sexual harassment at the workplace;
- Investigating every formal written complaint of sexual harassment;
- Co-ordinating with the employer in implementing appropriate action;
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- Discouraging and preventing employment-related sexual harassment.

The Internal Complaints Committee is responsible for receiving and inquiring into complaints of sexual harassment, taking appropriate action in accordance with the POSH Act, and undertaking measures for the prevention and prohibition of sexual harassment at the workplace.

For and on behalf of
Selzer Polymers Limited



Name: TONY PELLISSERY LONAPPAN
Designation: MANAGING DIRECTOR
Date: 07.09.2026
Place: THRISSUR

