

Stock Holding Corporation of India Limited

Policy on Prevention of Sexual Harassment at the Workplace

(April 2026)

1) Summary of Key Information

Company:	Stock Holding Corporation of India Ltd. (StockHolding)
Communicated to all employees:	Yes
Author Group:	Internal Committee (IC)
Approved By:	The Competent Authority
Date of Last Review :	April 2026

2) Purpose and Objectives:

2.1 Purpose

Stock Holding Corporation of India Ltd. (StockHolding) is committed to maintaining a work environment free from all forms of harassment and unlawful discrimination and ensures that all Employees (as defined below) are treated with dignity, respect and courtesy.

Sexual Harassment (as defined below) at the workplace is a grave offence and is, therefore, punishable. Harassment, either intentional or unintentional, has no place in the work environment.

The present policy, i.e. the Policy on Prevention of Sexual Harassment at StockHolding ("**Policy**") takes complete cognizance of the recently laid down statute, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**the Act**") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("**the Rules**") laid down there under and as amended from time to time.

2.2 Policy

StockHolding's first Operating Principle expresses the commitment "to respect the dignity and inherent rights of the individual human being in all dealings with people." Each individual's personal safety and dignity, and the ability to perform a job effectively without distractions or interference, are of prime concern to StockHolding. A good working

environment is essential to the well-being of all Employees. Therefore, it is StockHolding's policy that harassment of any type will not be tolerated.

2.3 Scope and Effective Date

This Policy extends to all Employees of StockHolding in India and is deemed to be incorporated in the service conditions of all Employees and comes into effect immediately. This policy is with respect to prevention, prohibition and redressal of sexual harassment which may arise in places not limited StockHolding'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 StockHolding for undertaking such visit and to all company sponsored social events. Working relationships include but are not limited to those between Employees or between an Employee and a business contact, such as a supplier, customer, or employee of an outside agency.

3) Definitions:

3.1 Sexual Harassment :

In the context of working relationships, Sexual Harassment shall include any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- (i) Physical contact and/or advances; or
- (ii) A demand or request for sexual favors; or
- (iii) Making sexually colored remarks; or
- (iv) Showing pornography; or
- (v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature
- (vi) Digital harassment including cyberstalking, cyberbullying, trolling, etc.

Further, the following circumstances may amount to sexual harassment if it occurs or is present in relation to any other implied or express act of Sexual Harassment:

- a. Implied or explicit promise of preferential treatment in her employment; or
- b. Implied or explicit threat of detrimental treatment in her employment ; or
- c. Implied or explicit threat about her present or future employment status; or
- d. Interference with her work or creating an intimidating or offensive or hostile work environment for her; or

- e. Humiliating treatment likely to affect her health or safety

Some examples of Sexual Harassment include :

1. Verbal: Includes but not limited to sexual innuendoes, suggestive comments, jokes of a sexual nature, sexual propositions, lewd remarks, threats, and requests for any type of sexual favor, including repeated, unwelcome requests for dates.
2. Nonverbal: includes but not limited to the distribution, display, or discussion of any written or graphic material, including calendars, posters, and cartoons that are sexually suggestive, or shows hostility toward an individual or group because of sex, suggestive or insulting sounds, leering, staring, whistling, obscene gestures, content in letters and notes, facsimiles, e-mail, that is sexual in nature.
3. Physical: includes but not limited to unwelcome, unwanted physical contact, including but not limited to, touching, pinching, patting, brushing up against, hugging, cornering, kissing, fondling, coerced sexual intercourse, or assault.
4. Digital: includes showing porn, displaying sexually offensive material through any device, inappropriate messaging in any form, sharing sexually offensive content on social media, cyberstalking.

3.2 Aggrieved woman

Aggrieved woman means 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.

3.3 Employee

Employee means a person employed at a work place for any work on regular, temporary, ad-hoc or daily wage 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 voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

3.4 Respondent

Respondent means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Individual under Section 9 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013.

3.5 Workplace

Includes any department, office, branch and 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.

4) Internal Committee (IC)

StockHolding has constituted an Internal Committee (IC) as per the Section 4 of the Act. Every complaint received shall be forwarded to the Internal Committee (whose contact details have been circulated) for redressal.

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

The constitution of the Internal Committee shall be reviewed every 3 years from the date of their nomination, as may be specified by the employer.

The Internal Committee shall prepare an annual report in relation to the complaints received under this Policy, which shall include the following details:

- a) Number of complaints received of sexual harassment in the year
- b) Number of complaints disposed off
- c) Number of cases pending more than 90 (ninety) days
- d) Number of workshop / awareness programmes conducted against sexual harassment
- e) Nature of action taken by the employer / IC.

The Internal Committee shall submit such report to the employer.

5) Responsibilities regarding Prevention of Sexual Harassment at Work Place

All Employees, agents, customers, vendors, partners, etc. shall have access to this policy at any given point of time. Employees must share the responsibility of understanding and preventing discrimination, harassment and retaliation. Employees who believe they have been discriminated against or sexually harassed have the primary obligation to immediately bring the matter to the Internal Committee's attention.

Officers in positions of authority have the responsibility to act promptly to eliminate any discrimination or harassment which exists in their areas of responsibility. If a manager or supervisor knows that discrimination, harassment, or retaliation is occurring, or receives information that discrimination, harassment or retaliation might be occurring, he or she **MUST** take immediate action to address the problem.

