

KRANTI INDUSTRIES LIMITED

PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (POSH) POLICY

VERSIONS OF POLICY

Sr. No.	Description of Change	Approved by	Approval Date	Effective Date
1	Original Policy	Board of Directors	-	December 21, 2015
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TABLE OF CONTENT

Sr. No	Particulars	Page No
1.	Preface	3
2.	Preamble	3
3.	Applicability	3
4.	Definitions	4
5.	Internal Complaints Committee (ICC)	5
6.	Procedure of filing the Compliant	6
7.	False or malicious compliant and false evidence	9
8.	Confidentiality	9
9.	Non-Retaliation	9
10.	Employer shall ensure	9
11.	Access to Reports and Documents	10
12.	Responsibilities regarding Sexual Harassment	10
13.	Annual Report	10
14.	Amendment	10
15.	Annexure A- Members of Internal Complaints Committee (ICC)	11
16.	Annexure B- Provisions under Bharatiya Nyaya Sanhita (BNS), 2023	11
17.	Annexure C- Complaint Form	12

(Effective from February 12, 2025)

1. Preface:

KRANTI INDUSTRIES LIMITED (the “**Company**”) is committed in ensuring that all persons engaged with the Company, work in an environment that is inclusive and provides an opportunity to bring their best selves at workplace. The Company is committed to provide a safe and congenial work environment that ensures every person at the workplace is treated with dignity, respect and provided equal treatment.

Sexual harassment constitutes infringement of fundamental right of a woman to equality under Article 14 and 15 of the Constitution of India. Further, Article 21 of the Constitution of India guarantees right to life and to live life with dignity which includes right to a safe environment free from Sexual Harassment and with this note and keeping in view the provisions of Sexual Harassment of Woman at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as “**POSH Act**”) and Rules thereunder this Policy on Prevention of Sexual Harassment at Workplace (hereinafter referred to as “**Policy**”) has been formulated.

The Company does not tolerate any form of discrimination, victimization, or harassment including Sexual Harassment and it is committed to take all necessary steps to ensure that nobody is subjected to any kind of harassment.

The said Policy is framed to define the guidelines and process to be followed in order to provide protection against sexual harassment of women at workplace and prevention and redressal of complaints of sexual harassment in addition to the matters connected therewith or incidental thereto. For any doubts or clarifications reference to be made to the POSH Act and the rules thereunder.

2. Preamble

Sexual Harassment is not only a serious misconduct but is also a criminal offence, which can destroy human dignity and freedom. To promote the wellbeing of all female employees at the workplace, this Policy envisages as under,

- a. It shall be the duty of the management to prevent or deter the commission of any act of sexual harassment at the workplace.
- b. Sexual harassment will be considered as major misconduct and action will be taken on the basis of recommendation of Internal Committee and findings of the Inquiry in this context.

3. Applicability

This policy applies to:

- a. All employees (permanent, temporary, contract, part-time, or interns) working in the organization, whether in India or abroad, at any office or place of work.
- b. Any individual associated with the organization, including clients, contractors, visitors, and any other third-party vendors or stakeholders.

- c. Employees and individuals who are present at work-related events, including social events, conferences, seminars, and off-site locations, during working hours or during any event organized by the company.
- d. Any incident of sexual harassment that occurs in the organization's premises, remote locations, or other venues where the organization's business activities are conducted.

4. Definitions

In this Policy unless the context otherwise requires, the words and expressions stated hereunder shall have the following meaning: -

"Aggrieved Woman" means 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;

"Employee" means 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 or called by any other such name;

"Employer" or **"Management"** includes the Managing Director or board or committee responsible for formulation and administration of policies related to prevention of sexual harassment at workplace.

"Internal Complaint Committee (ICC)" means an Internal Complaints Committee constituted in accordance with the Section 4 of POSH Act.

"Respondent" means a person against whom the aggrieved woman has made a complaint under Section 9 the POSH Act.

