

Chromewell Engineering Private Limited

Anti-Discrimination, Harassment & Abuse Policy

POLICY NO: CW-HR-006 | VERSION: 4.0 (JAN 2026)

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1. Document Information:

Document Details		Governance
Policy Owner: HR HOD	Scope: All employees, contractors, visitors, and third parties interacting with Chromewell Engineering personnel. Covers all employment decisions and all aspects of the working environment at all sites.	Reviewed & Approved By: CEO & CFO
Secondary Owner: Compliance Executive	Applies To: All forms of employment, all sites, all interactions including remote, on-site, and work-related events and communications. Applies to all protected characteristics listed in Section 3.	Review Cycle: Annual – Once a year

2. Purpose

Chromewell Engineering Pvt Ltd is committed to providing a workplace free from discrimination, harassment, victimisation, and abuse in all forms. Every employee has the right to work in an environment where they are treated with dignity and respect, where their individual contribution is valued, and where all employment decisions are based solely on merit, competence, and performance.

Diversity, equity, and inclusion are both ethical obligations and business imperatives. A diverse workforce improves problem-solving, innovation, and organisational resilience. Addressing pay equity and ensuring equal opportunity across gender, age, disability, and ethnicity remains always a topmost priority for Chromewell.

This policy is aligned with:

- ILO Convention C100 - Equal Remuneration and C111 - Discrimination (Employment and Occupation)
- Indian Prevention of Sexual Harassment at the Workplace Act 2013 (POSH Act)
- Indian Constitution - Articles 14, 15, and 16 (equality and non-discrimination)
- GRI 405: Diversity and Equal Opportunity (2016) and GRI 406: Non-discrimination (2016)
- CSRD ESRS S1 - Own Workforce (diversity, pay equity, equal opportunity)
- SA8000 Social Accountability Standard - Sections 5 and 7

3. Scope

This policy covers all aspects of the employment relationship where discrimination or harassment may occur, including:

- Recruitment, selection, and onboarding
- Remuneration, benefits, and performance appraisal
- Promotion, transfer, and career development opportunities
- Termination, redundancy, and retirement
- Working conditions, day-to-day interactions, and the general workplace environment
- Work-related events, business travel, and digital and electronic communications

Protected characteristics covered by this policy include:

- Gender, gender identity, and gender expression
- Age - any age group, including young workers and those approaching retirement
- Race, ethnicity, caste, national origin, or colour
- Religion or belief
- Disability - physical or mental
- Marital or family status, including pregnancy and maternity
- Sexual orientation
- Trade union membership or representative status.

4. Key Objectives and Targets

Chromewell Engineering defined both Key objectives and targets for Anti-Discrimination, Harassment & Abuse related issues from its own operations and from its supply chain.

Anti-Discrimination, Harassment & Abuse Issue	Key Objectives	Targets
Non-Discriminatory Recruitment	Ensure all hiring decisions are based on objective, role-relevant criteria. Eliminate discriminatory language from all job postings. Build a more diverse workforce at all levels.	100% of job postings reviewed by HR for discriminatory language before publication Workforce gender balance by seniority level: reported annually All shortlisting decisions documented with objective, auditable rationale
Pay Equity	Ensure employees performing equal work of equal value receive equal pay, regardless of gender or any other protected characteristic.	Gender pay gap: measured annually, 2.5% year-on-year reduction target 100% of roles have documented pay bands with objective criteria Pay equity audit: completed annually by April
Anti-Bias Training	Ensure all managers involved in recruitment, appraisal, and promotion decisions complete regular training to identify and counteract unconscious bias.	100% of managers complete anti-bias training annually 100% of HR personnel complete POSH Act compliance training annually
Harassment Prevention & Zero Tolerance	Maintain a workplace culture of zero tolerance for sexual harassment, bullying, victimisation, and abuse. All employees know their rights and how to report violations safely.	Zero tolerance: all confirmed cases result in proportionate disciplinary action POSH Internal Complaints Committee: active, visible, and communicated to all employees 100% of employees informed of reporting mechanisms during induction Annual workplace respect awareness campaign: conducted each April
Grievance Resolution	Ensure all complaints of discrimination and harassment are investigated promptly, impartially, and with full confidentiality for the complainant.	100% of formal complaints acknowledged within 48 hours 100% of investigations completed within 30 working days Zero confirmed cases of retaliation against any complainant
Diversity, Equity & Inclusion	Build a diverse and inclusive workforce at all levels, with a particular focus on gender inclusion and representation of underrepresented groups in management.	Women in management: ≥ 20% by December 2027 Workforce DEI data published annually in Sustainability Report: reviewed and updated annually

5. Governance and Allocation of Responsibilities

Clear accountability is assigned at every level of Chromewell Engineering's ESG Governance Structure. The table uses a RACI framework (Accountable, Responsible, Consulted, Informed).

