SAHANARATNABH LIMITED

(Formerly known as SAHANARATNABH PRIVATE LIMITED)

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POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH POLICY)

Document Summary

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Revision	Any revisions or modifications to this policy are to be formulated by the Chief Compliance Officer/Company Secretary and submitted to the Board for approval.

SAHANARATNABH LIMITED

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POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH POLICY)

I. OBJECTIVE

Sahanaratnabh Limited ("the Company") is committed to create a secure work environment where all its stake holders such as Employees, Agents, Vendors and Partners can work and pursue business in an atmosphere free from any sexual harassment, exploitation and intimidation.

The Company values each and every employee working with them and is committed to protect their dignity and self-respect. Further, the Company is determined to maintain personal dignity; promote a working environment where both genders complement each other as equals and to strive for maximum productivity.

The objective of this policy is to provide protection against Sexual Harassment of women at workplace.

II. SCOPE

The Policy on "Prevention of Sexual Harassment" (POSH Policy) covers every "employee" at Sahanaratnabh Limited.

Sexual Harassment shall be irrespective of sex, between same sex or opposite sex. Sexual Harassment is judged by the impact on the complainant and not the intent of the Respondent.

III. DEFINITION

a) "**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 dwelling place or house, a woman of any age who is employed in such a dwelling place or house;

b) "**Company**" means "Sahanaratnabh Limited";

c) "**Employee**" means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wages 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 whether the terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

d) "**Employer**"means-

(i) in relation to any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the appropriate Government or a local authority, the head of that department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit or such other officer as the appropriate Government or the local authority, as the case may be, may by an order specify in this behalf;

(ii) in any workplace not covered under sub-clause (i), any person responsible for the management, supervision and control of the workplace.

(iii) in relation to workplace covered under sub-clauses (i) and (ii), the person discharging contractual obligations with respect to his or her employees;

(iv) in relation to a dwelling place or house, a person or a household who employs or benefits from the employment of domestic worker, irrespective of the number, time period or type of such worker employed, or the nature of the employment or activities performed by the domestic worker

e) "**Internal Complaints Committee**" (ICC) means a committee constituted by Company as per this policy;

f) "**Respondent**" means a person against whom the aggrieved person has made a complaint;

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

i. Physical contact and advances; or

ii. a demand or request for sexual favours; or

iii. making sexually colored remarks; or

iv. showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets, or sayings; or

v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

In addition, the following acts circumstances, among other 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:

i. Implied or explicit promise of preferential treatment in employment;

ii. Implied or explicit threat of detrimental treatment in the behavior;

iii. Implied or explicit threats about their present or future employment status;

iv. Interfering with their work or intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.

v. Humiliating treatment is likely to affect the health and safety of the aggrieved person.

vi. any other acts or behavior, any reasonable person views as such

h) "**Workplace**" includes all Company premises and shall include any place visited by the employee in the course of employment including transportation provided by the employer for undertaking such journey.

IV. INTERNAL COMPLAINTS COMMITTEE

1. To inquire and advice suitable action on the complaints on Sexual Harassment, there shall be a Committee called as Sahanaratnabh Limited **Internal Complaints Committee**" (ICC). The Committee shall be constituted by Chairman and Managing Director with the following members:

a) A Presiding Officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case of non-availability of senior level woman employee, the Presiding Officer shall be nominated from administrative units of the workplace.
b) Not less than two (2) Members from amongst employees of the Company preferably committed to the cause of women or who have had experience in social work or have legal knowledge:
c) 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

Provided that at least one-half of the total Members so nominated shall be women.

2. Every complaint received shall be forwarded to the ICC for investigation, inquiry and redressal.

3. The committee members on need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.

V. COMPLAINT REDRESSAL MECHANISM

1. Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to ICC within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident, which may further be extended for a period not exceeding three months.

2. ICC by recording the reasons in writing, if circumstances were such which prevented the aggrieved from filing a complaint within the said period.

3. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of ICC shall render all reasonable assistance to the aggrieved for making a complaint in writing.

4. Where the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, (a) legal heir or friend; or (b) co-worker; or (c) an officer of the National Commission for Women or State Women's Commission; or (d) any person who has knowledge of the incident, with a written consent of the aggrieved women; may make a complaint.