"Sexual Harassment" includes one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- a. Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - physical contact and advances; or
 - a demand or request for sexual favors; or
 - making sexually coloured remarks; or
 - showing pornography; or
 - any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

It further includes following amongst other circumstances,

- i. **Verbal/Written:** Comments about clothing, personal behavior, or a person's body; sexual or sex-based jokes; requesting sexual favors or repeatedly asking a person out; sexual innuendoes; telling rumors about a person's personal or sexual life; threatening a person, sending emails or text messages of a sexual nature.

- ii. **Physical:** Assault; impeding or blocking movement; inappropriate touching of a person or a person's clothing; kissing, hugging, patting, stroking
 - iii. **Nonverbal:** Looking up and down a person's body; derogatory gestures or facial expressions of a sexual nature; following a person
 - iv. **Visual:** Posters, drawings, pictures, emails or text of a sexual nature
 - v. **QuidProQuo ("This for that"):** A person in a position of authority, typically a supervisor, demands sexual favors as a condition to getting or keeping a job benefit.
- b. The following 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:—
- implied or explicit promise of preferential treatment in her employment; or
 - implied or explicit threat of detrimental treatment in her employment; or
 - implied or explicit threat about the victim's present or future employment status; or
 - interferes with her work or creating an intimidating or offensive or hostile work environment for her; or
 - humiliating treatment likely to affect her health or safety.

"Workplace" would mean and include the following:

- a. Any premises, locations, establishments, offices, branches, or units established, owned, controlled by the Company.
- b. Any external location visited by the Employee arising out of or during employment including any mode of transportation provided by the Employer or use of public transport such as uber/ola etc. for undertaking a journey to and from the aforementioned Locations.

5. Internal Complaints Committee (ICC):

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, an "Internal Complaints Committee" is constituted in accordance with Section 4 of POSH Act and rules thereunder. The detail of the committee is notified to all covered persons at the workplace.

The ICC shall comprise of the following, namely;

- Presiding Officer: A woman employed at a senior level in the organization or workplace.
- At least 2 members from amongst employees, committed to the cause of women or who had experience in social work or having legal knowledge.
- one 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:
- At least one half of the total members so nominated shall be women.

Every member of the committee shall hold the office for the period of three years from the date of nomination.

Current nominated members of the ICC are given in **Annexure A**.

The ICC is responsible for:

- Receiving complaints of sexual harassment at the workplace
- Initiating and conducting inquiry as per the established procedure
- Submitting findings and recommendations of inquiries
- Coordinating with the employer in implementing appropriate action
- Maintaining strict confidentiality throughout the process as per established guidelines
- Submitting Annual Reports in the prescribed format.

6. Procedure of filing the Complaint:

A. Lodging of Complaint:

- a. An aggrieved women can make, in writing, a complaint of Sexual Harassment to the ICC, within a period of 3 (Three) months from the date of incident and in case of a series of incidents, within a period of 3 (Three) months from the date of last incident. The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding 3 (Three) months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a complaint within the said period.
- b. Where the Aggrieved Woman is unable to file the 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 aggrieved woman;
- c. Where the Aggrieved Woman is unable to file the 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 the knowledge of the incident jointly with the relative or a friend or a special educator or a qualified psychiatrist or the psychologist or the guardian or the authority under whose care she is receiving treatment or care;
- d. Where an Aggrieved Women, 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;
- e. Where the Aggrieved Women is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of her legal heir.
- f. This Complaint by aggrieved female employee shall be made to ICC in writing and be sent either by post or email or given in person to the ICC of the establishment or any officer authorized by ICC in writing.

- g. The form in which the complaint is required to be made is annexed as **Annexure C** to the Policy. However, any written complaint received in any form other than the form prescribed in **Annexure C** shall also be accepted. The complaint can be submitted to the ICC electronically at shiladhawale@krantiindustries.com or at the contact details provided in the attached table or may be physically submitted to any ICC member. The ICC will not accept oral complaints under this Policy unless it is reduced in writing.

