



**SHRADDHA**  
**PRIME**  
**PROJECTS LTD.**  
CONSTRUCTING VALUE

**Shraddha Prime Projects Ltd.**

(Formerly Known As Towa Sokki Limited)

**8857**

## **SHRADDHA PRIME PROJECTS LIMITED**

### **POLICY ON SEXUAL HARASSMENT AT WORKPLACE**

(Issue date – 01.04.2022)

(Amended on – 27.05.2025)



*Approved by BOD at its meeting held on 14.02.2022 and updated on 27.05.2025*

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## I. OBJECTIVE:

**Shraddha Prime Projects Limited ("Shraddha Prime")** is committed to create and maintain secure work environment where it's Employees, Agents, Vendors, Consultants, Auditors etc can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business.

The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith.

All concerned should take cognizance of the fact that Shraddha Prime strongly opposes sexual harassment, and that such behavior against women is prohibited by the law as set down in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as "**Act**") and Rules framed thereunder and as well as mentioned in the terms of employment. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

At Shraddha Prime, we have zero-tolerance for sexual harassment. We value each and every employee working with us and wish to protect their dignity and self-respect. In doing so, we are determined to promote a working environment in which persons of both genders complement each other as equals in an environment that encourages maximum productivity and to keep the personal dignity.

We at Shraddha Prime are committed towards giving every employee a just and fair hearing on issues encountered by them at the workplace with special attention to sexual harassment. Shraddha Prime will take very serious disciplinary action against any victimization of the employee who is complaining or the alleged harasser that may result from a complaint.

## II. SCOPE:

Shraddha Prime's Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company. Shraddha Prime encourages

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every employee who believes they are sexually harassed to use the redressal mechanism as provided in this policy.

The Policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. Company's offices / branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment including transportation provided by the company for undertaking such visit. Shraddha Prime's Policy against sexual harassment at Workplace includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors, partners and visitors including outsource employees. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

Sexual harassment is judged by the impact on the complainant and not the intent of the Respondent. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

This Policy comes into force with effect from 01.04.2022.

### III. DEFINITION:

- a. "Aggrieved Person" means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.
- b. "Company" means **Shraddha Prime Projects 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 otherwise, whether the terms

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- of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;
- d. "Internal Complaints Committee" means a committee constituted by Company as per this Policy.
  - e. "Respondent" means a person against whom the aggrieved person has made a complaint.
  - f. "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:
    - i. Physical contact and advances; or
    - ii. A demand or request for sexual favors; 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; or

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

    - i. implied or explicit promise of preferential treatment in their employment;
    - ii. implied or explicit threat of detrimental treatment in their employment
    - iii. implied or explicit threat about their present or future employment status;
    - iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
    - v. Humiliating treatment likely to affect the health and safety of the aggrieved person. In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of a female employee, will be considered as sexual harassment.
  - g. "workplace" includes any department, organization, undertaking, establishment, enterprise institution, office or branch unit. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

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#### **IV. POLICY STATEMENT**

1. All employees of the Company will maintain high standard of dignity, respect and positive regard for one another in all their dealings.
2. All employees will understand and appreciate the rights of the individual to be treated with dignity.
3. All employees are required to maintain a work environment, which is free from any kind of harassment.
4. Employees will refrain from committing any acts of sexual harassment at work place.
5. Allegation of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
6. All employees will be protected against victimization, retaliation for filing or reporting a complaint in sexual harassment and will also be protected from sales accusation.

#### **V. COMPLAINT REDRESSAL MACANISM**

An Internal Committee has been constituted by the management to consider and redress complaints of Sexual Harassment. The Committee comprises of following members:

Title	Name	Designation	Email id
IC Chairperson	Shivangi Datta	Independent Director	shivangi.hr79@gmail.com
External Member	Rani Dalavi	Advocate	rani.dalavi@gmail.com
Internal Member	Ramchandra Krishnakant Ralkar	Director	real1space@gmail.com
Internal Member	Tejal Nalawade	Sr. Accountant	tejal.nalawade@shraddhaprimeprojects.in

The quorum for a meeting of the Committee shall be three (3) members, which shall include the Chairperson/Presiding Officer and at least two other members, with a minimum of one woman member. The quorum shall ensure that women members are in the majority.

#### **VI. REDRESSALPROCESS**

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1. Any employee 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 his/her signature within 10 days of occurrence of incident.
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.
3. The Committee will hold a meeting with the Complainant within 7 days of the receipt of the complaint, but no later than a week in any case.
4. 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 employees involved and a male officer for male employees, involved shall meet and record the statement.
5. 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.
6. 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 the reasons thereof.
7. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

## **VII. ENQUIRY PROCESS**

1. The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
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 7 days of receipt of the same.
3. The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
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 whom they propose to call.
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

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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.

6. The Committee shall call upon all witnesses mentioned by both the parties.
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. The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the Chairman of the Company. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
8. The Chairman of the Company will direct appropriate action in accordance with the recommendation proposed by the Committee.
9. The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

#### **VIII. FALSE ACCUSATIONS:**

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. If the Internal Complaint Committee 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 Internal Complaint Committee may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, 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 Internal Complaint Committee concludes, that he/she has give false evidence or produced forged or misleading documents.
3. It is to be noted that this statement is not intended to discourage employees from coming forward with any complaints. Shraddha Prime recognizes and expects that some 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 constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

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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 employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), the newly introduced Section (S. 354A) which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

**X. OTHER POINTS TO BE CONSIDERED**

1. The Committee may recommend to the Chairman of the Company to take necessary action which may include transfer or any of the other appropriate disciplinary action.
2. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.
3. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Shraddha Primes shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
4. The Committee shall analyse and put up report on all complaints of this nature at the end of the year for submission to Chairman of the Company.
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 Complaint.

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