

**POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE
Of
VIRAJ PROFILES PRIVATE LIMITED
Under The Sexual Harassment of Women at Workplace (Prevention, Prohibition
and Redressal) Act, 2013
(effective from 1st August, 2025)**

This policy is in supersession of previous policy and consistence with applicable laws.

I. COMMITMENT:

Our Company 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.

II. SCOPE:

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites in India or abroad. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes in India or Abroad:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

III. DEFINITIONS:

a) Aggrieved woman:

(i) 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;

(ii) in relation to dwelling place or house, a woman of any age who is employed in such a dwelling place or house;

b) Complainant: Any aggrieved woman who makes a complaint alleging sexual harassment under this policy.

c) Respondent: A person against whom the aggrieved party has made the complaint.

- d) **Employee:** A person employed at a workplace for any work on regular, temporary, ad hoc 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- e) **Company:** Any person responsible for the management, supervision and control of the workplace and the person discharging contractual obligations with respect to his/her employees.
- f) **District Officer:** Officer designated by the Government to exercise power or discharge functions under the Sexual Harassment of Women at Workplace Act 2013.
- g) **Workplace:** In addition to the place of work, it extends to any place visited by the employee arising out of or during the course of employment and includes transportation provided by the employer for undertaking such journey.
- h) **Sexual Harassment:** The following behavior is considered inappropriate within the Company's working environment and is liable for disciplinary action and legal action if necessary.
- Unwelcome sexual advances involving verbal, non-verbal or physical conduct, implicit or explicit;
 - Physical contact and advances;
 - Demand or request for sexual favors;
 - Making Sexually colored remarks, including but not limited to vulgar/ indecent jokes, letters, phone calls, text messages, e-mails, gestures, etc.;
 - Showing pornography or the likes;
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
 - Physical contact and advances such as touching, stalking, sounds which have explicit and/or implicit sexual connotation/ overtones, molestation, etc.;
 - Display of pictures, signs, etc. with sexual nature/ connotation/overtones in the work area and work related areas;
 - Verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature;
 - Teasing, innuendos and taunts, physical confinement and/or touching against one's will and likely to intrude upon one's privacy.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:

- i) Implied or explicit promise of preferential treatment in the employment.
- ii) Implied or explicit threat or detrimental treatment in the employment.
- iii) Implied or explicit threat about the present or future employment status.
- iv) Interference with the work or creating an intimidating or offensive or hostile work environment.
- v) Humiliating treatment likely to affect health or safety.

An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.

- j) **The Act:** The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

IV. REDRESSAL MECHANISM:

In compliance with the Act, any complaint under this policy shall be followed by a formal redressal mechanism as described in this Policy.

a. Internal Complaints Committee (Henceforth known as "Committee")

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the Company. The detail of the Committee is notified to all covered persons at the location (workplace). The Committee at each location comprises of:

1. **Presiding Officer:** A woman employed at a senior level in the organization or workplace
2. At least 2 members from amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge
3. One external 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
4. At least one half of the total members nominated being women.

The Composition of Committee shall be as approved by the Board of Directors from time to time and tenure of Presiding officer and other members will be three (3) years

or until the Board of Directors reconstitutes the Internal Complaints Committees (IC), whichever is later.

The Committee will be responsible for:

1. Receiving complaints of sexual harassment at the workplace
2. Initiating and conducting inquiry as per the established procedure
3. Submitting findings and recommendations of inquiries
4. Coordinating with the employer in implementing appropriate action
5. Maintaining strict confidentiality throughout the process as per established guidelines
6. Submitting annual reports in the prescribed format

b. Lodging a Complaint

An aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee within a period of 3 months from the date of incident/ last incident. The Internal Committee can extend the timeline by another 3 months for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint within the period.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.

1. If the Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:
 - a. her relative or friend; or
 - b. her co-worker; or
 - c. an officer of the National Commission for Women or State Women's Commission; or
 - d. any person who has knowledge of the incident, with the written consent of the Aggrieved Woman
2. If the Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:
 - a. her relative or friend; or
 - b. a special educator; or
 - c. a qualified psychiatrist or psychologist; or
 - d. the guardian or authority under whose care she is receiving treatment or care; or
 - e. any person who has knowledge of the incident jointly with the Aggrieved Woman's

relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care

3. If the Aggrieved Woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.
4. If the Aggrieved Woman is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.

The complaint shall be submitted by the complainant to the IC in writing or can be dropped at the drop box provided at the offices or shall be submitted to the IC electronically at Posh@viraj.com. The complaint can also be physically submitted to any IC member.

c. Receiving a Complaint (guidelines)

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed, and it requires tact and discretion while receiving the complaint.

The following points are to be kept in mind by the receiver of the complaint:

- Complaints are listened to, and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate Committee and follow up will be done speedily.
- Situations are not pre-judged. Written notes are to be taken while listening to the person. When taking notes, complainants' own words, where possible, are to be used accurately. Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
- All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.
- The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity

Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.

d. Resolution procedure through conciliation

Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman.

No monetary settlement can be made as a basis of conciliation.

In case a settlement is arrived at, the Committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation is to happen within 2 weeks of receipt of complaint.

The Committee shall provide copies of the settlement to complainant & respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the Committee.

e. Resolution procedure through formal inquiry

The Committee will initiate inquiry in the following cases:

- No conciliation is requested by Aggrieved Woman
 - Conciliation has not resulted in any settlement
 - Complainant informs the Committee that any term or condition of the settlement arrived through conciliation, has not been complied with by respondent
- a. Manner and Procedure of inquiry into complaint:
- Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
 - The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case.
 - At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
 - The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
 - Upon receipt of the complaint, the Committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
 - Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
 - Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an

inquiry shall be conducted and concluded.

- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
 - If the Complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
 - The Committee shall call upon all witnesses mentioned by both the parties.
 - The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
 - If either party desires to tender any documents by way of evidence before the Committee, the same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
 - No legal practitioner can represent any party at any stage of the inquiry procedure
 - The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice
 - In conducting the inquiry, a minimum of three Committee members including the Presiding Officer are to be present
 - The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy
 - Where sexual harassment occurs because of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
-
- In the event, the complaint does not fall under the purview of Sexual Harassment, or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements. In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure should ensure absolute fairness to all parties.

b. Interim relief

During pendency of the inquiry, on a written request made by the complainant, the Committee may recommend to the employer to:

- Transfer the complainant or the respondent to any other workplace
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled
- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the same is informed to the Committee.

c. Termination of Inquiry

Committee may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 days' written notice is to be given to the party, before termination of enquiry or ex-parte order.

d. Action to be taken after inquiry

Post the inquiry, the Committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

e. Complaint unsubstantiated

Where the Committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the Committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded, and neither will be disadvantaged within the Company.

f. Complaint substantiated

Where the Committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- i. Counseling
- ii. Censure or reprimand
- iii. Apology to be tendered by respondent
- iv. Written warning
- v. Withholding promotion and/or increments
- vi. Suspension
- vii. Termination
- viii. Or any other action that the employer may deem fit.

The Company is required to act upon the recommendations within 60 days and confirm to the Committee. Post implementation of the actions, follow up with the complainant should also occur to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring.

g. Penal Consequences of Sexual Harassment

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC) [the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant] / Bharatiya Nyaya Sanhita (BNS), 2023 [Section 75 of BNS 2023 deals with the offense of sexual harassment. Offences under Section 75 are cognizable offence (police can arrest without a warrant) and generally non-bailable, reflecting the seriousness of the crime.]

h. Malicious Allegations

Where the Committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint.

While deciding malicious intent, the Committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

i. Confidentiality

The identity of the complainant, respondent, witnesses, all statements, and any other evidence obtained during the inquiry process, including the recommendations of the Committees and any action taken by the employer, shall be deemed strictly confidential. This information must not be disclosed, discussed, or shared with any person whatsoever, including but not limited to supervisors, colleagues, friends, family members, or any third parties, whether inside or outside the organization.

Any form of disclosure, whether verbal, written, electronic, or otherwise, of confidential information related to the inquiry process is strictly prohibited.

Violation of this confidentiality obligation shall be considered a serious breach of conduct and will result in immediate disciplinary action, up to and including termination of employment, as prescribed under the relevant act and company policies.

The company reserves the right to take legal action against any individual who unlawfully discloses confidential information obtained during the inquiry process.”

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

j. Appeal

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with the Act, within 90 days of the recommendations being communicated.

k. Awareness

Awareness sessions are to be organized to:

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- Carry out orientation programs and seminars for the Members of the IC.
- Conduct capacity building and skill building programs for the Members of the IC.

- Declare the names and contact details of all the Members of the IC.
- Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.

I. Legal Compliance

The IC shall in each calendar year prepare, in such format as may be prescribed, an annual report and submit the same to the employer and the District Officer (as defined in the Act). The report shall have the following details:

- number of complaints of Sexual harassment received in the year
- number of complaints disposed of during the year
- number of cases pending for more than 90 days
- number of workshops or awareness program against Sexual Harassment carried out, nature of action taken by the employer or District Officer

This Policy was approved by the Board of Directors at its meeting held on 30th July, 2025.

Duties of Employer

Every employer shall—

- (a) provide a safe working environment at the workplace with shall include safety from the persons coming into contact at the workplace;
- (b) display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee;
- (c) organise workshops and awareness program at regular intervals for sensitising the employees with the provisions of the Act and orientation program for the members of the Internal Committee in the manner as may be prescribed;
- (d) provide necessary facilities to the Internal Committee, as the case may be, for dealing with the complaint and conducting an inquiry;
- (e) assist in securing the attendance of respondent and witnesses before the Internal Committee, as the case may be;
- (f) make available such information to the Internal Committee as the case be, as it may require having regard to the complaint;
- (g) provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) / Bharatiya Nyaya Sanhita (BNS), 2023 or any other law for the time being in force;
- (h) cause to initiate action, under the Indian Penal Code (45 of 1860), Bharatiya Nyaya Sanhita (BNS), 2023 or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;
- (i) treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct;
- (j) monitor the timely submission of reports by the Internal Committee.