B. Inquiry:

- a. The complainant/aggrieved women shall submit 6 (Six) copies of the complaint along with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses.
- b. On receipt of the complaint, the ICC shall send one of the copies received from the aggrieved women to the Respondent within a period of 7 (Seven) working days.
- c. The Respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding 10 (Ten) working days from the date of receipt of the documents.
- d. The ICC shall make an inquiry into the complaint in accordance with the principles of natural justice. The ICC must notify in writing, the time and dates of its meetings to the Complainant and the Respondent.
- e. The ICC have the right to terminate the inquiry proceedings or to give an *ex-parte* decision on the complaint, if the complainant or Respondent fails, without sufficient cause, to prevent herself or himself for 3 (Three) consecutive hearing convened by the Presiding Officer.
Provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 (Fifteen) days in advance, to the party concerned.
- f. The aggrieved women and the Respondent 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.
- g. While conducting the inquiry, a minimum of 3 (Three) members of the ICC including the Presiding Officer shall be present.
- h. During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC.
- i. The inquiry shall be completed within a period of 90 (Ninety) days from the date of receipt of the complaint.

C. Action during Pendency of Inquiry:

- a. During the pendency of an inquiry on a written request made by the Complainant, the ICC may recommend to the employer to—

- i. Restraint the respondent from reporting on the work performance of the Aggrieved Woman or writing her confidential report and assign the same to another officer; or
 - ii. Grant such other relief to the aggrieved woman as may be prescribed under the applicable law.
- b. On the recommendation of the ICC, the employer shall implement the recommendations made and send the report of such implementation to the ICC.

D. Inquiry Report and Actions:

- a. On the completion of an inquiry the ICC shall provide a written report of its findings to the Employer within a period of 10 (Ten) days from the date of completion of the inquiry and such report be made available to the concerned parties.
- b. In the event that the ICC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Employer that no action is required to be taken in the matter.
- c. Where the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend in writing to the Employer to take action against the Respondent, which may include:
 - Written formal apology from the Respondent
 - Letter of warning may be placed in the personal file of the Respondent
 - Reprimand or censure
 - Withholding of promotion
 - Withholding of pay rise or increments
 - Immediate transfer or suspension without pay
 - Termination from service
 - Withholding of pay rise or increments
 - Undergoing a counselling session
 - Carrying out community service
 - Register FIR against the Respondent in case the act alleged, prima facie constitutes an offense under the Indian Penal Code
 - Deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Women or to her legal heirs.

If the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman.

- d. The Employer shall act upon the recommendation given by ICC within 60 (Sixty) days of receipt of the recommendation and confirm to the committee.

E. Appeal:

In the event Complainant / Respondent is aggrieved from the recommendations made by the ICC or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by the law, within a period of 90 (Ninety) days of the recommendations.

7. False or malicious complaint and false evidence:

- a. False or malicious accusations of Sexual Harassment can have serious or disturbing effect on innocent Employees.
- b. All Complaints made of Sexual Harassment should be factual and true. If after investigation it becomes clear that the Aggrieved Woman or any other person making such Complaint, made false accusation (including producing forged or misleading document) against the Respondent, the so-called Aggrieved Woman or any other person making the Complaint would become liable for appropriate disciplinary action.
- c. A mere failure to substantiate a Complaint or provide an adequate proof shall not attract action against the Aggrieved women.
- d. The malicious intent on the part of the aggrieved women shall be established after an inquiry in accordance with the procedure prescribed by the Committee before any disciplinary action is recommended.
- e. Where the ICC arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness to take action in accordance with the provisions of the service rules applicable to the said witness or where no such service rules exist, in such manner as may be prescribed.

8. Confidentiality:

This policy and the law prohibit any person from publishing, communicating, or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the Aggrieved Woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the Internal Complaints Committee. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

9. Non-Retaliation:

The company will not accept, support or tolerate retaliation in any form against any employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action.

- Retaliation will be treated as a major misconduct.
- Retaliation against those reporting sexual harassment is prohibited by this policy.
- Retaliation means and includes any hurtful employment action against an individual/s.
- Anyone suspecting or experiencing retaliation should report to the appropriate authorities.
- Retaliation cases are treated as serious as an alleged case of sexual harassment even if the original harassment complaint is not proven.

10. Employer shall ensure:

- a. That in case of complaint against any of the members of the ICC, the Employer shall reconstitute the committee after making due investigation of the complaint. In all such case the guidelines stated hereinabove would be inclusive of the time taken to reconstitute the committee.

