



NEXION SURFACES PRIVATE LIMITED

POSH POLICY

Policy on Prevention, Prohibition and Redressal of Sexual Harassment at Workplace (POSH).

1. Preamble

Nexion is committed to providing a safe, inclusive, respectful, and dignified work environment for all employees, free from sexual harassment. Sexual harassment violates the fundamental rights to equality, life, dignity, and the right to pursue one's profession.

This Policy is framed in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the Rules framed thereunder, and reflects Nexion's zero-tolerance approach towards sexual harassment.

2. Objective

The objectives of this Policy are to:

- Prevent the occurrence of sexual harassment at the workplace;
- Prohibit all forms of sexual harassment;
- Provide a robust, confidential, and time-bound redressal mechanism;
- Promote awareness and sensitization among employees;
- Ensure compliance with applicable laws.

3. Scope and Applicability

This Policy applies to:

- All women employees of Nexion, whether employed on permanent, temporary, contractual, trainee, probationary, consultant, or daily wage basis;
- Women who are not employees but are present at the workplace (vendors, customers, visitors, interns, apprentices, etc.);
- All workplaces of Nexion, including factories, offices, sites, branches, warehouses, and any place visited by the employee arising out of or during the course of employment, including official travel, offsite meetings, and electronic/virtual platforms.

4. Definition of Sexual Harassment

As per the Act, Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- Physical contact and advances;
- A demand or request for sexual favours;
- Sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature, including messages through calls, emails, or social media.

Nexion Surfaces Private Limited

Registered Office: Office No.1104 and 1105, Shapath V, S. G. Highway Ahmedabad - 380015

CIN: U26990GJ2022PTC130486 | **Phone:** +91 63 57 880 637

Email: cs@nexiontiles.com | **Web:** www.nexiontiles.com



5. Internal Complaints Committee (ICC)

In compliance with Section 4 of the Act, Nexion has constituted an Internal Complaints Committee (ICC).

Composition of ICC:

- Presiding Officer – a senior woman employee;
- At least two employee members with experience in social work or legal knowledge;
- One external member from an NGO or association committed to the cause of women;
- At least 50% of the ICC members shall be women.

Complaints against Senior Management / Board Members: In case a complaint is made against senior leadership or Board members, the Chairman/Board reserves the right to constitute a special ICC with appropriate senior and independent members to ensure fairness and impartiality.

Details of ICC members and contact information shall be displayed prominently at all Nexion locations and on official communication channels.

6. Complaint Redressal Process

6.1 Filing of Complaint Version:

- A written complaint should be made within three (3) months from the date of the incident.
- In case of a series of incidents, the complaint should be made within three months from the date of the last incident.
- The ICC may extend the time limit by a further three months for valid reasons.
- Where the aggrieved woman is unable to file a complaint, her legal heir or authorized person may do so.

6.2 Confidentiality

- The identity of the aggrieved woman, respondent, witnesses, proceedings, and recommendations shall be kept strictly confidential.

6.3 Conciliation

- At the written request of the aggrieved woman, the ICC may attempt conciliation before initiating an inquiry.
- Monetary settlement shall not be the basis of conciliation.
- If conciliation terms are not complied with, the ICC shall proceed with an inquiry.

6.4 Inquiry

- The respondent shall submit a written reply within 10 days of receiving the complaint.
- The ICC shall conduct the inquiry in accordance with the principles of natural justice.
- No legal practitioner shall be allowed to represent either party.
- The inquiry shall be completed within 90 days.

6.5 Interim Relief

- During the pendency of inquiry, the ICC may recommend:
- Transfer of the aggrieved woman or respondent;
- Grant of leave up to three months to the aggrieved woman (in addition to existing leave);
- Any other relief deemed appropriate.

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7. Inquiry Findings and Action

If the allegation is not proved, the ICC shall recommend that no action is required.

If the allegation is proved, the ICC may recommend: Disciplinary action as per Nexion service rules;

Deduction from salary of the respondent as compensation to the aggrieved woman.

The Company shall act on the ICC's recommendations within 60 days.

8. False or Malicious Complaints

If the ICC concludes that the complaint was malicious or false, or that forged or misleading evidence was produced, it may recommend action against the complainant or witness as per service rules. Mere inability to substantiate a complaint does not amount to a false complaint.

9. Appeal

Any person aggrieved by the recommendations of the ICC may prefer an appeal in accordance with Section 18 of the Act within 90 days.

10. Awareness and Training

Nexion Group shall:

- Conduct periodic POSH awareness and sensitization programs;
- Ensure mandatory training for ICC members;
- Display the consequences of sexual harassment and ICC details at workplaces.

11. Reporting Channel

Employees may also raise concerns through the "We Care for You" mechanism at wecare@nexiontiles.com ensuring confidentiality and protection against victimization.

12. Responsibility of Employees

All employees are expected to:

- Uphold dignity and respect at the workplace;
- Refrain from engaging in any act of sexual harassment;
- Cooperate during investigations and maintain confidentiality.

13. Policy Review

This Policy shall be reviewed periodically and amended as required to ensure continued compliance with law and best practices.

For clarification, please contact:-

Internal Complaints Committee of Nexion companies formed pursuant under section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013



Annexure A – Location-wise ICC members (Morbi, Ahmedabad, Plants, HO, etc.)

Nexion: HO, Morbi & other Locations:

| Name | Designation | Email ID & Phone Number | Location |
|----------------------------|--|-------------------------|-----------|
| Ms. Sneha Sukhadia | Presiding Officer | | Ahmedabad |
| Ms. Rashmi Umradiya | Secretary to the committee | | Ahmedabad |
| Ms. Shweta Audichya | Employee representative with experience in social work or have legal knowledge | | Mumbai |
| Ms. Harsha Vagadiya | | | Morbi |
| Mr. Srinivasa Rao Paritala | | | Morbi |
| Mr. Dalip Dudani | | | Ahmedabad |
| Mr. Mahesh Delvadia | | | Ahmedabad |

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