SHREM INVESTMENTS PRIVATE LIMITED

POLICY ON SEXUAL HARASSMENT

Approved By	Board of Directors
Effective Date	April 4, 2026
Version	1.0

POLICY ON SEXUAL HARASSMENT

A. PREAMBLE

Shrem Investments Private Limited ("Company") is committed to providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. 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.

B. PURPOSE

To create and maintain safe work environment, free form sexual harassment & discrimination for all its employees. As per the guidelines of "The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.

C. APPLICABILTY

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites.

The policy also extends to those who are not employees of the Company, such as customers, visitors, vendors, suppliers, contract worker, or called by any other such name, but are subjected to sexual harassment at the Premises of the Company.

Since the Company presently has less than ten (10) employees/workers, the Company is not required to constitute an Internal Complaints Committee under Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Complaints of sexual harassment may be made to the Local Committee constituted by the District Officer under Section 6 of the said Act.

D. DEFINITIONS

- **Sexual harassment** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely-
- physical contact and advances;
- unwelcome communications or invitations;
- demand or request for sexual Favours;
- sexually cultured remarks;
- showing pornography;
- creating a hostile work environment and
- any other unwelcome "sexually determined behavior" (physical, verbal or non-verbal conduct) of a sexual nature.

- **Aggrieved Woman** means-

  (i) 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;
  (ii) in relation to a dwelling place or house, a woman of any age who is employed in such a dwelling place or house.

- **"Respondent"** means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman.

- **"Complainant**" means any aggrieved woman who makes a complaint alleging sexual harassment under this policy.

- **"Employee"** means a person employed at the 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

- **"Workplace"** means shall include Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company and Places visited by the Employee arising out of or during the course of employment including official events, accommodation and transportation provided by the employer for undertaking a journey.

- **"Employer**" means a person responsible for management, supervision and control of the workplace.

- **"Local Committee"** means the Local Committee constituted by the District Officer under Section 6 of the Act for receiving and dealing with complaints of sexual harassment from establishments where the Internal Complaints Committee has not been constituted because the establishment has less than ten workers.

- **"Act"** means "The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013" and any amendment thereto.

E. COMPLAINT MECHANISM:

Since the Company presently has less than ten employees/workers, an Internal Complaints Committee is not required to be constituted by the Company.

Accordingly, an appropriate complaint mechanism is available through the Local Committee constituted by the District Officer under the Act for time-bound redressal of complaints made by the Aggrieved Woman.

The Company shall provide reasonable assistance to the Aggrieved Woman for making a complaint before the Local Committee and shall cooperate with the Local Committee in the inquiry and proceedings relating to any complaint.

F. LOCAL COMMITTEE

As the number of employees/workers of the Company is less than ten, complaints relating to sexual harassment may be made to the Local Committee constituted by the District Officer under Section 6 of the Act.

The Local Committee shall deal with the complaint and conduct the inquiry in accordance with the provisions of the Act.

The Company shall provide such assistance, information and facilities as may be required by the Local Committee for dealing with any complaint relating to the Company.

The Company shall maintain and communicate the contact details of the concerned Local Committee/District Officer to its employees, as applicable.

G. FUNCTIONING OF COMMITTEE:

1. Lodging a Complaint:

a) The Aggrieved Woman may make a complaint to the Local Committee in accordance with the provisions of the Act, ordinarily within a period of three months from the date of incident or, in case of a series of incidents, within three months from the date of the last incident.

b) Where an Aggrieved Woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by the persons permitted under the Act.

c) Where an Aggrieved Woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by the persons permitted under the Act.

d) Where an Aggrieved Woman, for any other reason, is unable to make a complaint, a complaint may be filed by a person in accordance with the provisions of the Act.

e) The Local Committee may, for the reasons to be recorded in writing, extend the time limit in accordance with the provisions of the Act, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Woman from filing a complaint within the prescribed period.

f) The Company shall provide reasonable assistance to the Aggrieved Woman in making the complaint before the Local Committee.

B. Conciliation:

The Local Committee may, before initiating an inquiry, at the request of the complainant take steps to settle the matter between her and the Respondent through conciliation. However, no monetary settlement shall be made the basis of the conciliation.

Where a settlement has been arrived at as mentioned above, the Local Committee shall record the settlement and deal with the matter in accordance with the provisions of the Act.

C. Inquiry into Complaint:

The Local Committee shall proceed to make inquiry into the complaint in accordance with the provisions of the Act and the rules made thereunder.

Such inquiry shall be conducted in accordance with the principles of natural justice and shall provide an opportunity of being heard to the complainant and the Respondent and the relevant witnesses provided by the complainant and the Respondent.

The Company shall provide necessary assistance and cooperation to the Local Committee during the inquiry.

D. Inquiry Report:

On the completion of such inquiry, the Local Committee shall provide the report of its findings and recommendations in accordance with the provisions of the Act.

The Company shall act upon the recommendations of the Local Committee within the period prescribed under the Act.

H. 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.

I. DISCIPLINARY ACTIONS:

The disciplinary actions which may be recommended by the Local Committee can range from a warning letter to termination, depending upon the nature and gravity of the misconduct. Once the recommendations are made, the Employer shall implement the disciplinary action in accordance with the provisions of the Act and applicable service rules.

J. PUNISHMENT FOR FALSE COMPLAINTS:

Where the Local Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is either malicious or false, or that false evidence or misleading documents have been produced, appropriate action may be taken by the Management in accordance with the provisions of the Act. Provided that a mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant**.**

K. SANCTIONS AND DISCIPLINARY MEASURES:

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages/ Salary
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

L. RIGHT TO APPEAL:

If the Aggrieved Person or the Respondent is dissatisfied with the actions taken pursuant to the proceedings under the Act, they can file an appeal in accordance with the provisions of the Act and applicable law.

M. CONFIDENTIALITY:

Notwithstanding anything contained in the Right to Information Act, 2005, contents of the complaint, the identity and addresses of the Aggrieved Woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Local Committee and the action taken by them shall not be published, communicated, or made known to the public, press and proceedings media in any manner, except as permitted or required under applicable law.

N. REVIEW AND AMENDMENT OF POLICY

This Policy shall be reviewed annually or as required. The Board reserves the right to amend or modify this Policy as and when required

O. DISCLOSURE IN COMPANY'S BOARD REPORT:

The Company shall furnish the information pertaining to the number of cases filed and disposed of in its Board Report.

Adopted by the board of directors of Shrem Investments Private Limited on **April 04, 2026**.

For Shrem Investments Private Limited

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Nitan Chhatwal
Director
DIN: 00115575