- b. The Employer shall provide assistance to the complainant, if the Complainant chooses to file a complaint in relation to the offence under the Bhartiya Nyaya Sanhita (“BNS”) (Refer **Annexure B** regarding Punishment for Sexual Harassment under the BNS) or any other law for the time being in force.
- c. The Employer shall also initiate action under the Bhartiya Nyaya Sanhita or under other law for the time being in force, against the respondent, where the respondent is not an employee of the establishment and there is a complaint of sexual harassment against the respondent in the workplace where the harassment took place.
- d. The Employer shall direct the HR/Administration department to ensure display at the conspicuous place the guideline as given in Section 19 (b) of the POSH Act.
- e. The Employer shall direct and monitor the HR/Administration department to create awareness amongst the employee on Prevention of sexual harassment policy and the procedure through following amongst other means:
 - Training cum Awareness session for employees (men and women)
 - Training cum Awareness session for ICC members
 - Training cum Awareness session for HR team and Senior Managers
- f. The Employer will assist in ensuring the attendance of the Respondent and Witnesses before the ICC as the case may be.

11. Access to Reports and Documents:

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

12. Responsibilities regarding Sexual Harassment:

All employees of the Company have a personal responsibility to ensure that Individual behavior is not contrary to this policy and ensure an environment free from sexual harassment.

13. Annual Report:

The ICC shall submit Annual Report to the Employer outlined in the POSH Act in such form as may be prescribed in the rules made thereunder.

14. Amendment:

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

ANNEXURE A

MEMBERS OF INTERNAL COMPLAINTS COMMITTEE (ICC)

Sr. No.	Name of Employee	Designation	Designation at Committee	Contact Details
1.	Mrs. Sheela Kailas Dhawale	Chief Financial Officer	Presiding Officer	9552561015
2.	Ms. Pramila Nehe	Senior Executive - Customer Correspondence	Committee Member	8975996680
3.	Adv. Anuja M. Terkar	Associate Advocate – DMC, Pune	NGO Member	9822190208
4.	Ms. Shraddha N Phule	Company Secretary & Compliance Officer	Committee Member	7028271015
5.	Mr. Rameshwar Kale	Team Leader	Committee Member	9850392913
6.	Mr. Pravin Patil	Team Leader	Committee Member	9011445508
7.	Mr. Dnyandev Bhuvad	Senior Officer- HR	Committee Member	9881121243

ANNEXURE B

Provisions of the Bharatiya Nyaya Sanhita (BNS), 2023 –

Sexual Harassment and Punishment for Sexual Harassment

Under the *Bharatiya Nyaya Sanhita, 2023*, the newly introduced Section 75 (corresponding to Section 354A of the Indian Penal Code) 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**.

- a. A man committing any of the following acts:
- i. physical contact and advances involving unwelcome and explicit sexual overtures; or
 - ii. a demand or request for sexual favours; or
 - iii. showing pornography against the will of a woman; or
 - iv. making sexually coloured remarks,
- shall be guilty of the offence of sexual harassment.
- b. Any man who commits the offence specified in clause (i) or clause (ii) or clause (iii) above, shall be punished with rigorous imprisonment for a term which may extend to 3 (Three) years, or with fine or with both.
- c. Any man who commits the offence specified in clause (iv) above shall be punished with imprisonment of either description for a term which may extend to 1 (One) year, or with fine, or with both.

ANNEXURE C
COMPLAINT FORM

1. Details of Aggrieved Woman:

Name	Designation	Division & Department	Contact Numbers	Office Address

2. Details of Complainant (in case the Complainant is not the Aggrieved Individual)

Name	Relationship with Aggrieved Individual	Contact Numbers	Address

3. Details of individual alleged to have engaged in Sexual harassment

Name	Designation	Division & Department	Contact Numbers	Office Address

4. Details of the incident(s)

Sr. No.	Nature / Description of incident	Date of incident	Time of incident	Place of incident	Name and contact details of witnesses if any

5. Has a report regarding these incidents been filed with any other agency?

YES () NO ()

If yes, with whom?

6. Additional information and comments if any:

Signature of Aggrieved Woman:
Date:

Signature of Complainant:
Date: