



KESAR INDIA LIMITED

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POLICY FOR PREVENTION OF SEXUAL HARRASMENT AT WORPLACE

Approved on: April 7, 2022

❖ PREAMBLE:

KESAR INDIA LIMITED (“the Company”) is committed to providing a safe, inclusive, dignified and respectful working environment to all persons associated with the Company.

The Company maintains a policy of zero tolerance towards sexual harassment at the workplace and is committed to preventing, prohibiting and redressing acts of sexual harassment in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the rules made thereunder, and other applicable laws, regulations and guidelines, including the applicable requirements under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.

The Company believes that every individual has the right to work in an environment free from sexual harassment, intimidation, discrimination, hostility and retaliation.

❖ PURPOSE:

The main purpose of this Policy is to create a safe, respectful work environment where every employee is protected from sexual harassment and to ensure a prompt, fair redressal mechanism.

The objectives of this Policy are to:

- provide a safe, secure and respectful workplace free from sexual harassment;
- prevent and prohibit sexual harassment at the workplace;
- provide a fair, transparent, time-bound and confidential mechanism for dealing with complaints of sexual harassment;
- protect the dignity, rights and interests of persons associated with the Company;
- ensure that complaints are dealt with promptly, impartially and in accordance with applicable law;
- create awareness amongst employees and other persons covered under this Policy regarding prevention of sexual harassment; and
- ensure appropriate remedial and disciplinary action where allegations of sexual harassment are established.

❖ SCOPE:

This Policy shall apply to all persons covered under the applicable provisions of the POSH Act, including permanent, temporary and contractual employees, trainees, apprentices, interns, visitors, consultants, retainers, third-party service providers, and any other person associated

with or visiting the Company or its workplace, whether on Company premises or in any work-related setting.

The Policy shall also apply to conduct occurring at the Company's premises, project sites, or any work-related location, including during official meetings, events, training, business trips, transportation provided by the Company, or any other activity connected with employment. It shall also cover workplace-related conduct through electronic or digital communication, including emails, messaging applications, video conferences, social media, and other electronic platforms.

❖ **DEFINITION OF SEXUAL HARASSMENT:**

- **“Act” or “POSH Act”**

Means the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, as amended from time to time, together with the rules made thereunder.

- **“Aggrieved”**

Means an aggrieved person of any age, whether employed or not, who alleges to have been subjected to sexual harassment at the workplace, in accordance with the POSH Act.

- **“Employee”**

Includes any person employed at the workplace for any work on regular, temporary, ad hoc or daily wage basis, directly or through an agent, including a contractor, with or without the knowledge of the principal employer, and includes persons engaged as trainees, apprentices or otherwise, as applicable under the POSH Act.

- **“Employer”**

Shall have the meaning assigned to it under the POSH Act and shall include the person responsible for the management, supervision and control of the workplace, as applicable.

- **“Internal Committee” or “IC”**

Means the Internal Committee constituted by the Company in accordance with the provisions of the POSH Act and the rules made thereunder.

**The names, contact details and composition of the Internal Committee shall be maintained separately by the Company and shall not form part of this Policy.*

- **“Respondent”**

Means a person against whom a complaint of sexual harassment has been made.

- **“Sexual Harassment”**

Any unwelcome conduct of a sexual nature, whether verbal, non-verbal, physical, or visual, that creates an intimidating, hostile, or offensive work environment whether directly or by implication. This includes, but is not limited to:

- Unwanted sexual advances or propositions
- Lewd remarks, jokes, or innuendos
- Display of pornographic or sexually explicit material
- Inappropriate touching or gestures
- Retaliation for rejecting such conduct

❖ **INTERNAL COMMITTEE**

The Company shall constitute and maintain an **Internal Committee (“IC”)** in accordance with the requirements of the POSH Act and the rules made thereunder.

The Internal Committee shall have such composition, tenure, powers and responsibilities as prescribed under applicable law.

The Internal Committee shall be responsible for receiving and dealing with complaints of sexual harassment, conducting inquiries in accordance with law, making appropriate recommendations and undertaking such other functions as may be prescribed.

The Company shall ensure that the Internal Committee is provided with appropriate support, facilities and assistance necessary for discharging its statutory responsibilities.

Details regarding the constitution, names and contact particulars of the Internal Committee shall be maintained separately by the Company and may be communicated to employees and other covered persons through appropriate internal channels.

❖ **Responsibilities:**

- **Management:**

The Management shall ensure effective implementation of this Policy, maintain zero tolerance towards sexual harassment, provide necessary support and resources, facilitate the constitution and functioning of the Internal Committee, take appropriate action in accordance with law based on its recommendations, and promote a workplace culture founded on dignity, equality, respect and professionalism.

