

# POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE

Formulated pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules thereunder

## 1. Commitment and Preamble

ShinzoX Group Limited is committed to providing a work environment that is professional, respectful, and free from all forms of sexual harassment. Every individual at ShinzoX — regardless of gender, designation, or employment type — has the right to a safe and dignified workplace. This Policy has been formulated in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013.

## 2. Scope

This Policy applies to:

All permanent, contractual, temporary, and part-time employees of ShinzoX Group Limited and its subsidiaries  
Interns, trainees, apprentices, and probationers

Third-party contractors, vendors, clients, and visitors while at a Company workplace

"Workplace" includes all offices, factories, project sites, vehicles, client premises, and any location where work-related activities, business travel, or Company events occur.

## 3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour (whether directly or by implication), 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. The following circumstances shall also constitute sexual harassment:

Implied or explicit promise of preferential treatment in exchange for sexual favours

Implied or explicit threat of detrimental treatment for refusing sexual advances

Implied or explicit threat about present or future employment status

Creating an intimidating, offensive, or hostile work environment

Humiliating treatment likely to affect the health or safety of the aggrieved person

## 4. Internal Complaints Committee (ICC)

In accordance with Section 4 of the POSH Act, the Company has constituted an Internal Complaints Committee ("ICC") at each workplace/location with more than ten employees. The ICC comprises:

Presiding Officer: A senior female employee at the workplace

Employee Members: At least two employees committed to the cause of women or with experience in social work or legal knowledge

External Member: One member from an NGO or legal expert with knowledge of issues relating to sexual harassment

At least 50% of the ICC members shall be women. The term of ICC members shall be three years. The Company Secretary (Vaibhav Pratap) shall be the designated nodal officer for POSH compliance. ICC details shall be displayed prominently at all workplaces and on the Company intranet.

## 5. Complaint Procedure

### 5.1 Filing a Complaint

Any aggrieved woman may file a written complaint to the ICC or the Presiding Officer within three months of the date of the incident, or the last incident in a series of incidents. The ICC may extend this period by a further three months if circumstances warrant. Complaints may be submitted in person, by post, or by email to the designated ICC address.

### 5.2 Conciliation

Before initiating an inquiry, the ICC may, at the request of the aggrieved woman, take steps to settle the matter through conciliation, provided no monetary settlement shall be the basis of conciliation.

### 5.3 Inquiry Process

On receipt of a complaint, the ICC shall:

- Provide a copy of the complaint to the respondent within seven working days
- Complete the inquiry in a time-bound and confidential manner within 90 days
- Follow the principles of natural justice — the respondent shall have the opportunity to present their case
- Submit its findings and recommendations to the employer within ten days of completing the inquiry

### 5.4 Interim Relief

The ICC may, at the request of the aggrieved woman, recommend interim measures such as transfer of the aggrieved woman or the respondent to another department or workplace, grant of leave, or restraint on the respondent from reporting on the complainant's work.

## 6. Action on ICC Recommendations

The employer shall act on the ICC's recommendations within 60 days of receipt. Where misconduct is established, action may include written apology, warning, reprimand, withholding of promotion or increments, suspension, or termination. The Company may also deduct appropriate compensation from the respondent's salary.

## 7. False Complaints

Filing a knowingly false or malicious complaint, or providing false evidence, is itself a disciplinary offence. However, inability to substantiate a complaint shall not automatically constitute a false complaint.

## 8. Confidentiality

The identity of the complainant, the respondent, witnesses, and the contents of the complaint, inquiry proceedings, and recommendations shall be kept strictly confidential. Violation of confidentiality is a punishable offence under the POSH Act.

## 9. Non-Retaliation

The Company strictly prohibits any retaliation against a person who has filed a complaint in good faith, or who has provided information or assistance in connection with a complaint. Retaliation is treated as a separate violation of this Policy.

## 10. Awareness and Training

The Company shall:

- Display information about the POSH Act and ICC at every workplace
- Conduct POSH awareness workshops and sensitisation programmes at least annually
- Include POSH training as part of the onboarding programme for new employees
- Ensure ICC members receive specialised training on inquiry procedures

## **11. Annual Report**

The ICC shall prepare and submit to the employer and the District Officer an annual report in the prescribed form as required under the POSH Act, containing the number of complaints received, disposed of, and pending, along with details of workshops conducted.

## **12. Contact**

To contact the ICC or for any queries on this Policy, please email: [posh@shinzo.com](mailto:posh@shinzo.com) or write to the Presiding Officer, ICC, ShinzoX Group Limited, Ward No.7 Preet Nagar Chopan District, Sonbhadra - 231205, Uttar Pradesh, India.