5. The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.

6. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the ICC along with supporting documents and names and address of witnesses.

7. On receipt of such complaint, ICC shall provide a copy of such complaint along with supporting documents to the Respondent within 7 working days.

8. Respondent shall file reply to the complaint along with their list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents from ICC.

9. ICC shall investigate the complaint in detail by giving reasonable opportunities for both the parties. For the purpose of making an inquiry, under this policy, ICC have the power of a civil court, vested in it, in respect of:

   a. Summoning and enforcing the attendance of any person and examining him under oath;
   b. Requiring discovery and production of documents;
   c. Any other prescribed matter.

10. During the enquiry process, the Complainant and the Respondent shall refrain from any form of threat, intimidation or influencing of witnesses.

11. The Committee shall ensure confidentiality during the enquiry process and will ensure that sufficient care is taken to avoid any retaliation against the witnesses.

12. ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.

13. The ICC must complete its investigation within a period of 90 days.

14. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.

15. For conducting the enquiry, the quorum of the ICC shall be of 3 members including the presiding officer.

16. The ICC may before initiate an enquiry, and at the aggrieved party's request, attempt to settle the matter between them through conciliation. However, it shall ensure that:

    a. No monetary settlement made as a basis of conciliation.
    b. Where a settlement has been arrived, the ICC record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation. A copy of the same shall be provided to the aggrieved and the respondent.
    c. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the ICC.

17. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:

    a. To transfer the aggrieved person or the respondent to any other workplace
    b. Grant leave to the aggrieved person, up to three months with salary which is in addition to leave to which he/she is otherwise entitled.

    Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the work place.

VI. ACTIONS

1. The committee shall on completion of the enquiry provide a report of its findings within 10 days from the date of completion of the enquiry and such report shall be made available to both Aggrieved and Respondent.

2. If the allegation against the Respondent has not been proved, the Committee may recommend not to take any action in the matter.

3. If the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Employer to consider sexual harassment as a

misconduct and take action in accordance with the provisions of the Service Rules of the Company.

4. Such action shall be taken within 60 days of the receipt of report.

VII. FALSE ALLEGATIONS

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.

2. On inquiry, if the ICC 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 ICC may recommend to take action against the person who made the complaint as per Service Rules. In such a case, malicious intent has to be established after an enquiry in accordance with the procedure prescribed, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the ICC concludes, that he/she has given false evidence or produced forged or misleading documents.

3. The above provision is not to discourage employees from coming forward with complaints. NSIL recognizes and expects certain 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 conclude as Sexual Harassment. Complaints falls under the above, shall not be considered to be false accusations.

VIII. AWARENESS

1. All the women Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy.

2. An awareness program shall be conducted among the women employees on the Policy & formation of ICC.

3. The Company shall comply with all other details as set out under Section 19 of the Act

to ensure that all employees are provided with the safe working environment at work place.

4. Company shall display the notice showing the name of the ICC members suitably.

5. Company shall make a declaration regarding the Policy on sexual harassment every year in the annual report.

IX. MISCELLANEOUS

1. Company with the approval of Competent Authority may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies the Act.

2. Any such alterations or amendment or rescinding will be intimated to the employees.

3. Nothing contained in these Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

4. The ICC shall prepare an annual report with the following details and shall submit the same to the Management to include in its annual report:

   a. Number of Complaints of sexual harassment received during the year;
   b. Number of complaints disposed of during the year;
   c. Number of cases pending for more than 90 days;
   d. Number of workshops or awareness program against sexual harassment carried out;
   e. Nature of action taken by the employer.

5. The above Annual Report and the MIS should be prepared by the ICC and shall be submitted before the end of each financial year to the Senior Management of the Company.

MONITORING AND REVIEW

The Company reserves the right to modify and, or review the provisions of this Policy, to comply with applicable legal requirements, internal policies, or otherwise with a view to revise the provisions of this Policy to the extent deemed necessary by the Company from time to time. Any such changes or modifications shall be notified by the Company to its employees in due course.

X. DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company.

Footnote

1. The Board of Directors of SahanaRatnabh Limited at its meeting held on July 16, 2026, has adopted this Policy for the first time.

CONCLUSION

1. Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person filing the charge, potential witnesses, and the person accused of improper behaviour. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

2. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

3. The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

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