

CHIRAHARIT LIMITED

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Policy on Prevention of Sexual Harassment at Workplace (POSH)

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1. Introduction:

This Prevention of Sexual Harassment Policy ("Policy") has been framed in accordance with the provisions of **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the rules made thereunder (hereinafter collectively referred to as the "Act"). The Policy is intended to give effect to the provisions of the Act and sets out the Company's framework for the prevention, prohibition and redressal of sexual harassment at the workplace.

In the event of any inconsistency or ambiguity between the provisions of this Policy and those of the Act or the rules made thereunder, the provisions of the Act and the applicable rules, as amended from time to time, shall prevail.

2. Objective:

The objective of this Policy is to create and maintain a safe, secure and respectful work environment that is free from sexual harassment and intimidation. The Policy has been framed in accordance with the provisions of **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the rules made thereunder.

The Company is committed to ensuring that every employee is treated with dignity, respect and fairness and is provided with equal opportunity for professional growth and development. The Company adopts a zero-tolerance approach towards sexual harassment and shall take all reasonable and necessary measures to prevent, prohibit and redress sexual harassment at the workplace in accordance with the provisions of the Act.

3. Scope:

This Policy applies to all employees of the Company, including permanent, temporary and contractual employees, workmen, trainees, interns and any other person engaged by the Company, whether working at the Company's premises or at client sites. The Company adopts a zero-tolerance approach to sexual harassment, including acts involving clients, vendors, consultants, suppliers, visitors and other business associates.

For the purposes of this Policy, the **workplace** includes:

- (i) All offices, branches and other premises where the Company's business is carried on.
- (ii) Any location where Company-related activities are undertaken, whether within or outside the Company's premises.
- (iii) Any place visited by an employee arising out of or during the course of employment, including transportation provided by the Company for such travel.

4. Definition of Sexual Harassment:

In accordance with the provisions of **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, "sexual harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), namely:

- Physical contact and advances;
- A demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

Sexual harassment is any unwelcome conduct of a sexual nature that violates the dignity of an individual or creates an intimidating, hostile, humiliating or offensive work environment. Such conduct may be physical, verbal, non-verbal or written, and a single incident may constitute sexual harassment.

The following are illustrative examples of conduct that may amount to sexual harassment:

- Unwelcome touching, patting, grabbing, brushing against or any other inappropriate physical contact.
- Repeated or unwelcome requests for dates, personal meetings or sexual favours.
- Sexually coloured remarks, comments, jokes, innuendoes or offensive language.
- Staring, leering, suggestive gestures or other unwelcome non-verbal conduct of a sexual nature.
- Displaying, circulating or transmitting sexually explicit, suggestive or offensive photographs, videos, messages, emails, posters or other material in any form, including through electronic or social media.
- Sending unwelcome letters, messages, gifts or other communications of a sexual nature.
- Making unwelcome comments regarding a person's appearance or body.
- Implied or explicit promises of preferential treatment, or threats of adverse employment consequences, in exchange for sexual favours.
- Any other unwelcome conduct of a sexual nature that has the purpose or effect of creating an intimidating, hostile, degrading, humiliating or offensive work environment.

The examples set out above are illustrative and not exhaustive, and each complaint shall be examined on its own facts and circumstances in accordance with the provisions of the Act.

5. Internal Complaints Committee (Internal Committee):

The Company has constituted an Internal Committee in accordance with the provisions of Section 4 of the Act to receive, inquire into and redress complaints of sexual harassment and to ensure their timely disposal.

The reconstitution of the Internal Committee has been approved by the Board of Directors at its meeting held on 15th July, 2026.

The Board may reconstitute the Internal Committee from time to time in accordance with the Act and that any change in its composition shall be deemed to form part of the Policy without requiring a formal amendment to this Policy.

6. Complaint, Conciliation and Inquiry Procedure:

- a) Any aggrieved woman who alleges that she has been subjected to sexual harassment at the workplace may submit a written complaint to the Internal Committee within **three (3) months** from the date of the incident or, in the case of a series of incidents, within three (3) months from the date of the last incident. The Internal Committee may, for reasons to be recorded in writing, extend the time limit by a further period of **three (3) months**, if it is satisfied that circumstances prevented the complainant from filing the complaint within the prescribed period.
- b) The complaint shall, wherever applicable, be submitted in six copies together with supporting documents and the names and addresses of witnesses. Where the complaint cannot be made in writing, the Internal Committee shall provide all reasonable assistance to the aggrieved woman in reducing the complaint into writing.
- c) Where the aggrieved woman is unable to make the complaint on account of physical or mental incapacity or death, the complaint may be made by her legal heir or such other person as permitted under the provisions of the Act and the Rules.
- d) Within **seven (7) working days** of receipt of the complaint, the Internal Committee shall forward a copy of the complaint to the respondent, who shall submit a written response, together with supporting documents and the names and addresses of witnesses, if any, within **ten (10) working days**.
- e) At the written request of the aggrieved woman, the Internal Committee may, before initiating an inquiry, take steps to settle the matter through conciliation. Monetary settlement shall not be made the basis of conciliation. Where a settlement is arrived at, the Internal Committee shall record the settlement and forward the same to the Employer for necessary action. No further inquiry shall be conducted unless the terms of settlement are breached.
- f) Where conciliation is not requested or no settlement is arrived at, the Internal Committee shall conduct an inquiry in accordance with the provisions of the Act, the Rules made thereunder and the applicable service rules of the Company.
- g) During the inquiry, both the complainant and the respondent shall be afforded a fair and reasonable opportunity to present their respective cases, submit documentary or other evidence and produce witnesses, if any. The inquiry shall be conducted in accordance with the principles of natural justice.
- h) The Internal Committee may call for such documents, information or witnesses as it considers necessary for the fair and expeditious disposal of the complaint.