- **HR & POSH Committee:**

HR or such other designated function shall assist in implementing this Policy, facilitate awareness and training programmes, provide administrative support to the Internal Committee, maintain required records, assist in implementing its recommendations, and ensure compliance with confidentiality requirements.

- **Internal Committee:**

The Internal Committee shall receive and address complaints of sexual harassment, assist the complainant where required, conduct inquiries in accordance with the POSH Act and applicable rules, provide a fair opportunity to the concerned parties, maintain confidentiality, submit its findings and recommendations as prescribed by law, and perform such other functions as may be required under the POSH Act.

- **Reporting Officer:**

Any manager, supervisor or reporting officer who receives information regarding an alleged incident of sexual harassment shall promptly refer the matter to the appropriate HR function or Internal Committee and shall not attempt to independently investigate or suppress the complaint.

- **Employees:**

Every employee and covered person shall maintain professional and respectful conduct, refrain from sexual harassment, report incidents through the prescribed mechanism, cooperate with the Internal Committee's inquiry, and maintain confidentiality regarding complaints and proceedings.

❖ **Complaint Mechanism:**

An aggrieved person may make a complaint of sexual harassment to the Internal Committee in the manner prescribed under the POSH Act.

The complaint should be made in writing through email/online form within 30 days from the date of the incident or, in case of a series of incidents, within 30 days from the date of the last incident.

Where the aggrieved person is unable to make the complaint in writing, reasonable assistance shall be provided to her for making the complaint in writing.

The Internal Committee may, in accordance with the POSH Act, extend the time limit for making a complaint by a further period of up to three months, where it is satisfied that circumstances prevented the aggrieved woman from making the complaint within the prescribed period.

Complaints may be submitted through the channels designated by the Company from time to time, including the prescribed email address, online mechanism or other officially notified channel.

The Internal Committee shall acknowledge receipt of the complaint within 2 working days and conduct an impartial inquiry within 30 days. Both parties shall be given a reasonable opportunity to present evidence and witnesses. Based on its findings, appropriate action, including disciplinary action, counselling or termination, as applicable, shall be taken. The complainant shall be informed of the outcome, and either party may appeal within 15 days to the Managing Director, whose decision shall be final, subject to applicable law.

❖ Confidentiality

The Company, Internal Committee and all persons involved shall maintain strict confidentiality regarding the identities of the parties and witnesses, complaint, inquiry proceedings, recommendations and action taken. Such information shall not be disclosed except as permitted or required by law. Any breach of confidentiality shall be dealt with in accordance with the POSH Act and applicable rules.

All information related to a complaint will be kept strictly confidential. Only persons directly involved in the investigation will have access to the details.

❖ FALSE OR MALICIOUS COMPLAINTS

Where the Internal Committee concludes, after due inquiry and in accordance with applicable law, that a complaint was made maliciously or that the complainant knowingly made a false complaint or produced forged or misleading documents, appropriate action may be recommended in accordance with the POSH Act and applicable service rules.

However, **mere inability to substantiate a complaint or provide adequate proof shall not by itself attract action against the complainant.**

Any determination regarding malicious intent or a knowingly false complaint shall be made only after following the procedure prescribed under applicable law.

❖ Protection Against Retaliation

The Company strictly prohibits retaliation, victimisation, intimidation or adverse treatment against any person who makes a complaint in good faith, assists or participates in an inquiry, acts as a witness, or provides information or evidence. Any such act may constitute misconduct and attract appropriate disciplinary action in accordance with applicable law and service rules.

❖ Awareness & Training

The Company shall promote awareness of the prevention of sexual harassment and this Policy through induction, periodic sensitisation and training programmes, including specialised training for Internal Committee members, and communication of the complaint mechanism and zero-tolerance approach. Appropriate records of such programmes shall be maintained as required by law.

All new employees shall undergo POSH induction training within one month of joining the Company. The training shall familiarise employees with the provisions of the POSH Act, this Policy, prohibited conduct, the complaint mechanism, confidentiality requirements, protection against retaliation, and the roles and responsibilities of employees and the Internal Committee. Refresher and sensitisation programmes shall be conducted at least annually for all employees to reinforce awareness, promote a respectful and safe workplace, and ensure continued compliance with applicable law.

❖ Review

This Policy shall be reviewed periodically and may be amended by the Board of Directors or such authority as may be authorised by the Board.

The Policy shall be reviewed whenever there is any change in applicable law, regulations, regulatory requirements or the Company's internal processes.

For Kesar India Limited

**Sd/-
Yash Gopal Gupta
Whole-Time Director**

The Policy was reviewed by the Board of Directors of the Company at its Meeting held on April 18, 2026.
