KHEMANI

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KHEMANI DISTRIBUTORS & MARKETING LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

[Pursuant to SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 & Companies Act, 2013]

KHEMANI

1. INTRODUCTION

This Policy has been framed in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013" hereinafter referred as POSH ACT, 2013 and Rules framed there under. The Policy covers all the key aspects of the said Act and the Rules and for any clarification reference shall always be made to the said Act and the Rules and the provisions of the said Act and the Rules shall prevail.

2. OBJECTIVE

Sexual harassment at the workplace results in violation of the fundamental rights of a woman

- ✓ To equality under Article 14 and Article 15 of the Constitution of India;
- ✓ To life and to live with dignity under Article 21 of the Constitution of India;
- ✓ To practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment.

Protection against sexual harassment and the right to work with dignity are universally recognized human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

This policy applies to all employees (full-time, part-time, contractual, interns), trainees, clients, visitors, and any other person engaged with Khemani in the course of work-related activities.

The policy covers behavior within the workplace, during work-related travel, at company-sponsored events, and while representing Khemani in any capacity.

3. DEFINITIONS

a) Sexual Harassment: Any unwelcome act or behavior (whether directly or by implication) of a sexual nature that creates an intimidating, hostile, or offensive work environment. This includes:

- ➢ Physical advances, demands for sexual favors, or any other verbal, nonverbal, or physical conduct of a sexual nature.
- ➢ Unwanted comments, jokes, gestures, or any other conduct that undermines the dignity of an individual.

b) Employee: Any person employed by Khemani including temporary, contractual, or part-time staff.

c) Internal Complaints Committee (ICC): A designated body established as per the guidelines of the POSH Act to receive and address complaints of sexual harassment.

4. INTERNAL COMPLAINTS COMMITTEE (ICC):

As per the requirement of provisions of "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Company has constituted Internal Complaints Committee for protecting, prevention and redressal of sexual harassment. The constitution of Internal Complaints Committee is as below:

Name of the Member	Position	Designation
Mrs. Anupa Amit Khemani	Presiding Officer	Non-executive Director
Ms. Charmi Soni	Member	Company Secretary
Mr. Amit Khemani	Member	Executive Director
Ms. Gunja Mishra	Member	Computer Operator

5. POLICY STATEMENT

Khemani has a zero-tolerance policy towards sexual harassment. We are committed to:

- ✓ Ensuring that no employee or any other individual experiences sexual harassment in any form.
- ✓ Encouraging employees to report any incidents without fear of reprisal.
- ✓ Providing immediate and effective redressal mechanisms.
- ✓ Taking appropriate disciplinary action against any employee found guilty of such behavior.

6. RESPONSIBILITIES

Employer/Management:

- ✓ Create and disseminate this policy.
- ✓ Ensure a safe work environment and that employees are aware of their rights and responsibilities.
- ✓ Promptly address any reported incidents and ensure that investigations are fair and impartial.
- ✓ Ensure the proper functioning of the Internal Complaints Committee (ICC).

Employees:

- ✓ Maintain decorum and respect for fellow employees.
- ✓ Refrain from any behavior that may be perceived as sexual harassment.
- ✓ Report any incidents of sexual harassment to the ICC or designated authorities without delay.

Internal Complaints Committee (ICC):

- ✓ Receive and confidentially address complaints of sexual harassment.
- ✓ Conduct prompt and unbiased inquiries.
- ✓ Recommend appropriate remedial actions or disciplinary measures based on the investigation findings.
- ✓ Maintain records of all complaints and their outcomes.

7. REPORTING PROCEDURE

1) Filing a Complaint:

- ✓ Any individual who experiences or witnesses sexual harassment should submit a written complaint to the ICC.
- ✓ Complaints may be submitted in person, via email, or through the designated HR portal.
- ✓ All complaints will be acknowledged within 2 days of receiving it either orally or written, both acceptable.

2) Assistance and Support:

- ✓ Employees can seek support from HR or designated persons during the reporting process.
- ✓ Confidentiality will be maintained to the fullest extent possible.

8. INVESTIGATION PROCESS

1) Preliminary Assessment:
The ICC will assess the complaint to determine if the allegations fall within the scope of this policy.

2) Inquiry:
A fair and impartial inquiry will be initiated. Both the complainant and the alleged harasser will be given an opportunity to present their version of events.

3) Findings and Recommendations:
After a thorough investigation, the ICC will document its findings and recommend appropriate remedial measures.

4) Timelines:
The entire process will be conducted promptly, with interim measures taken to protect the complainant if required.

9. CONFIDENTIALITY

- ✓ All information regarding complaints, investigations, and outcomes will be treated with strict confidentiality.
- ✓ Disclosure of details to unauthorized persons will be strictly prohibited.
- ✓ Both the complainant and the respondent will have their identities protected as far as possible during and after the investigation.

10. DISCIPLINARY ACTION

If the ICC substantiates a complaint of sexual harassment, Khemani will take appropriate disciplinary action against the offender, which may include:

- ✓ Counseling and training.

- ✓ Written warnings.
- ✓ Suspension or termination of employment.

In serious cases, the company may also initiate legal action as deemed necessary.

11. TRAINING AND AWARENESS

- ✓ Khemani will conduct regular training sessions and workshops to educate employees about sexual harassment and the procedures for reporting and redressal.
- ✓ Awareness programs will be designed to ensure that every employee understands their rights, responsibilities, and the company's commitment to a safe workplace.

12. GRIEVANCE REDRESSAL AND MONITORING

- ✓ A periodic review of the policy's effectiveness will be undertaken.
- ✓ Feedback from employees will be sought to improve processes and ensure compliance.
- ✓ The ICC will maintain records of all complaints and their resolution, and this data will be used to monitor the workplace environment.

13. AMENDMENTS AND UPDATES

This policy will be reviewed annually or as needed to ensure its continued relevance and effectiveness in addressing and preventing sexual harassment. Any amendments will be communicated to all employees.

#This policy was reviewed and approved by Board of directors in their meeting held on 21/05/2025#