



KANODIA CEMENT LIMITED

**Prevention of Sexual Harassment at
Workplace Policy**

*(Pursuant to the provisions of Sexual Harassment of Women at
Workplace (Prevention, Prohibition and Redressal) Act, 2013)*

Regd. Office:

**D-19, UPSIDC Land Industrial Area, Sikandrabad, Bulandshahr,
UP-203205**

Corporate Office:

A-21, Sector-16, Noida, Gautam Buddha Nagar, UP-201301



Prevention of Sexual Harassment at Workplace – Policy

Kanodia Cement Limited is committed to providing a place of work that is free of sexual harassment and all forms of intimidation or exploitation of all employees.

Kanodia Cement Limited shall provide healthy working environment that enables employees to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation or exploitation. The company believes that all stakeholders, irrespective of their gender, have the right to be treated with dignity.

In continuation with our endeavor towards improved gender diversity and inclusion along with creating a safe, fair and just workplace, we have put together this policy called Prevention of Sexual Harassment at workplace.

In accordance with this policy, committee and detailed guidelines have been formed to address the issue of sexual harassment at workplace. All employees (permanent, temporary, contract) as well as trainee, visitors to our office premises or service providers are covered under the policy.

If someone has crossed a line, then refer to the guidelines on Prevention of Sexual Harassment at workplace and report to the Internal Complaint Committee.

POLICY ON SEXUAL HARASSMENT OF EMPLOYEES IN KANODIA CEMENT LIMITED

1.0 POLICY

Kanodia Cement Limited is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

2.0 SCOPE AND EFFECTIVE DATE

2.1 This policy extended to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and shall be applicable from 1st day of April 2013.

However, this policy shall subject to be reviewed & updated by the Board from time to time.

2.2 Sexual harassment is defined under the Act and includes, but is not limited to, the following acts

- i) Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards company activity;
- ii) Unwelcome sexual advances involving verbal, non - verbal, or physical conduct such as sexually colored remarks, jokes, letter, phone calls, e-mail, gestures, SMS, posts on social media, showing pornography, lurid stares, physical contact or molestation, stalking, sounds, display of picture, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance;
- iii) Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- iv) Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to person belonging to the other sex;
- v) Conduct of such an act at work place or outside in relation to an employee of Kanodia Cement Limited , or vice versa during the course of employment; and any unwelcome gesture by an employee having sexual overtones;

2.3 "Employee" means any person on the rolls of the company including those on deputation, contract, temporary, part time or working as consultant.

3.0 COMPLAINT REDRESSAL COMMITTEE / INTERNAL COMPLAINT COMMITTEE

3.1 A Committee has been constituted by the management to consider and redress complaints of Sexual Harassment for all branches/offices of Kanodia Cement Limited. The Chairman and Members of the Committee are as follows:

Internal Complaints Committee will comprise of the followings:

- | | |
|-----------------------------|-------------------------------|
| 1. Mrs. Shikha Mehra Chawla | - Chairperson |
| 2. Mr. Abhishek Saxena | - Member |
| 3. Mr. Sumit Singh | - Member |
| 4. Mrs. Sonal Jain | -External Member/POSH trainer |

3.2 A quorum of 3 members is required to be present for proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

4.0 REDRESSAL PROCESS

4.1 Any person who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the Committee in writing with her/his signature within three months of occurrence of incident. However, this period may be extended by the ICC if there are valid reasons for the delay

4.2 The committee will maintain a register to endorse the complaint received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.

4.3 The committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but not later than a week in any case.

4.4 Complainants and respondents will have access to counseling if needed.

4.5 At the first meeting, the Committee members shall hear the complainant and record her/his allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his/her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employee involved and male officer for male employees, involved shall meet and record the statement.

4.6 Thereafter, the person against whom complaint is made may be called for a deposition before the committee and an opportunity will be given to him / her to give an explanation, where after, an "ENQUIRY" shall be conducted and concluded.

4.7 In the event, the complaint does not fall under the purview of sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording of reasons thereof.

4.8 In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action up to and including termination of employment by the Management.

4.9 Retaliation against the complainant or witnesses is strictly prohibited.

5.0 ENQUIRY PROCESS

5.1 The committee shall immediately process with enquiry and communicate the same to the complainant and person against whom complaint is made.

5.2 The committee shall prepare and hand over the statement of allegation to the person against whom complaint is made and give him/her an opportunity to submit a written explanation if she/he so desires within seven days of receipt of the same.

5.3 The complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

5.4 If the complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the committee the

names of witness/es to whom they propose to call.

5.5 If the complainant desires to tender any documents by way of evidence before the committee, she/he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the committee, he /she shall supply original copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be original copies.

5.6 The committee shall call upon all witness mentioned by both the parties.

5.7 The committee shall provide every reasonable opportunity to the complainant and to the person against whom complaint is made, for putting forward and defending their respective case. Parties can appeal the ICC's decision to an appellate authority within 90 days, as per the Act.

5.8 The committee shall complete the "Enquiry" within reasonable period but not beyond 90 days and communicate its findings and its recommendations for action to the Head (HR & Admin). The reports of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightway.

5.9 The Head (HR & Admin) will direct appropriate action in accordance with the recommendations proposed by the committee.

5.10 The committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

6.0 OTHER POINTS TO BE CONSIDERED

6.1 The committee may recommend to the Head (HR & Admin) action which may include transfer or any other appropriate disciplinary action up and including termination of employment.

6.2 The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the policy.

6.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Kanodia Cement Limited shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

6.4 The committee shall analyse and put-up report on all complaints of this nature at the end of the year for submission to Head (HR & Admin).

6.5 In case the committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Compliant.



6.6 Nothing in these guidelines should be taken in any way as a limitation on the powers of the Management Team to decide what disciplinary action(s) is appropriate under given circumstances.

7.0 CONFIDENTIALITY

All inquiries, complaints and investigations are treated confidentially. Information is revealed strictly on a need-to-know basis. However, the identity of the complainant usually is revealed to the accused and witnesses. All individuals contacted in connection with a complaint will be counselled that any information pertaining to the complaint shall be held in confidence. Breach of confidentiality by any party involved in the proceedings may result in disciplinary action

(Revised policy approved in Board Meeting dated 27th December 2025)



