

RISHIROOP LIMITED

THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) POLICY

Preamble:

Rishiroop Limited ("Company") is committed to providing a safe, secure, respectful and inclusive work environment free from sexual harassment, discrimination, intimidation and retaliation.

The Company believes that every employee has the right to be treated with dignity and respect and is committed to promoting a workplace where all individuals can work without fear of harassment or abuse.

This Policy has been formulated in accordance with:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act");
- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("Rules");

Highlights of the statutory provisions are reproduced in the Company's Policy for ready reference. The POSH Act and the Rules may be referred to for strict compliance of the various provisions.

Purpose & Objective:

To provide protection against sexual harassment of women at workplace and for prevention and redressal of Sexual harassment complaints.

The objective in implementing and enforcing this policy is to define workplace sexual harassment, prohibit it in all forms, carry out appropriate disciplinary measures in the case of violations, and provide procedures for lodging complaints about conduct that violates this policy and investigating sexual harassment claims.

Scope:

This policy applies to all employees of the Company and those working for the company at all locations including trainees, apprentices, consultants, retainers, interns, contract workers and other persons covered under the POSH Act. All workers, including

supervisors and managers, will be subject to discipline, up to and including discharge, for any act of sexual harassment they commit.

Definitions: What amounts to sexual harassment?

Sexual harassment includes any one or more of the following unwelcome acts of behavior, viz:

- i. physical contact and advances; or
- ii. a demand or request for sexual favours; or
- iii. making sexually coloured remarks; or
- iv. showing pornography; or
- v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

The following circumstances, may also amount to sexual harassment –

- i. implied or explicit promise of preferential treatment in her employment; or
- ii. implied or explicit threat of detrimental treatment in her employment; or
- iii. implied or explicit threat about her present or future employment status; or
- iv. interference with her work or creating an intimidating or offensive or hostile work environment for her; or
- vi. humiliating treatment likely to affect her health or safety.

Constitution of Internal Complaints Committee (ICC):

Rishiroop Company shall constitute a Committee to be known as the Internal Complaints Committee (“ICC”) comprising of at least four members and 50% of the members should be women.

The ICC shall consist of the following members:

- i. A presiding officer who shall be a women employed at a senior level at the workplace from amongst the employees
- ii. Not less than 2 members from amongst employees preferably committed to the cause of women or who have had experience in social work or legal knowledge
- iii. 1 member from amongst non-governmental organizations and associations committed to the cause of women or a person familiar with the issues relating to sexual harassment

Complaint Resolution Procedures:

1. Any aggrieved women employee make in writing a complaint of sexual harassment at workplace to the internal committee within a period of 3 months from the date of incident. Complaint form as per **Annexure-I** can be used. Complaints can be sent through email on email id - complaints@rishiroop.com. Access to this email id should be given to all the ICC Committee members and the concerned Nodal Officer. The Internal Committee may extend the time limit for filing complaints by a further period of 3 months, if sufficient cause is shown.
2. Internal committee to send one copy of the complaint and related documents to the respondent within 7 working days of receipt of complaint.
3. Respondent to file his reply to ICC along with supporting documents and names and addresses of the witnesses within 10 working days from the date of receipt of documents from Internal committee
4. ICC to make inquiry in accordance with Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules 2013. Inquiry is to be completed within 90 days. The internal committee may before initiating an inquiry and at the request of the aggrieved employees take steps to settle the matter between her and the respondent through conciliation.
5. While conducting inquiry, a minimum of 2 members of Internal Committee including the presiding officer should be present.
6. During the inquiry period, the ICC may recommend - transfer of the complainant/respondent, mandatory leave or other appropriate relief.
7. On completion of inquiry the internal committee shall provide a report of its findings to the Company within a period of 10 days from the date of completion of inquiry and such reports shall be made available to the concerned parties

Individuals should report complaints of conduct believed to violate Company's sexual harassment policy according to the policy's complaint procedures may be sent by e-mail addressed to complaints@rishiroop.com, as per **Annexure I**

Action in the matter:

- Where the Internal Committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.
- Where the internal Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to take action for sexual harassment as misconduct in accordance with the Company Rules applicable to the respondent.
- Action on the recommendations of internal committee would be taken within 60 days of the receipt of recommendations.

Appeal:

Any person aggrieved by the recommendations of the ICC may prefer an appeal within a period of 90 days to Competent Authority or Court.

False Accusations:

If the internal Complaint Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the internal Compliant Committee may recommend disciplinary action to be taken against the person.

It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. Committee recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

Discipline:

Employees who violate this policy are subject to appropriate discipline. If an investigation results in a finding that this policy has been violated, the mandatory minimum discipline is a written reprimand. The discipline for very serious or repeat violations is termination of employment. Persons who violate this policy may also be subject to civil damages or criminal penalties.

Confidentiality:

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. Information contained in a formal complaint is kept as confidential as possible. Specifically, publication or disclosure of any information related to the complaint is prohibited in respect of:

- Identity of complainant
- Identity of respondent
- Witness details
- Contents of complaint
- Inquiry proceedings
- Recommendations
- Action taken

However, the identity of the complainant may be revealed to the respondent and witnesses for the purpose of inquiry.

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 the 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.

Committee to submit annual report:

The Internal Committee shall in each calendar year prepare an annual report and submit the same to Competent Authority. The Company shall include in its report the number of cases filed, if any, and their disposal under this Act in the annual report of the organization.

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.

Review and Amendment:

The Board shall have the power to amend and update any of the provisions of this policy, substitute any of the provisions with a new provision or replace this policy entirely with a new policy in order to adhere to the amendments issued by the regulatory authorities from time to time.

Last updated on: August 7, 2026

ANNEXURE I

Sub: Complaint related to sexual harassment of women at workplace

1.	Name of the affected women employee	
2.	Designation	
3.	Phone No.	
4.	Date & time of occurrence	
5.	Exact nature of incident, occurrence	
6.	Name of the offender	
7.	Designation	
8.	Other details (in case of unknown offender/ Stranger, etc.)	
9.	Name and signature of witness if any	
Date		(Signature of the employee)
		Name: Designation: Contact number: