SINCE 1987

ROYAL CHAIN LIMITED

(FORMERLY KNOWN AS ROYAL CHAIN PRIVATE LIMITED & ROYAL CHAINS PRIVATE LIMITED)

GST : 27AAGCR6146R1ZL CIN : U74120MH2013PLC247888

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POLICY FOR PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

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POLICY FOR PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE

*Pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**POSH Act**") and the rules framed thereunder, as may be amended from time to time*

A. PREAMBLE

Royal Chain Limited (hereinafter referred to as the "**Company**") is committed to creating a safe and secure working environment for all women employed or engaged by the Company. The Company believes that all women employed or engaged by it should enjoy a working environment that is free from harassment, including that which is sexual in nature, unlawful discrimination and intimidation emanating as a result thereof. The Company has zero-tolerance of any action that amounts to sexual harassment against women in the Workplace (*defined below*) in any form or in any manner. The main purpose of this policy is to promote a safe working environment for women, free from sexual harassment, in which persons of all genders work and complement each other as equals.

B. DEFINITIONS AND INTERPRETATIONS

a) **Sexual Harassment:**

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), occurring on any medium, whether physical or virtual, namely:

- Physical contact and advances;
- Demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
  The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behaviour of sexual harassment (as defined above), will also amount to sexual harassment:
- Implied or explicit promise of preferential treatment in employment; or
- Implied or explicit threat of detrimental treatment in employment; or
- Implied or explicit threat about her present or future employment status; or
- Interference with her work or creating an intimidating or offensive work environment; or
- Humiliating treatment likely to affect health or safety.

Sexual harassment will also include unwelcome sexually determined behaviour by any person either individually or in association with other persons or by any person in authority whether directly or by implication, through any medium, whether physical or virtual or in a work from home environment. Some examples of behaviour that constitute sexual harassment at the Workplace are mentioned herein below:

- Unsavoury remarks or serious or repeated offensive remarks, such as teasing related to a person's body or appearance;
- Intimidation, threats, blackmail around sexual favours;
- Threats, intimidation or retaliation against an employee who speaks up about unwelcome behaviour with sexual overtones;

- Teasing, voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and/or touching against one's will or any such act likely to intrude upon one's privacy, persistent watching, following, contacting of a person;
- Unwelcome social invitations, with sexual overtones commonly understood as flirting;
- Inappropriate physical contact or advances, including (but not limited to) touching, sounds which have explicit and/or implicit sexual connotations/overtones, caressing, kissing or fondling someone against her will (could be considered assault);
- Invasion of personal space (getting too close for no reason, brushing against or cornering someone);
- Persistently asking someone out, despite being turned down;
- Stalking an individual and/or eve teasing;
- Falsely accusing and undermining a person behind closed doors for sexual favours;
- Controlling a person's reputation by rumour-mongering about her private life;
- Giving gifts or leaving objects that are sexually suggestive;
- Making requests for video calls unnecessarily or at an inappropriate time;
- Being inappropriately dressed on video calls and violating the acceptable dress code while attending video calls/meetings on digital platforms;
- Sending inappropriate jokes/texts/forwards on social media/digital platforms; and
- Displaying pictures, signs etc. of sexual nature/connotation/overtones in the work area and work-related areas, or displaying provocative content in the background while attending to video calls by participants who are privy to such calls.

It is important to note that whether sexual harassment has occurred or not does not depend on the intention of the persons involved but on the experience of the Aggrieved (*as defined above*).

