



SHIVALIK

SBCL/PSHP/V03

Shivalik Bimetal Controls Limited

Prevention of Sexual Harassment Policy

I. COMMITMENT:

Our Company is committed to provide a work environment that ensures every Employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promote a work environment that is conducive to the professional growth of its Employees and encourages equality of opportunity to all Employees.

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.

Through this gender-neutral policy, we exhibit our commitment to provide enabling work conditions and a workplace that is gender sensitive and recognizing role of every employee (regardless of gender) as an equal player, agent, and leader of change in their families, communities, workplace and society.

The Policy is made and amended from time to time by Company under the overall ambit and in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act")**.

II. OBJECTIVE:

The Company recognizes that-

- (a) Sexual Harassment at Workplace is a form of gender discrimination which violates various fundamental rights of Employees including right to equality and right to life, guaranteed under Articles 14, 15 and 21 of the Constitution of India.
- (b) The mandate of protection and prevention, delineated in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, extends to all organizations which employ/ work with women.

This POSH policy is compliant not only with the POSH Act and Rules, 2013 but also recognizes and addresses the vulnerabilities of all Genders. It covers a variety of situations through wide definitions of "gender", "sexual harassment", "workplace", "employee" etc. that are integral for the implementation of the policy and its objectives.

III. SCOPE:

This policy applies to all categories of Employees of the Company and its subsidiaries, including permanent management and workmen, temporaries, trainees and employees on contract at its workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

IV. DEFINITIONS:

- a) "Company": means Shivalik Bimetal Controls Limited and its subsidiaries.
- b) "Complainant": means, in relation to a Workplace, a man or a woman, of any age who alleges to have been subjected to any act of sexual harassment by the Respondent.
- c) "Employee": An employee shall have the same meaning and import as assigned to it under Section 2(f) of the POSH Act, 2013 and is thus defined as-
"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 co-worker, a contract worker, probationer, trainee, apprentice, intern, volunteer or called by any other such name".
- d) "Gender": includes men, women and third gender and refers to the social attributes and opportunities associated with being male, female, third gender and non-binary as well as the relationships between and among them.
- e) "Internal Complaints Committee": means, in pursuance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act of 2013 and its Rules, an Internal Complaints Committee that has been constituted to redress complaints of sexual harassment at the workplace. The ICC is the sole inquiring authority into all complaints of sexual harassment at the workplace and a recommendatory body for disciplinary actions thereof based on the findings of the inquiries. Intimation regarding ICC and its composition would be sent through office emails.
- f) "Respondent": against whom the aggrieved person has made a complaint
- g) "Sexual harassment": includes any unwelcome sexually determined behaviour, direct or by implication, and includes physical contact and advances, a demand or request for sexual favours, sexually colored remarks, showing pornography, any other unwelcome

physical, verbal or nonverbal conduct of a sexual nature. Examples of Sexually Oriented behaviour are provided in **Annexure I** of this policy.

h) "Workplace": The workplace includes:

- All offices or other premises where the Company's and its subsidiaries' business is conducted.
- All company and its subsidiaries-related activities performed at any other site away from the Company's and subsidiaries' premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- The remote working environment, including an employee's home or any other location used for performing work, attending virtual meetings, engaging in official communication, or undertaking any work-related activity on behalf of the Company or its subsidiaries.

V. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All Employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All Employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

VI. COMPLAINT MECHANISM:

Whether or not such conduct constitutes an offence under law or a breach of the service rules, an appropriate complaint mechanism in the form of "**Internal Complaints Committee**" has been created in the Company for time-bound redressal of the complaint made by the victim.

VII. INTERNAL COMPLAINTS COMMITTEE ('ICC'):

In pursuance of the mandate under the POSH Act 2013, every employer of a workplace shall, by an order in writing, constitute a Committee to be known as the "Internal Complaints Committee (ICC)" to receive, hear and redress any and all complaints pertaining to sexual harassment at workplace.

The ICC shall consist of:

- i) a Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the employees;
- ii) not less than 2 members from amongst employees, preferable committed to the cause of women or who have had experience in social work or have legal knowledge.
- iii) one member from amongst NGOs / associations committed to the cause of women or a

person familiar with the issues relating to sexual harassment.

(Provided that at least one-half of the total members so nominated shall be women)

The tenure of ICC shall be 3 years and there shall be separate Internal Complaints Committees at each location and each city.

