

**"Sexual Harassment Policy
– Kasliwal Projects Limited"**
(Formerly known as Kasliwal Projects Private Limited)

(Effective from 03rd March, 2025, as approved by The Board of Director on 03rd March, 2025)

OBJECTIVE:

This policy aims to establish an Internal Complaints mechanism to address and resolve sexual and discriminatory harassment complaints fairly, transparently, and promptly

SCOPE AND ENTITLEMENT:

KASLIWAL PROJECTS LIMITED (Formerly known as Kasliwal Projects Private Limited) ("The Company") is committed to maintaining a workplace that is free from all forms of discrimination, including sexual harassment. Any employee's behavior that fits the definition of sexual or discrimination harassment is a form of misconduct which may result in disciplinary action up to and including dismissal from the services of the company.

All employees have a right to work in an environment free from discrimination and harassing conduct, including sexual harassment. Harassment on the basis of an employee's race, color, creed, ancestry, national origin, age, disability, sex, arrest or conviction record, marital status, sexual orientation, membership in the military reserve or use or nonuse of lawful products away from work is expressly prohibited under this policy. Sexual harassment is prohibited by the Sexual Harassment Of Women At Work Place (Prevention, Prohibition And Redressal) Act, 2013

APPLICABILITY:

This policy is applicable to all complaints of sexual harassment or discrimination at work made by and against employees of KASLIWAL PROJECTS LIMITED (Formerly known as Kasliwal Projects Private Limited), as well as other vendors, trainees, probationers, temporary and contractual staff. This policy applies to workplace harassment and extends to employee interactions outside the workplace, including office transport, business trips, and training programs. This policy covers not only harassment in the workplace, but also any conduct involving employees outside the workplace including office cab, business trips, off site training programs, social events, etc.

PROCESS OWNER:

HR Department or any other respective Department of the Company.

STATEMENTS OF PRINCIPLE:

1. The Policy bestows the responsibility and obligation on the Management and also on every employee to contribute in maintaining a non-hostile and a conducive working environment. All employees should respect the dignity and personality of other employees.
2. The policy recognizes the right of complaint of every employee who has suffered

sexual harassment or discrimination harassment. It is in the self-interest of the complainant to make the complaint promptly.

3. The policy seeks to encourage employees to express freely, responsibly and in an orderly manner opinions and feelings about any problem or complaint of sexual harassment and discriminatory harassment.
4. Retaliation or victimization against any employee who report or provide information about sexual harassment or behavior that might constitute sexual harassment is strictly prohibited.
5. Any act of reprisal, including coercion or interference by an employee or their representative, violates this policy and will result in disciplinary action.
6. Any employee who engages in conduct amounting to be harassment, or who encourages such conduct by others, or who indulges in victimization of or retaliation against the complainant or the complainant's witnesses or the complainant's confidential counselor or any other employee who supported or supports them shall become liable for corrective action including appropriate disciplinary action, which may even include dismissal from service.
7. The policy recognizes the right of privacy of every individual and will strive to protect the privacy of the individuals involved and ensure that the complainant and the offender are treated fairly. Information about individual complaints and their disposition is considered confidential and will be shared only on need to know basis.
8. The Policy ensures that the career interest of both the parties will not be adversely affected merely on account of the complaint made to the Internal Complaints Committee.
9. Employees are encouraged to use the machinery provided by the company to redress or resolve such complaints.

DEFINITION:

Harassment is any unwanted and unwelcome behavior that causes a person to feel intimidated, victimized, uncomfortable, or threatened. It creates intimidating, hostile and unwelcome sexual advances, request for sexual favors or other verbal or physical conduct of a sexual nature, it is called Sexual Harassment. Sexual harassment includes unwelcome behavior in digital or online environments, such as sharing explicit content, making inappropriate comments via emails or chats, or engaging in cyberstalking.

MISCONDUCT:

- Asking for sex in exchange for a benefit
- Repeatedly asking for dates, and not taking "no" for an answer

- Demanding hugs
- Making unnecessary physical contact, including unwanted touching
- Using rude or insulting language or making comments toward women
- Calling people sex-specific derogatory names.
- Making sex-related comments about a person's physical characteristics or actions
- Saying or doing something because you think a person does not conform
- Verbal abuse of a sexual nature;
- Touching or grabbing of a sexual nature;
- Repeatedly standing too close to or brushing up against a person;
- Repeatedly asking a person to socialize during off-duty hours after they have declined or expressed disinterest...
- Giving gifts or leaving objects that are sexually suggestive;
- Repeatedly making sexually suggestive gestures;
- Making or posting sexually demeaning or offensive pictures, cartoons or other materials in the workplace;
- Off-duty unwelcome conducts of a sexual nature that affects the work environment
- Posting or sharing pornography, sexual pictures or cartoons, sexually explicit graffiti, or other sexual images (including online)
- Making sexual jokes
- Bragging about sexual prowess.