- i) The inquiry shall be completed within **ninety (90) days** from the date of receipt of the complaint.
- j) Within **ten (10) days** of completion of the inquiry, the Internal Committee shall submit its findings and recommendations to the Employer and simultaneously provide copies of the report to the complainant and the respondent.
- k) Where the allegation of sexual harassment is proved, the Internal Committee shall recommend appropriate action against the respondent in accordance with the provisions of the Act and the applicable service rules, including recommending disciplinary action and/or payment of compensation to the aggrieved woman, wherever considered appropriate under the Act.
- l) Where the Internal Committee concludes that the complaint was malicious or that false evidence was knowingly produced, it may recommend appropriate action in accordance with the provisions of the Act. However, the mere inability to substantiate a complaint or provide adequate evidence shall not attract any action against the complainant.
- m) The Employer shall act upon the recommendations of the Internal Committee within the time prescribed under the Act.
- n) Any person aggrieved by the recommendations of the Internal Committee or by the action taken by the Employer may prefer an appeal before the appropriate appellate authority in accordance with Section 18 of the Act.
- o) The Internal Committee shall maintain strict confidentiality in respect of the complaint, the identity of the parties, witnesses, inquiry proceedings, recommendations and all related records in accordance with the provisions of the Act.

7. Reporting as per the Section 22 of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

The Internal Committee shall prepare and submit its Annual Report in accordance with the provisions of the Act and the Rules made thereunder. The Employer shall make such disclosures in its Annual Report as may be required under the applicable provisions of the Act.

The Annual Report shall, inter alia, contain the following particulars:

- Number of complaints of sexual harassment received during the financial year;
- Number of complaints disposed of during the financial year;
- Number of cases pending for more than ninety (90) days;
- Number of workshops or awareness programmes conducted for sensitising employees on sexual harassment; and
- Nature of action taken by the Employer.

8. Reporting under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015:

In accordance with the applicable provisions of the **SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**, the following disclosures shall be made in the **Corporate Governance Report** forming part of the Annual Report:

- Number of complaints of sexual harassment filed during the financial year;
- Number of complaints disposed of during the financial year; and
- Number of complaints pending as at the end of the financial year.

9. Miscellaneous:

- a) The Internal Committee may recommend to the Employer such interim or disciplinary measures as may be considered appropriate in accordance with the provisions of the Act and the applicable service rules of the Company.
- b) The Company shall provide all necessary facilities and assistance to the Internal Committee to ensure the effective implementation of this Policy and the timely disposal of complaints.
- c) Where an incident of sexual harassment involves a third party, visitor, vendor, consultant, customer or any other person not employed by the Company, the Company shall take all reasonable steps to assist the aggrieved woman and take appropriate preventive or remedial measures in accordance with the provisions of the Act.
- d) Where the Internal Committee is of the opinion that the conduct complained of also constitutes an offence under the applicable criminal law, it may recommend that the Employer facilitate the filing of a complaint with the appropriate law enforcement authority, in accordance with the provisions of the Act.

10. Confidentiality:

The Company recognises the sensitivity of complaints relating to sexual harassment and is committed to maintaining strict confidentiality throughout the complaint, conciliation and inquiry process.

In accordance with the provisions of the Act, the contents of the complaint, the identity and addresses of the aggrieved woman, the respondent and witnesses, information relating to conciliation and inquiry proceedings, the recommendations of the Internal Committee and the action taken by the Employer shall be kept confidential and shall not be published, communicated or disclosed to the public, press or media, except where such disclosure is required under the provisions of the Act or any other applicable law.

11. Protection against Retaliation:

The Company prohibits any form of retaliation, victimisation or adverse action against any person for making a complaint in good faith, participating in an inquiry or assisting the Internal Committee. Any act of retaliation shall be treated as misconduct and dealt with in accordance with the applicable service rules.

12. Access to Reports and Documents:

All records relating to complaints, inquiry proceedings, evidence, recommendations and other relevant documents shall be maintained securely by the Company and shall be accessible only to authorised persons, except where disclosure is required under the provisions of the Act or any other applicable law.

13. Amendment to the Policy:

The Board of Directors may amend, modify or revise this Policy from time to time, either suo motu or on the recommendation of the Internal Committee, to ensure compliance with applicable laws and to incorporate any statutory amendments, notifications, circulars, guidelines or directions issued by the competent authorities.

In the event of any inconsistency between this Policy and the provisions of the applicable law, including **The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**, the Rules made thereunder, the Companies Act, 2013, the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 or any statutory modification or re-enactment thereof, the provisions of such applicable law shall prevail and this Policy shall be deemed to have been amended to the extent of such inconsistency.