The issue is to be immediately reported to the Internal Committee by the Aggrieved Individual, but not later than three months from the date of the incident and in case of a series of incidents, three months from the date of last incident. StockHolding shall comply with all other details as set out under Section 19 of the Act. i.e. ensure that all employees are provided with the safe working environment at the workplace, organise workshops and awareness programmes sensitizing employees regarding the provisions of the Act, provide necessary assistance to the complainant and support to the IC for conducting the enquiry, etc.

6) Complaint Procedure

Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee.

Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee or the Chairperson, shall render all reasonable assistance to the woman for making the complaint in writing.

Provided further that the Internal Committee or, as the case may be, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint under this section.

The information disclosed by such Complainant should be treated as confidential information by the members of the Internal Committee.

7) Complaint Handling

The Complainant may make, in writing, a complaint of Sexual Harassment at work place to the Internal Committee along with the supporting documents and the name and address of the witnesses. The Internal Committee shall, within a period of seven days from the date of receipt of the Complaint, send a copy to the Respondent.

The Respondent shall file his/her reply to the Internal Committee along with the list of documents and the name and address of the witnesses, within ten working days from the date of receipt of the Complaint.

The Internal Committee may, before initiating an inquiry, at the request of the Complainant may attempt to settle the matter through conciliation between the Complainant and the Respondent. However, no monetary settlement shall be made on the basis of the conciliation. Where settlement has been arrived through conciliation, the Internal Committee shall document the settlement terms and take signatures of both parties. A copy of the settlement terms to be provided to both the parties and also a copy to be forwarded to the Management of StockHolding to take action as specified in the recommendation.

Where settlement has been arrived no further inquiry will be conducted by the Internal Committee.

The Internal Committee will make all reasonable efforts to investigate complaints thoroughly and fairly, giving careful consideration to protect the rights and dignity of the people involved, including the person who is believed or claimed to be harassing another. Employees who report instances of harassment and all those contacted in connection with the investigation are obliged to

Cooperate in the investigation of possible violations and to maintain the confidentiality of the process. Failure to cooperate in an investigation or reporting false claims may lead to disciplinary action including but not limited to suspension and termination.

The Internal Committee shall proceed to make an inquiry into the complaint in accordance with the applicable law and the principles of natural justice and further during the course of inquiry provide an opportunity of being heard to the Complainant and the Respondent and the relevant witnesses provided by the Complainant and the Respondent.

The parties shall not be allowed to bring in any legal practitioner or any external entity to represent them in their case at any stage of the proceedings before the *Internal Committee*. The investigation process shall be completed with a period of ninety days from date of commencement of the inquiry.

All Employees should be aware that the privacy and confidentiality of all persons involved in reporting incidents of possible Sexual Harassment and in the investigation of a report of possible Sexual Harassment will be maintained to the extent reasonable and possible under the circumstances. In addition, the Internal Committee will take appropriate corrective action to remedy violations of this portion of the policy, in line with the Service Manual of StockHolding.

8) Interim Measure

- (1) During the pendency of an inquiry on a written request made by the aggrieved woman, the Internal Committee, as the case may be, may recommend to the employer to—
 - (a) Transfer the aggrieved woman or the respondent to any other workplace; or
 - (b) Grant leave to the aggrieved woman up to a period of three months; or
 - (c) Grant such other relief to the aggrieved woman as may be prescribed.
- (2) The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.
- (3) On the recommendation of the Internal Committee under sub-section (1), the employer shall implement the recommendations made under sub-section (1) and send the report of such implementation to the Internal Committee.

9) Inquiry Report and Measures:

(1) On the completion of an inquiry, the Internal Committee shall provide a report of its findings to the employer within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.

(2) Where the Internal Committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the employer that no action is required to be taken in the matter.

(3) Where the Internal Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer -

(i) to take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent.

(ii) to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with the provisions of section 15 of the Act.

Provide that in case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment, it may direct to the respondent to pay such sum to the aggrieved woman.

(4) The employer shall act upon the recommendation within sixty days of its receipt by him.

(5) Where the allegation is proved to be false or malicious, action may be recommended against the Complainant as deemed fit by the Internal Committee, upto and including termination. However, the mere inability to substantiate a complaint or provide adequate proof does not constitute grounds for taking action against the Complainant. Action can be taken, as recommended by the Internal Committee, against witness who give false evidence or produce any forged or misleading document.

10) Confidentiality

All the complaints filed, details of witness, details of hearings and records maintained, actions taken by StockHolding under this Policy shall be kept strictly confidential. No information will be released / shared to anyone including Employees concerning the details of complaint and the inquiry proceedings. Employees involved in the proceedings under this Policy are required to maintain strict confidentiality of any / all relevant details including but not limited to the complaint, details of the complainant, and the inquiry proceedings.

11) Appeal

If the Aggrieved Individual is not satisfied by the decision or recommendations of the Internal Committee or the non- implementation thereof, they may within a period of 90 (ninety) days of receipt of the decision or recommendations, prefer an appeal to the court or tribunal in accordance with the provisions of any applicable laws.

12) Retaliation is prohibited

Employees are expected to report instances of harassment, and no retaliation will be made against an Employee for making a good- faith report or for participating in the investigation of a complaint. If it is determined that retaliation has occurred, appropriate disciplinary action will be taken.

However, the reporting of a deliberately false accusation will subject the Employee making the report to possible disciplinary action.

13) Modifications to the Policy:

StockHolding reserves the right to alter, amend, add to, vary, rescind or substitute any of the provisions of the Policy at any time as and when it finds it necessary to do so as long as it complies with the Act.

If any of the provisions contained herein are found to be invalid, illegal or unenforceable in any respect, the validity, legality and enforceability of the remaining provisions shall not in any way be affected or impaired.