The Internal Complaints Committee to conciliate at the request of complaints.

POLICY DETAILS:

All employees must continue to act responsibly to help establish a comfortable working environment free from harassment for all. All employees are encouraged to raise questions they may have regarding these issues directly with their manager/supervisor (or any member of management) or with their Human Resources representative. The Company shall establish a secure and anonymous reporting channel for employees to report incidents of sexual harassment without revealing their identity.

COMPLAINT PROCEDURE:

KASLIWAL PROJECTS LIMITED (Formerly known as Kasliwal Projects Private Limited), has devised both for conciliatory as well as formal procedures for resolving complaints of sexual or discrimination harassment.

CONCILIATORY PROCEDURE:

The obvious merit of this procedure is that lesser people are involved, which would help to maintain confidentiality. It is also less cumbersome and speedy.

The complainant may resolve the matter directly with the alleged offender and report back to members of the Complaint Committee appointed by the Company,

If the complainant in question find it difficult or embarrassing to do this on his/her or her own, the complainant may take the support of confidential counselors appointed by the Company for this purpose. The counsellors would mediate between the complainant and the alleged offender and endeavor to redress the complainant's grievances without a formal enquiry or investigation within 15 days. Where the complainant is a woman, the counsellor will be a woman.

Both parties will be provided with a copy of the resolution and are free to opt for the formal procedure at any stage.

FORMAL PROCEDURE:

It is not obligatory for a complainant to invoke the conciliatory procedure. This is purely optional and it is open to a complainant to invoke the formal procedure in the first instance itself, without resorting to the conciliatory procedure.

To invoke the formal procedure the complainant shall raise a written complaint in 6 copies with supporting documents against the alleged offender to the Internal Complaints Committee established by the Company in terms of this policy at KASLIWAL PROJECTS LIMITED (Formerly known as Kasliwal Projects Private Limited), within three months of the incident.

On receipt of a formal complaint, the Internal Complaints Committee shall conduct an investigation with following timelines:

1. Copy of complaint to accused within 7 days of receipts of complaints.
2. Response of accused within 10 days of receipts of complaints.
3. The investigation will be concluded within 90 days of the receipt of the formal complaint with a 3 member of the Internal Complaints' Committee plus a proceeding officer during enquiry.

The Internal Complaints Committee will prepare a confidential report and the same will be forwarded to management with the necessary recommendations within 10 days of the conclusion of the investigation to take appropriate action.

All allegations of harassment will be investigated promptly and in a confidential manner, as reasonably possible, for an effective investigation.

The investigation may include interviewing the allegedly harassed employee, the allegedly harassing employee, any third-party witnesses, as well as considering any other potentially relevant information.

The company will work to eliminate the offending conduct and any employee who is found to have engaged in harassment in violation of this policy will be subject to disciplinary action, up to and including termination of employment.

The Internal Complaints Committee would keep a track of all cases pertaining to complaints of sexual harassment at various stages and facilitate closure of such cases as per the tenets of law.

INTERNAL COMPLAINT COMMITTEE:

An Internal Complaints Committee has been set up by the Company which will deal with all cases of alleged sexual or discrimination harassment whether escalated to it by any Company employee or taken up suo moto by the Company, to prevent and deal with sexual harassment and antidiscrimination harassment and to otherwise implement the Policy.

Composition: The Complaints Committee shall consist of minimum:

- a) Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case of non-availability of senior level woman employee, the Presiding Officer shall be nominated from administrative units of the work place.
- b) Not less than two (2) Members who have experience in social work or have legal knowledge:
- c) One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Subject always to at least half the members of the Complaints Committee being women and the Complaints Committee to be headed by a woman member to be appointed by the Complaints Committee from amongst its members. Provided however that a person shall cease to hold office as a member of the Complaints Committee if he/she ceases to be an employee on account of resignation, termination, and death or for any other reason whatsoever, and in such case the vacancy shall be filled immediately by the Company. It is further clarified that in case of a complaint where the alleged accused is senior in position to any of the employees who are members of the Complaints Committee, the Company shall ensure that such member is replaced with another employee who is either at same level or senior to the alleged accused within the organization.

DISQUALIFICATIONS: A person shall be disqualified for being appointed, elected, nominated or designated, or for continuing, as a member of the Complaints Committee, if there is any complaint concerning sexual harassment pending against him/her or if he/she is found guilty of sexual harassment.