Role / Designation	RACI Level	Department	Key Responsibilities Under This Policy
CEO / CFO	Accountable (A)	Executive	Final approval of this policy. Sets a zero-tolerance culture for discrimination and harassment from the top. Receives annual diversity, equity, and grievance performance report.
HR HOD	Primary Owner (R)	Human Resources	Owns all anti-discrimination, harassment, and DEI programme elements. Manages complaint investigations, pay equity analysis, DEI data reporting, and the formal grievance process.
Compliance Executive	Secondary Owner (R)	Compliance	Advises on POSH Act 2013 obligations, Indian equal opportunity legislation, and international anti-discrimination law applicable to EU and US export markets. Legal sign-off on policy changes.
All Line Managers	Responsible (R)	All Functions	Make non-discriminatory decisions in all hiring, promotion, performance, and pay actions within their teams. Complete annual anti-bias training. Support prompt reporting and investigation of any complaints in their team.
Internal Complaints Committee (ICC)	Responsible (R)	Cross-functional	Receives and investigates complaints of sexual harassment under the POSH Act 2013. Operates independently of line management. Composition, contact details, and process are communicated to all employees.
All Employees	Responsible (R)	All Functions	Maintain a respectful workplace. Refrain from any form of discriminatory, harassing, bullying, or abusive behaviour. Report any violations through the grievance mechanism or ICC.

RACI: A = Accountable (signs off, one person only) · R = Responsible (does the work) · C = Consulted (input required) · I = Informed (kept in loop).

6. Policy Commitments

6.1 Non-Discrimination in All Employment Decisions

- All employment decisions - including hiring, promotion, remuneration, training allocation, and termination - are based solely on objective, role-relevant criteria
- All job postings and selection processes use inclusive language and structured assessment criteria, reviewed by HR before publication
- Pay scales are transparent, documented, and applied consistently across all employee groups; a pay equity audit is conducted annually

6.2 Prohibition of Harassment, Bullying, and Abuse

Chromewell Engineering has zero tolerance for:

- Sexual harassment - as defined by the POSH Act 2013 - in any form, including verbal, non-verbal, visual, and physical conduct

- Workplace bullying: persistent, unwanted behaviour that undermines, humiliates, or intimidates an individual
- Physical, psychological, or verbal abuse of any employee, contractor, or visitor
- Victimization: treating an employee detrimentally because they made, supported, or were a witness to a complaint

An Internal Complaints Committee (ICC) is established and maintained in full compliance with the POSH Act 2013. The ICC operates independently of line management. Its composition, contact details, and process are posted in all work areas and communicated to all employees during induction and annually thereafter.

6.3 Anti-Bias Training and Manager Accountability

- All managers with authority over hiring, appraisal, or promotion complete annual anti-bias training
- All HR personnel complete annual POSH Act compliance training
- Manager performance appraisals include an assessment of inclusive and respectful management behaviour

6.4 Grievance Process and Investigation

- Any employee who experiences or witnesses’ discrimination, harassment, or abuse may raise a formal complaint through the HR grievance mechanism via SharePoint ChromeNet or directly to the ICC (for sexual harassment under the POSH Act)
- All complaints are acknowledged within 48 hours and investigated impartially within 30 working days
- The complainant’s identity is protected throughout the process to the maximum extent practicable
- Confirmed violations result in proportionate disciplinary action up to and including termination of employment
- Complainants and witnesses are protected from any form of retaliation
- “Report a concern” form available on ChromeNet as an anonymous grievance redressal mechanism and, we have a dedicated hotline number published on the website to report any concern anonymously.