It is hereby clarified that if an act mentioned in any of the other policies of the Company amounts to or is construed as sexual harassment, then the same shall be dealt with in the manner prescribed under this POSH Policy.

b) **Personnel:**

This POSH Policy is applicable to the workforce of the Company, whether employed on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes the management representatives, a co-worker, probationer, contract worker, trainee, apprentice or called by any other such name ("**Personnel**").

c) **Workplace:**

It includes: (i) any place where the Personnel carry out their duties and responsibilities for the Company such as their residence; (ii) any digital platforms utilised by any Personnel, in the course of their employment or engagement with the Company; (iii) wherever the Company carries its operations including all premises, locations, establishments, enterprises, institutions, offices, branches, or units established, owned or controlled by the Company and off-sites of the Company; and (iv) Company sponsored events and places visited by the Personnel where services are rendered or arising out of or during the course of employment or engagement, as the case may be, including official events, accommodation and transportation provided by the Company for undertaking such journey.

d) **Aggrieved :**

A complaint can be filed under this POSH Policy by any Personnel and any third party or an outsider and is a victim of sexual harassment as a result of an act by a Personnel ("**Aggrieved**") during the course of employment or rendering of service at the Workplace (the "**Complainant**").

e) **Internal Complaints Committee (ICC):**

A committee constituted by the Company in accordance with the POSH Act to redress complaints of sexual harassment under this POSH Policy.

C. SCOPE AND APPLICABILITY

This POSH Policy is applicable to the workforce of the Company, whether employed on a regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes the management representatives, a co-worker, probationer, contract worker, trainee, apprentice or called by any other such name. This POSH Policy is subject to and has been drafted in accordance with the POSH Act, as may be amended from time to time. Any matter which has not been specifically covered or discussed under this POSH Policy, shall be dealt with in the manner prescribed under the POSH Act. Every Personnel should take the time to ensure they understand what types of behaviour are unacceptable under this POSH Policy, and how the Company will handle complaints of sexual harassment. Ignorance of this POSH Policy will not be a valid defence in case of any non-compliance or violation thereof.

D. OBJECTIVE

The objective of this POSH Policy on Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace is to educate all persons employed or engaged by the Company on what conduct constitutes sexual harassment, the ways and means to prevent occurrence of such conduct, the penal consequences of sexual harassment against women and the redressal mechanism in the event of occurrence of sexual harassment.

E. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All Personnel have a personal responsibility to ensure that their behaviour is not contrary to this POSH Policy. All Personnel are encouraged to reinforce the maintenance of a work environment free from sexual harassment. All Personnel have a duty to cooperate in the Company's investigation of alleged sexual harassment. Failure to cooperate or deliberately providing false information during an investigation will be grounds for disciplinary action, up to and including termination.

F. THIRD PARTY HARASSMENT

Where sexual harassment of the Complainant occurs as a result of an act or omission by any third party, including the Company's vendors or contract labour deployed by such vendors, customers or a visitor, then the Company shall take all necessary and reasonable steps to assist the affected Complainant to lodge a complaint with the appropriate forum against such third party and/or shall also take action against such third party as per this POSH Policy and the POSH Act and subject to the terms of contract, if any, with the employer of the third party.

Where sexual harassment occurs as a result of an act or omission by a respondent (who is employed on the rolls of the Company) against a third party including the Company's vendors and/or its/their employees, or customers or visitors ("**External Party**") in the course of official duties, inside or outside the premises of the Company, then the Company shall, take such action against such employee as may be appropriate, based on due investigation as per the process set out under this POSH Policy and the POSH Act and subject to the terms of contract, if any, with the employer of the External Party.

G. COMPLAINT MECHANISM

All complaints should be submitted in writing to all or any member of the ICC, by hard copy submitted to any member of the ICC, or by email. The Complainant is required to provide supporting documents and the names and addresses of witnesses, if any, in writing/by email. If a verbal complaint is received by the ICC, the Complainant will be required to submit the complaint in writing/by email, along with the supporting documents, as soon as possible thereafter or within the timeline indicated by the ICC in this regard.

H. INTERNAL COMPLAINTS COMMITTEE (ICC)

1. Complaints of sexual harassment will be promptly and thoroughly investigated by the Internal Complaints Committee ("**ICC**"), which shall be constituted in accordance with the POSH Act as set out below. The ICC will comprise a minimum of the following 4 (four) members:
2. The composition of the ICC shall be as follows:

    a) The Presiding Officer of the ICC shall be a woman employed at a senior level at the Workplace ("**Presiding Officer**"). Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.
    b) 2 (two) members of the ICC will be selected from among the employees, preferably who are committed to the cause of women or have experience in social work or have legal knowledge.
    c) 1 (one) member of the ICC will be selected from a non-governmental organization or association committed to the cause of women or a person familiar with issues relating to sexual harassment ("**External Member**").