CONFIDENTIALITY: To the fullest extent practicable and consistent with the Complaints Committee's need to investigate and ensure that corrective action is taken, all complaints of sexual harassment by employees will be processed with strict confidentiality. The Company shall ensure strict confidentiality of complaints, proceedings, and findings through secure digital and physical measures to prevent unauthorized access or leaks.

FILING A COMPLAINT:

Any aggrieved employee may approach the Complaints Committee with a complaint of sexual harassment in terms of the Policy. The following steps will be followed in this

regard: -

- (a) A written complaint of sexual harassment and anti-discrimination harassment can be filed within a time limit of three (3) months. This may be extended to another three (3) months if the woman can prove that grave circumstances prevented her from filing the Complaint earlier.
- (b) An employee making a Complaint in writing, ("Complainant") will be afforded full confidentiality at this stage.
- (c) No person against whom a Complaint is made shall be part of the Complaints Committee.
- (d) Within seven (7) working days of the receipt of the Complaint, the Complaints Committee will convene a meeting of which advance written intimation will be given.
- (e) At this meeting, the complainant will be entitled to be present personally.

PROCEEDINGS OF THE COMPLAINTS COMMITTEE:

The Complaints Committee is intended to be an independent, objective and un-biased fact-finding body set-up to investigate any complaints of sexual harassment and discriminatory harassment at workplace in a fair, reasonable and time-bound manner in a neutral environment. It will broadly be governed by the following principles in conducting its proceedings: -

- (a) The Complaints Committee shall give every reasonable opportunity to the complainant and the counter party, for putting forward and defending their respective cases and to ensure that the complainant and the counter party have full opportunity to present their claims, witnesses and evidence which may establish or substantiate their claims.
- (b) Both the complainant and the counter party shall have the right to submit supporting evidence and shall have the right to bring their respective witnesses, if any, to be examined by the Complaints Committee.
- (c) If considered appropriate by the Internal Complaints Committee, all meetings of the Complaints Committee including with the complainant, the counter party or any witnesses shall be held outside the relevant office and in a neutral venue.
- (d) The complainant, the counter party or any other person that the Internal Complaints Committee meets with or interacts or has a teleconference or video conference for the purpose of enquiry into any complaint of sexual harassment shall be bound by strict confidentiality and each such party shall not be permitted to discuss the proceedings with the Internal Complaints Committee with any third person (other than their respective family members).

- (e) All the proceedings of the Internal Complaints Committee will be summarized by the Internal Complaints Committee. In the event any Party is desirous of submitting a statement in writing or reviewing the summary of discussion prepared by the Internal Complaints Committee, such statement shall be endorsed by such Party in token of authenticity thereof and submitted to the Internal Complaints Committee.
- (f) The Internal Complaints Committee is required to complete the inquiry within a time period of ninety (90) days from the date on which the complaint is filed by the complainant.
- (g) The Internal Complaints Committee shall complete the enquiry and make a report of its findings on the complaint and its recommendations to the senior management of the Company ("Management") ** within a period of ten (10) days from the conclusion of the enquiry procedure set out herein. The report of the Complaints Committee shall include recommendations for imposition of penalty and the reasons for such recommendations to the Management.
- (h) The Internal Complaints Committee shall track and report on the implementation of recommended corrective actions to ensure the resolution and prevention of future incidents.
- (i) The Internal Complaints Committee shall leverage technology, including video conferencing and secure online portals, for evidence submission and interviews to facilitate efficient investigations.
- (j) The Internal Complaints Committee shall submit Annually reports to the Board of Directors, summarizing complaint trends, resolutions, and recommendations for improvement.

**Management: person or board or committee responsible for formulation/administration of policies.

IMPLEMENTATION OF RECOMMENDATIONS OF THE COMPLAINTS COMMITTEE

The Management shall consider the recommendations and findings of the Internal Complaints Committee and take a decision within sixty (60) days of the submission of the report by the Internal Complaints Committee. The Management may issue such order and, or, directions as it deems fit. The Management shall inform of its decision to the complainant and the counter party. The Management of the Company shall provide all necessary assistance to the Internal Complaints Committee for the purpose of ensuring full, effective and speedy implementation of this procedure for investigating any complaint of sexual harassment at work place in accordance with the Policy.

ADDITIONAL DUTIES OF INTERNAL COMPLAINTS COMMITTEE

- a) Preparing and submitting annual reports for statutory compliance to Management to be forwarded to the relevant government authorities.

- b) Issuing from time to time notifications, guidelines, and the like, for combating sexual harassment at work, as well as carrying out amendments in consonance with legislation and latest judgments on the issue;
- c) Contributing to the promotion of appropriate work conditions, leisure, health hygiene and ensure that there is no hostile discrimination at workplaces because of the gender/sex of such person; and
- d) Ensuring policy compliance from all concerned involved reviewing the policy every year and also processing compliance quarterly.

