

LA OPALA RG LIMITED

Policy for Prevention, Prohibition and Redressal of Sexual Harassment of Women at Workplace (POSH Policy)

Applicable to Head Office, Manufacturing Units, and All Other Establishments

POLICY STATEMENT

La Opala RG Ltd., (The Company) is fully committed to providing a safe, respectful and dignified working environment across all its workplaces. This includes the Head Office (HO), manufacturing units, warehouses, depots, and any other place where work-related activities are performed.

The Company maintains a **zero-tolerance approach** towards any form of sexual harassment and ensures prevention, prohibition, and redressal of such incidents in line with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**.

The objective of this policy is to ensure that all employees, irrespective of location or designation, can work in an environment free from harassment, fear, or intimidation.

The Company is committed to:

- Ensuring a safe workplace across HO, plants, and field locations
- Preventing sexual harassment through awareness and training
- Providing a fair and transparent complaint mechanism
- Ensuring confidentiality and protection from retaliation
- Taking strict disciplinary action where misconduct is proven

SCOPE AND APPLICABILITY

This policy applies uniformly across all establishments of the Company, including but not limited to:

- Head Office (administrative, finance, HR, sales, procurement, etc.)
- Manufacturing units (production, maintenance, quality, packing, dispatch, decal plant etc.)
- Warehouses, logistics centers, and depots
- Company events, training programs, and business travel

It also applies to all categories of personnel, including:

- Permanent employees
- Temporary and contractual workers
- Trainees, apprentices, interns
- Consultants, Retainers and vendors working within Company premises
- Visitors and third parties interacting in a work-related context

DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes any unwelcome conduct of a sexual nature that affects dignity, safety, or creates a hostile work environment.

It includes, but is not limited to:

- Physical contact or unwanted advances
- Requests for sexual favours
- Sexually coloured remarks, jokes, or comments
- Display or circulation of offensive content (images, messages, videos)
- Repeated unwelcome attention or communication
- Any behavior that creates an intimidating or hostile work environment

INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company shall constitute an Internal Complaints Committee (ICC) at the corporate level and/or at unit level as required by law, to ensure accessibility and effective redressal across all locations.

ICC composition includes:

- A senior woman employee as Presiding Officer
- At least two employee members with integrity and relevant experience.
- One external member from an NGO or expert in women's issues

ICC responsibilities:

- Receiving and registering complaints from any location (HO or units)
- Conducting fair and impartial inquiries
- Ensuring confidentiality and timely resolution
- Recommending appropriate disciplinary action

At least one-half of the total members of the IC shall be women.

A list of members, as on the date of revision of this Policy, along with their contact details is annexed herewith at **Annexure 'A'**. Any updates to the said index would be appropriately circulated and made known to all La Opala employees through notice from time to time.

COMPLAINT MECHANISM

Any employee working at any location (HO, plant, or field) may file a complaint with the ICC through written submission or official communication channels.

Key provisions:

- Complaints should ideally be filed within 3 months of the incident (extendable in justified cases)
- Assistance will be provided if the complainant requires help in documenting the complaint
- All complaints will be treated confidentially
- No employee shall face retaliation for raising a complaint or participating in proceedings

INQUIRY PROCEDURE

The ICC will conduct a fair, neutral, and time-bound inquiry process applicable across all units and locations.

The process includes:

- Initial review and acknowledgment of complaint
- Recording of statements from both parties
- Examination of evidence and witnesses
- Application of principles of natural justice
- Submission of inquiry report with findings and recommendations

DISCIPLINARY ACTION

If allegations are proven, appropriate disciplinary action will be taken irrespective of location or designation.

Possible actions include:

- Written warning or counselling
- Suspension from duty
- Salary or benefit penalties as per rules
- Termination of employment
- Legal action under applicable laws

PROTECTION AGAINST RETALIATION

The Company strictly prohibits retaliation in any form against complainants, witnesses, or ICC members across all locations.

Retaliation includes:

- Threats or intimidation
- Adverse work assignments
- Harassment or victimization
- Any form of discrimination following complaint filing

Such actions will be treated as serious misconduct.

AWARENESS AND TRAINING

The Company ensures continuous awareness across HO and all manufacturing units.

Training initiatives include:

- POSH awareness sessions for all employees (including factory floor workers)
- Induction training for new employees at all locations
- Training for supervisors, managers, and ICC members

CONFIDENTIALITY

All POSH-related matters are strictly confidential across the organization.

Confidential information includes:

- Identity of complainant/respondent
- Details of complaint and inquiry proceedings
- ICC deliberations and reports
- Final decisions and recommendations

COMPLIANCE AND REVIEW

The Company ensures full compliance with statutory requirements and regularly reviews implementation across HO and all units.

Compliance includes:

- Annual POSH report submission as per law
- Periodic review of ICC functioning across locations
- Updating policy as per legal amendments
- Maintaining proper documentation and records

The Company reaffirms its unwavering commitment to maintaining a workplace that is safe, respectful, and free from any form of sexual harassment across all locations, including the Head Office, manufacturing units, and other establishments.

This Policy is intended not only as a compliance requirement under the law but also as a reflection of the Company's core values of dignity, equality, and mutual respect at work. Every employee is expected to contribute to a culture where inappropriate conduct is neither tolerated nor ignored.

All employees, supervisors, and management personnel are equally responsible for ensuring the effective implementation of this Policy. Awareness, sensitivity, and timely reporting are essential to its success.

The Company assures that every complaint will be dealt with in a fair, impartial, and confidential manner, with complete protection against retaliation. Disciplinary action, where required, will be decisive and in accordance with applicable law.

By working together, the Company and its employees commit to fostering a workplace where everyone can work with confidence, dignity, and respect.

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.

ANNEXURE 'A'

INDEX OF MEMBERS OF THE INTERNAL COMPLAINTS COMMITTEE

As on 12.08.2026 [the date of revision of this Policy]

LA OPALA RG LIMITED (HEAD OFFICE)			
S. NO.	NAME OF MEMBER	DESIGNATION	EMAIL ID'S
1	Mrs. Nidhi Jhunjhunwala	Presiding Officer	nidhi@laopala.in
2	Mr. Jit Roy Choudhury	Committee Member	jit.roychoudhury@laopala.in
3	Mrs. Resham Chandak	Committee Member	resham@laopala.in
4	Mrs. Triparna Bhattacharya	Committee Member	triparna@laopala.in
5	Mrs. Amita Dutt	External Member	amitadutt@gmail.com

LA OPALA RG LIMITED (SITARGANJ UNIT)			
S. NO.	NAME OF MEMBER	DESIGNATION	EMAIL ID'S
1	Ms. Kalawati Bora	Presiding Officer	kalawat664@gmail.com
2	Mr. Durgesh Mohan	Committee Member	durgesh@laopala.in
3	Mr. Ritnesh Singh Chauhan	Committee Member	ritnesh.singh.chauhan@laopala.in
4	Ms. Pooja Bora	Committee Member	poojabora1982@gmail.com
5	Ms. Pooja Fulara	Committee Member	poojaunit1@gmail.com
6	Ms. Jaya Joshi	External Member	jayajoshi7862021@gmail.com