    At least one half of the members of the ICC will be women. The Presiding Officer and every member of the ICC will hold office for the period that they are appointed for, which will not exceed 3 (three) years from the date of their nomination as may be specified by the Company, and can be extended for a further period, at the discretion of the Company.

3. The ICC is responsible for:

    a) Receiving complaints about sexual harassment at workplace;
    b) Investigating every formal written complaint of sexual harassment;
    c) Co-ordinating with employer in implementing appropriate action;
    d) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
    e) Discouraging and preventing employment-related sexual harassment.

    The Company shall, from time to time, review the membership of the ICC and make appropriate changes (increase the number of ICC members, if required, for any office/location, upon notification to the

employees) so long as the ICC is fully compliant with the provisions of the POSH Act.

Based on the nature/gravity/complexity of the complaint, the Company reserves the right to appoint additional member(s) on the panel of the ICC, to address such specific complaints.

The ICC will investigate the alleged sexual harassment while maintaining a strict level of confidentiality.

For purpose of making an inquiry, the ICC shall have the same powers as are vested in the civil court under the Code of Civil Procedure, 1908, which will include the power to summon and enforce the attendance of any person, whether in person or virtually, require the discovery and production of documents, and regarding any other matter which may be required during the investigation into a complaint under this POSH Policy.

Subject to applicable laws, the ICC is empowered to conduct any inquiries under this POSH Policy via video conferencing on a medium of choice. All Personnel agree and acknowledge that it shall be the sole prerogative of the ICC, whether to conduct a physical or virtual hearing and shall not make any claims in relation to the mode in which the hearing is conducted.

I. PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

1. Conciliation Proceedings

   a) Before initiating an inquiry into a sexual harassment complaint and upon request of the Complainant, the ICC can take steps to settle the matter between the Complainant and the respondent (against whom the complaint is filed) through conciliation, provided that no monetary settlement shall be the basis of such conciliation.
   b) Where a settlement has been arrived at between the parties, as a result of such conciliation, no further inquiry shall be conducted by the ICC, but it shall record the settlement so arrived at and forward the same to the Company to take action as specified in the recommendation. Copies of the settlement must also be provided to both parties.

   Where the Complainant informs the ICC that any term or condition of the settlement arrived at is not complied with by the respondent (against whom the complaint is filed), the ICC can proceed to make an inquiry into the Complaint in accordance with this POSH Policy or forward the complaint to the police, in accordance with this POSH Policy read with applicable laws.

2. How to File a Complaint

   a) All complaints should be submitted in writing to all or any member of the ICC, by hard copy submitted to any member of the ICC, or by email. The Complainant is required to provide supporting documents and the names and addresses of witnesses, if any, in writing/by email. If a verbal complaint is received by the ICC, the Complainant will be required to follow the process set out in this clause and submit the complaint in writing/by email, along with the supporting documents, as soon as possible thereafter or within the timeline indicated by the ICC in this regard.

b) Where a complaint cannot be made in writing, the Presiding Officer or any member of the ICC, as the case may be, will render all reasonable assistance to the Complainant, for making the complaint in writing.

c) If the Complainant is unable to make a complaint on account of her physical incapacity, a complaint may be filed by: (i) her relative or friend; or (ii) her co-worker; or (iii) an officer of the National Commission for Women or State Women's Commission; or (iv) any person who has knowledge of the incident, with the written consent of the Complainant.

d) If the Complainant is unable to make a complaint on account of her mental incapacity, a complaint may be filed by: (i) her relative or friend; or (ii) a special educator; or (iii) a qualified psychiatrist or psychologist; or (iv) the guardian or authority under whose care she is receiving treatment or care; or (v) any person who has knowledge of the incident jointly with her relative, friend, special educator, qualified psychiatrist or psychologist, guardian or authority under whose care she is receiving treatment.

e) If the Complainant is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Complainant's legal heir. If the Complainant is unable to make a complaint on account of any other reason, a complaint may be filed by any person who has knowledge of the incident, with her written consent.