DISCIPLINARY ACTION:

If the result of the investigation/enquiry holds the alleged offender guilty of an act constituting sexual harassment, the Management shall take appropriate disciplinary action against the offender.

The punishment imposed shall commensurate with the gravity of the misconduct and other relevant circumstances prevailing.

PENALTIES:

The Management can impose the following penalties on an employee held to be guilty of sexual harassment. These penalties shall be determined according to the facts and circumstances of each complaint and may include:

1. Verbal warning;
2. Written warning;
3. Withholding of increment /promotion;
4. Demotion to a lower grade or position;
5. Termination of service

MONETARY COMPENSATION:

If the counter party is found guilty of a serious instance of sexual harassment at workplace, The Internal Complaints Committee can also recommend monetary compensation in favor of the complainant by way of a deduction from the salary or wages of the counter party, in addition to all these penalties, the employee can also be required to give a written apology to the complainant and upon failure to do so, the punishment can be enhanced. In the event the complainant decides to pursue personal action against the counter party, the Company is obliged to provide all assistance and cooperation in any investigation by the relevant law enforcement agencies.

THIRD PARTY HARASSMENT:

KASLIWAL PROJECTS LIMITED (Formerly known as Kasliwal Projects Private Limited), also stands committed to take appropriate preventive and remedial action to prevent sexual harassment of its employees by non- employees. Where sexual harassment

occurs as a result of an act by any third party or outsider, the Management would take all steps necessary and reasonable to assist the victim in terms of support and preventive action. Should any employee face sexually harassing behavior at work from a third party, such as a client, or customer of KASLIWAL PROJECTS LIMITED (Formerly known as Kasliwal Projects Private Limited), the Management would take appropriate corrective or remedial action.

In cases of third-party harassment, the Company shall take appropriate remedial actions and collaborate with law enforcement agencies to ensure the safety and justice for the complainant.

However, it would be necessary for the complainant/recipient to promptly report such harassment to the Management or the complainant so as to enable the Management to take appropriate action. Within 3 months of period the case or complaint has to be registered else will not be applicable under this policy.

OBLIGATION OF COMPANY

1. The Company does not tolerate sexual harassment of any kind and will take action against any employee for any unwelcome, sexually determined behavior, direct or by implication including physical contact and advances, a demand or request for sexual favors or other unwelcome physical, verbal or non-verbal conduct of a sexual nature either explicitly or implicitly, in return for a term or condition of instruction, employment, participation or evaluation of a person's engagement in any activity of the Company.
2. The Company shall be responsible, among others, for the following:
 - (a) Prohibit, prevent and deter commission of acts of sexual harassment;
 - (b) Implement the Policy by providing "discrimination and hostility free" work environment;
 - (c) Spread awareness of the Policy amongst its employees, including by publication, notification and circulation of the Policy;
 - (d) Provide fair and impartial procedures for resolution, settlement or prosecution of acts of sexual harassment by taking all necessary steps, including those more particularly provided hereinafter;
3. The Company shall make annual report on compliance with the Policy which is to be submitted to the appropriate Government authority, if applicable.
4. At the request of aggrieved person Internal Complaints Committee will initiate the process.
5. Protection against Retaliation and Victimization
 - (a) In the event the counter party is the complainant's Supervisor/Superior, the

Company shall, during the pendency of the complaint, ensure that the reporting relationship is suspended and that the complainant is not subject to appraisal by the counter party.

- (b) The Company shall strictly prohibit any sort of retaliation against the complainant or any witnesses. Any act of reprisal, including internal interference, coercion and restraint, by the counter party, whether directly or indirectly, will result in appropriate action against the counter party by the Management in consultation with the Internal Complaints Committee.
- (c) Where the counter party is an outsider, during the pendency of the investigation of the complaint and even thereafter, if he is found guilty, the counter party shall not be allowed to enter the Company premises except for the purpose of attending the complaint. (d) In the event of the counter party and the complainant both being employees of the Company, and the counter party is found to be guilty, irrespective of the penalty imposed, the Company shall ensure that the counter party shall not write the appraisal reports of the complainant, if he is otherwise so authorized.
- (d) In the event, the Internal Complaints Committee after investigation of a complaint in accordance with the procedure prescribed herein, concludes that the complaint was false, frivolous or made with malafide intention by the Complainant including due to personal issues with the counter party, then the Internal Complaints Committee shall make such appropriate recommendations to the Management to take action against the complainant, as may be necessary.
- (e) The Company is prohibited from divulging the contents of the complaint, inquiry proceedings and the Committee recommendations to the public, press and media in any manner or from making available any information that divulges the identity of parties.

For KASLIWAL PROJECTS LTD.

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Director