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

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

A. Informal Resolution Options

1. When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.
2. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, they can bring their concerns to the attention of the ICC for redressal of their grievances. The ICC will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

B. Complaints

1. Any Complainant/victim with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson of the ICC constituted by the Company. The complaint shall have to be in writing and can be in the form of a letter, preferably within 15 days from the date of occurrence of the alleged incident, sent in a sealed envelope. Alternately, the Employee can send the complaint through an email. The Employee is required to disclose their name, department, division and location they are working in, to enable the Chairperson to contact them and take the matter forward.
2. The Chairperson of ICC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint. In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not mean an offence of Sexual Harassment, he/she will record this finding with reasons and communicate the same to the Complainant.
3. If the Chairperson of ICC determines that the allegations constitute an act of sexual harassment, he/she will proceed to investigate the allegation with the assistance of the ICC.

4. Where such conduct on the part of the accused amounts to a specific offence under the law, offer assistance to him/her by making a complaint with the appropriate authority.
5. The ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Company(S.13) as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. The Company will ensure corrective action on the recommendations of the Internal Complaints Committee and keep the Complainant informed of the same.

Corrective/ Penal action may include any of the following:

- a. Formal apology
 - b. Counselling
 - c. Written warning to the perpetrator and a copy of it maintained in the Employee's file.
 - d. Change of work assignment / transfer for either the perpetrator or the victim, withholding of promotion.
 - e. Suspension or termination of services of the Employee found guilty of the offence.
 - f. The above-mentioned actions shall be in addition to any legal recourse sought by the Complainant.
6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Company.

The process flow for filing a complaint in accordance with the above-mentioned provisions is enclosed as Annexure-II.

C. Conciliation

Prior to initiating an inquiry, the ICC may, at the request of the Complainant take steps to settle the matter between the Complainant and the harasser through conciliation, provided that no monetary settlement including promotion, bonus, appraisals etc. is made the basis of such conciliation. Resolution through conciliation is to happen within 2 weeks of receipt of complaint, failing which the ICC will initiate a formal inquiry.

In case a settlement has been arrived at, the ICC shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation of the ICC. The ICC will provide copies of the settlement as recorded to the Complainant and the harasser. Upon a conciliation being reached, the ICC would not be required to conduct any further inquiry.

D. Appeals

If an aggrieved party is dissatisfied with the outcome of the investigation conducted by the ICC, the aggrieved party shall have the right to file an appeal with a court or tribunal within 90 (ninety) days of the recommendations provided in the inquiry report by the ICC. The Company will provide assistance to the aggrieved party for the same.

IX. CONFIDENTIALITY:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interest of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process to the extent practicable and appropriate under the circumstances.

X. ACCESS TO REPORTS AND DOCUMENTS:

All records of complaints, including minutes of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XI. PROTECTION TO COMPLAINANT / VICTIM:

The Company is committed to ensuring that no Employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XII. POLICY IMPLEMENTATION AND REVIEW:

- This policy will be implemented and reviewed by the HR Department of the Company.
- All other policies of the Company having a bearing on the implementation of this policy shall be revised accordingly.
- The policy is made available to all Employees to refer
- The constitution of ICC has been displayed at conspicuous places within the Company premises
- The policy is made part of the Corporate Induction Module.

XIII. CONCLUSION:

In conclusion, the Company reiterates its commitment to providing its Employees, a workplace free from harassment/ discrimination and where every Employee is treated with dignity and respect.

Note: This policy was reviewed and revised by the Board of Directors of the Company at its meeting held on 10th October, 2025

Annexure- I

Sexually oriented behavior shall mean and include but not limited to the following:

Material that is sexual in nature, sexist, sexually explicit and so on and is displayed in the workplace, circulated, or put in someone's workspace or belongings, or on a computer or fax machine or on the Internet or any other public display system or public place in the work premises

- Verbal abuse or comments that put down people because of their sex
- Comments about people's (women/men) bodies
- Tales of sexual exploits
- Graphic descriptions of pornography
- Sexually explicit gestures
- Unwelcome touching and hugging
- Sexist jokes and cartoons
- Obscene phone calls / text messages
- Displaying pornography in the workplace
- Insisting that workers wear revealing clothing
- Inappropriate gifts
- Lewd and threatening letters
- Indecent exposure
- Subtle or overt pressure for sexual favours

“Sexual Harassment” should not be confused with simple friendly behaviour or with more intimate exchanges, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is neither solicited nor accepted by the recipient, it is unwelcome and/or imposed.

Annexure- II
Process Flow for Redressal Mechanism