6.5 Diversity, Equity, and Inclusion Programme

- Chromewell publishes annual workforce diversity data including gender and age group distribution in the Sustainability Report
- A Diversity, Equity, and Inclusion action plan is reviewed and updated annually with specific, measurable targets for representation in management
- Employee resource groups or affinity networks for underrepresented groups are supported where employee interest exists

7. KPI Monitoring and Reporting

The following KPIs are tracked by the ESG Working Group, reported quarterly to the ESG Steering Committee, and published annually in the Chromewell Sustainability Report.

KPI / Indicator	Target	Measurement Method	Cadence	Owner
Formal Discrimination / Harassment Complaints Received	Tracked; zero target for upheld complaints	HR and ICC grievance register	Quarterly	HR HOD

Complaint Acknowledgement Within 48 Hours	100%	HR records	Quarterly	HR HOD
Investigation Completion Within 30 Working Days	100%	HR investigation log	Quarterly	HR HOD
Zero Confirmed Cases of Retaliation Against Complainants	Zero	HR records	Quarterly	HR HOD
Gender Pay Gap	Measured; 2.5% YoY reduction	HR payroll analysis	Annual	HR HOD
Women in Management	≥ 20% by December 2027	HR workforce data	Annual	HR HOD
Manager Anti-Bias Training Completion	100% annually	Training register	Annual	HR HOD
POSH ICC Active, Visible, and Communicated	Maintained at all times	HR compliance records	Annual	Head of Compliance
DEI Data Published in Sustainability Report	Annual	ESG reporting cycle	Annual	Compliance Executive

8. Policy Review Mechanism

This policy is reviewed annually every April by the Head of HR with formal approval by the CEO/CFO. Interim review is triggered by:

- any confirmed harassment or discrimination incident, amendments to the POSH Act or Indian equality legislation,
- findings from internal or external audits or
- significant adverse DEI data trends.

Version	Date	Author	Approved By	Summary of Changes
1.0	July 01, 2021	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Initial issue
2.0	May 03, 2022	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Minor edits on the Quantitative targets
3.0	June 05, 2025	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Updated to v3.0: KPI has been revised
4.0	Jan 14, 2026	HR HOD / CFO	Mr. Amardeep Mardhekar (CEO) Ms. Risha Naik (CFO)	Added related policies with clear accountability and ownership

9. Compliance, Non-Conformance, and Disciplinary Action

- Any form of discrimination, harassment, bullying, or victimisation constitutes serious misconduct and will result in disciplinary action proportionate to the severity of the violation
- Managers who fail to act on reported complaints, or who themselves engage in prohibited conduct, are subject to enhanced disciplinary action including termination

- Retaliation against any person who makes a complaint in good faith is itself an independent ground for disciplinary action

10. Related Documents and References

Internal policies:

- CW-WC-002 - Fair Working Conditions & Labour Standards Policy (remuneration, benefits, and working conditions)
- CW-HR-007 - Learning, Development & Competency Policy (training, appraisal, and promotion processes)
- CW-CL-008 - Child Labour, Forced Labour & Human Trafficking Policy
- CW-HSW-001 - Employee Health, Safety & Wellbeing Policy (psychological safety)
- CW-ETH-004 - Whistleblower Protection & Speak-Up Policy

External standards:

- ILO Convention C100 - Equal Remuneration
- ILO Convention C111 - Discrimination (Employment and Occupation)
- Indian Prevention of Sexual Harassment at Workplace Act 2013 (POSH Act)
- Indian Constitution - Articles 14, 15, and 16
- GRI 405: Diversity and Equal Opportunity (2016) and GRI 406: Non-discrimination (2016)
- CSRD ESRS S1 - Own Workforce
- SA8000 Social Accountability Standard - Sections 5 and 7

11. Formal Approval and Sign-Off

This policy has been prepared, reviewed, and formally approved:

Prepared By	Reviewed By	Approved By
Name: Mr. Sandeep Divekar Designation: HR HOD Date: Jan 2026 Signature: 	Name: Ms. Risha Naik Designation: CFO Date: Jan 2026 Signature: 	Name: Mr. Amardeep Mardhekar Designation: CEO Date: Jan 2026 Signature: 

FOR FURTHER INFORMATION:

This policy is issued under the authority of the CEO & CFO of Chromewell Engineering Pvt Ltd. It supersedes v3.0 (June 2025). For further information or advice, please contact a Chromewell Finance or Compliance Officer or Chromewell's Board or Directors.