

POLICY ON SEXUAL HARASSMENT

A. PREAMBLE

Shrem Infra Invest 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 from 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. APPLICABILITY

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.

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.
- **“Internal Complaints Committee”** means a committee by that name, constituted by the Board as per the provisions of the Act.
- **“Act”** means “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and any amendment thereto.

E. COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of “Complaints Committee” has been created in the Company for time-bound redressal of the complaint made by the victim.

F. COMPOSITION OF THE COMMITTEE:

To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (IC) have been appointed for all administrative units / offices of the company, the Complaints Committee will comprise of the following members:

- i) A Presiding Officer who shall be a woman employed at a senior level at the workplace from amongst the employees: 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
- ii) not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have the legal knowledge.
- iii) one member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment:
- iv) at least one-half of the total Members so nominated shall be women.

The Internal Complaints Committee will operate on the following guidelines: -

- a) The Aggrieved Woman Complaints Committee shall meet as and when any instance of violation of the policy is referred to the committee and, in any case, at least once in a year.
- b) Internal Complaints Committee shall prepare the annual report and submit the report pertaining to number of cases filed and their disposal under the Act to the Senior person of the organization.
- c) The Presiding Officer and the members of the Internal Complaints Committee will hold the position up to three years from the date of their nomination.

G. FUNCTIONING OF COMMITTEE:

1. Lodging a Complaint:

- a) The Aggrieved Woman makes a complaint directly to the Presiding Officer of the Internal Complaints Committee. The Presiding Officer should try & solve the grievance informally before escalating the matter to the formal Committee within a period of three months from the date of incident.
- b) Where an Aggrieved Woman 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, (iii) an officer of the National or State Commission for Women, or (iv) any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- c) Where an Aggrieved Women 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, (iv) the guardian, or (v) any person who has knowledge of the incident jointly with any of the persons mentioned in (i) to (v) of this paragraph.

- 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 the written consent of the Aggrieved Women.
- e) The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Woman from filing a complaint within the said period. Such complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name of the contravener. The information disclosed by such complainant should be treated as confidential information by the members of the Internal Committee.
- f) If the Aggrieved Woman would like to initiate action under the Indian Penal Code, 1860 ("IPC"), she may inform the management, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the IPC.

B. Conciliation:

The Internal Complaints 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 Internal Complaints Committee shall record the settlement so arrived at and forward the same to the management to take action as specified in the recommendation and shall provide copies of the settlement to the complainant and the Respondent.

C. Inquiry into Complaint:

The Internal Complaints Committee shall proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable. Such an inquiry (with due conciliation as appropriate) shall be completed within a period of three months. Confidentiality of the complaint procedure will be maintained. The Internal Complaints Committee shall proceed to make an inquiry into the complaint in accordance with the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to the complainant and the Respondent and the relevant witnesses provided by the complainant and the Respondent.

D. Inquiry Report:

On the completion of such inquiry, the internal committee shall provide the report of its findings to the Chairman within a period of 10 days from the date of completion of enquiry and such report be made available to the concerned parties. The Managing Director & CEO shall act upon the recommendation within 60 days of its receipt. In the event that the Internal

Complaints Committee arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the Internal Complaints Committee, and it shall notify the management of the same.

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 Internal Committee which can range from a warning letter to termination. Once the recommendations are made, the Employer shall implement the disciplinary action. All investigations which lead to a decision of termination of employment are reviewed and approved by the Compliance Committee as part of the completion of the inquiry process.

J. PUNISHMENT FOR FALSE COMPLAINTS:

Where the Internal Complaints Committee arrives at a conclusion during or after the inquiry that the allegation against the Respondent is either malicious or false, appropriate punitive action may be taken by the Management as per service rules applicable on recommendations of the committee.

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 by the Committee for the resolution of a complaint, they can file an appeal to the local authorities in accordance with applicable local 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 Internal Complaints 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.

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 Infra Invest Private Limited on **April 04, 2026**.

For Shrem Infra Invest Private Limited

Nitan Chhatwal
Director
DIN: 00115575