3. On receipt of the complaint, the Presiding Officer shall evaluate if any of the members of the ICC are: (i) disqualified as per the provisions of the POSH Act; (ii) unavailable to fulfil their obligations as an ICC member; (iii) is involved in or closely connected with the complaint so as to result in a conflict of interest with that of the parties involved. In the event of a conflict of interest, the Presiding Officer may ask the Company to replace such members on the ICC for the investigation into the relevant complaint. The ICC members will also have the obligation to report to the Company representative, about any conflicts that they have with any particular matter.

4. Key Steps and Timelines for Filing and Redressal of Complaints

Subject to the clauses above, any complaint of sexual harassment will be redressed in the following manner:

Step	Action	Time Period
Step 1	The Complainant files a complaint in writing to the ICC.	Within 3 (three) months from the date of the incident or in the case of a series of incidents, within a period of 3 (three) months from the date of the last incident. The ICC may extend this time period for an additional period of 3 (three) months, if it is satisfied that there were circumstances that prevented the Complainant from filing the complaint within the said time period, with reasons to be recorded in writing.
Step 2	On receipt of the complaint, the ICC sends the complaint to the respondent.	Within 7 (seven) working days of receipt of the complaint.
Step 3	The respondent files a reply to the complaint (with a list of documents and the names and addresses of witnesses) to the ICC.	Within 10 (ten) working days of receiving the copy of the complaint, as indicated by the ICC.
Step 4	The ICC initiates action and	Within 90 (ninety) days of the complaint being filed.

	completes its inquiry. Where both the parties are employees on the rolls of the Company, a copy of the findings shall be made available to both the parties, enabling them to make a representation against the findings before the ICC.	
Step 5	The ICC submits a report of its findings and recommendations to the Company for implementation (a copy of the report is to be provided to both parties).	Within 10 (ten) days of the completion of the inquiry.
Step 6	The Company implements the recommendations of the ICC.	Within 60 (sixty) days of the receipt of the report of the ICC.
Step 7	The Complainant or respondent may file an appeal to a court or tribunal in accordance with the provisions of the POSH Act against breach of the terms of conciliation, or recommendations of the ICC or non-implementation of recommendations by the Company.	Within 90 (ninety) days of the receipt of the report of the ICC.

Any complaints made beyond or outside the time limit provided by the POSH Act, may be taken up by the Company, at its sole discretion and such complaints will be handled as per the disciplinary policy of the Company, by such authority as appointed by the Company.

Notwithstanding the foregoing, all women employees are encouraged to file sexual harassment complaints with the ICC as soon as possible and within the timelines indicated under the POSH Act, so that the matter can be resolved/redressed at the earliest.

5. Penalties for Sexual Harassment

6. Salient Features and Manner of Inquiry into the Complaint

Guiding principles: The ICC will conduct inquiry into the complaint in accordance with principles of natural justice. Particularly, the ICC will observe the following guidelines, where necessary:

- The ICC shall interview the relevant persons and call for or inspect necessary documents and records.
- The respondent and the Complainant shall be given a fair and reasonable opportunity to present their case, to call for their evidence and to cross-examine the Complainant and the witnesses, in the manner prescribed hereunder, if any.
- The Complainant and the respondent shall be called separately, for investigation, if so requested by either party, to ensure freedom of expression and an atmosphere free of intimidation.
- The cross examination, if so requested by either party, will not be face to face and will be done by submitting questions in writing to the ICC, who will obtain the responses and provide the same to the examiner.

Quorum: While conducting an inquiry, a minimum of 3 members of the ICC including the Presiding Officer and the External Member will be present.

Lawyer of either party not allowed: The parties shall not be allowed to bring in any legal practitioner to represent them in their case, at any stage of the proceedings before the ICC. However, the ICC/Company will have the right to seek legal advice or can consult any expert/subject matter expert apart from obtaining legal advice on the complaint and/or any matter pertaining to sexual harassment filed by the Complainant to ensure compliance with the provisions of the POSH Act and/or any related matter.

Ex-parte decisions: The ICC may give an ex-parte decision or terminate the inquiry proceedings, if the Complainant or the respondent fails to appear before the ICC for 3 consecutive hearings without sufficient cause. However, the ICC will give a prior written notice of 15 (fifteen) days to the concerned party before taking any such decision.

7. Relief to Complainant During Pendency of the Inquiry

The Company shall, pending completion of the inquiry, implement any one or more of the following interim measures recommended by the ICC on a written request made by the Complainant:

- Transfer the Complainant or the respondent to another office of the Company, if applicable; or
- Grant leave to the Complainant for up to 3 (three) months in addition to leave already entitled; or
- Restrain the respondent from reporting on the work performance of the Complainant or writing her confidential report and assign the same to another officer; or
- Grant such other relief as may be appropriate.

a) Reprimand or censure;
b) Warning;
c) Fine;
d) Withholding of pay rise or increments;
e) Loss of pay or loss of seniority;
f) Termination of employment with or without notice or compensation in lieu of notice; counselling or carrying out community service; appropriate legal proceedings; written apology; and/or any other action that the ICC may deem appropriate.

8. Apart from sexual harassment, if any Personnel commits the following acts, such person shall also be punishable with penalties, as set out previously, on the grounds of misconduct: (i) making false allegations of sexual harassment, with malicious intent and knowledge that such allegation is false or producing false evidence to justify such complaint; (ii) giving false evidence or producing false documents as a witness to any proceedings of the ICC; (iii) breaching the statutory duty of maintaining confidentiality of information relating to the inquiry proceedings of the ICC, by divulging such information to any unauthorized person; and/or (iv) victimizing, intimidating or influencing any person, witness or any other persons seeking redress under this POSH Policy whether directly or indirectly. It is clarified that the mere inability to substantiate a complaint or provide adequate proof will not be treated as a false complaint.

In addition to the above, the ICC may deduct a sum from the salary or wage of the respondent (if the respondent is found guilty) of such amount as it may consider appropriate for payment to the

Complainant or to the Complainant's legal heirs.

If the ICC arrives at a conclusion that the allegation of sexual harassment against the respondent has not been proved, then it may recommend to the Company that no action be taken in the matter.

Explanation: In addition to the penalties attracted for misconduct under the POSH Act or this POSH Policy, any person breaching the confidentiality requirement as set out above, shall be liable for action as per this POSH Policy and/or internal policies of the Company in this regard and/or applicable laws (including a fine of INR 5,000 as prescribed under the POSH Act).

Any breach of instructions provided by the ICC in connection with virtual hearings will be treated as an act of misconduct which can lead to disciplinary action.

J. CONFIDENTIALITY

1. All proceedings, documents and records maintained under this POSH Policy, including the names of the Complainant, respondent and witnesses shall be confidential and shall be dealt with in the manner provided under the POSH Act.

2. All persons involved in the proceedings under this POSH Policy including the parties, witnesses, ICC members and any other Personnel who becomes aware of any incident of sexual harassment, whether directly or indirectly, shall be under a duty to respect and maintain confidentiality.

Further, care should be taken that the name, address, identity or any other particulars that could lead to the identification of the Complainant, the respondent or the witnesses should not be disclosed.

If any member of the ICC or any Personnel who is entrusted with the duty to handle or deal with the complaint, inquiry, recommendations or action to be taken, breaches the confidentiality obligation, then such person will no longer continue to be a member of the ICC. Further, if such person is an employee of the Company, then their act of breach will be treated as misconduct which can lead to a disciplinary action, up to and including termination.

Please note that any derogatory or defamatory statements against the Company, Company representative, ICC or the opposite party, prior to, during or after the completion of the inquiry is also expressly prohibited, and may be treated as misconduct which can lead to disciplinary action, up to and including termination.

Where any proceedings under this POSH Policy are conducted virtually via digital platforms, care should be taken that the obligation to maintain confidentiality is not breached. Further, no other persons except for the individual who has been asked to join the virtual meeting, should be present in the room or be allowed to overhear the discussion/conversation. Any breach of this obligation will be subject to disciplinary action by the Company.

K. ACCESS TO REPORTS AND DOCUMENTS

Publishing/communicating or in any other manner making known to other people in the Company, public, press or media (including by way of social media, such as Facebook, X, Instagram, WhatsApp, LinkedIn etc.) any

information in relation to the contents of the complaint, the identity and addresses of the Complainant, the respondent or the witnesses, the conciliation and inquiry proceedings, recommendations of the ICC, or the action taken by the Company is prohibited.

L. PROTECTION TO COMPLAINANT / VICTIM

1. The Company will not retaliate, and has zero-tolerance for any retaliatory action, against any Personnel or an Aggrieved who files a complaint of sexual harassment in good faith or is a witness in the ICC proceedings.
2. The Company will ensure that the Complainant or a person who has given evidence as part of an inquiry, in good faith, is protected and not victimized or discriminated against in their career in the Company.
3. In the event that the Complainant opts to file a complaint under the Bharatiya Nyaya Sanhita, 2023, as amended ("**BNS**") or any other law for the time being in force, in relation to an alleged offence of sexual harassment, the Company will: (i) assist the Complainant in filing such complaint, and (ii) initiate action against the perpetrator (under the BNS or any other law for the time being in force), if the Complainant so desires.

M. AMENDMENTS, MODIFICATIONS AND WAIVERS

The Company reserves the right to modify or terminate this POSH Policy without prior notice, subject to applicable laws. Any amendments to this POSH Policy will be updated and will be binding on all Personnel. Any exceptions/deviations to this POSH Policy shall be subject to the POSH Act and other applicable laws.

N. APPROVAL AND DISSEMINATION OF POLICY

The Company shall: (i) provide a safe working environment at the Workplace, including safety from persons coming into contact at the Workplace; (ii) display at any conspicuous place in the Workplace or publish on their website/circulate via email, the penal consequences of sexual harassment and the order for constitution of the ICC; (iii) give necessary assistance and facilities to the ICC for dealing with the complaint and conducting the inquiry, physically and/or virtually; (iv) conduct periodical training sessions for the members of the ICC including capacity building and skill building programmes; (v) declare the names and contact details of all the members of the ICC separately; (vi) spread awareness by organizing workshops and awareness programmes at regular intervals for sensitizing the Personnel and orientation for the ICC members with the provisions of the POSH Act and this POSH Policy (attendance shall be mandatory for all Personnel); (vii) provide assistance to the Complainant if she chooses to file a complaint in relation to the offence under the BNS or any other law for the time being in force; (viii) cause to initiate action, under the BNS or any other law for the time being in force, against the perpetrator, or if the Complainant so desires, where the perpetrator is not related to the Company or its affiliates, in the Workplace at which the incident of sexual harassment took place; and (ix) monitor the timely submission of reports by the ICC.

O. CONCLUSION

Subject to any local laws (if any), the Company may electronically record the proceeding of the meeting(s)/enquiry proceeding(s) either in audio format and/or video format. It is however clarified that Personnel are neither allowed to make electronic recordings of any meetings conducted under this POSH Policy nor demand a copy thereof from the ICC and/or the Company. Recording any meetings electronically by any Personnel will be considered as a serious misconduct under the internal rules/policies of the Company and/or this POSH Policy and will attract disciplinary action against them under the Company's internal policies and/or applicable laws.

Effective Date:
Date of Approval by the Board: 8th September, 2026

Sd/-
Chairman Signature

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