POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

1. PREAMBLE

Vedant Asset Limited ("Company") is committed to provide a safe, secure and dignified work environment free from sexual harassment and discrimination. The Company believes that all employees have the right to be treated with dignity and respect and is committed to promoting a workplace culture based on equality, mutual trust and professionalism.

This Policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and the rules framed thereunder.

2. OBJECTIVES

The objectives of this Policy are:

a) To provide a workplace free from sexual harassment.
b) To promote gender-sensitive and respectful behavior.
c) To provide an effective complaint and redressal mechanism
d) To create awareness regarding gender sensitivity and workplace conduct.
e) To ensure fair and timely investigation of complaints.
f) To create awareness regarding prevention of sexual harassment.

3. APPLICABILITY

This Policy shall apply to:

- All employees of the Company, whether permanent, temporary, probationary, contractual, trainee, intern, consultant or apprentice.
- Directors of the Company.
- Visitors, clients, vendors, service providers and any person interacting with employees in relation to work.

The Policy shall apply to all workplaces of the Company including:

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- Registered office and branch offices.
- Client locations.
- Business travel.
- Conferences, seminars, training programs and official events.
- Work-from-home arrangements.
- Any place visited by an employee arising out of or during employment.
- Virtual workplaces, emails, messaging platforms and video conferences

4. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment includes any one or more of the following unwelcome acts or behavior, whether directly or by implication:

a) Physical contact and advances;
b) Demand or request for sexual favours;
c) Making sexually coloured remarks;
d) Touching, patting, pinching or brushing against a person
e) Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

The following circumstances, among others, may constitute sexual harassment:

- Implied or explicit promise of preferential treatment.
- Implied or explicit threat of detrimental treatment.
- Interference with work performance.
- Creation of an intimidating, hostile or offensive work environment.
- Humiliating treatment affecting health or safety.

Examples includes but not limited to:

- Unwelcome touching, hugging or physical contact.
- Lewd jokes or comments
- Repeated unwanted invitations
- Sexual jokes, comments or innuendos.
- Sending inappropriate messages, emails or images.
- Repeated requests for dates despite refusal.
- Staring, gestures or remarks of a sexual nature.
- Displaying offensive or sexually explicit content.

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5. INTERNAL COMMITTEE (IC)

The Company shall constitute an Internal Committee in accordance with the POSH Act comprising:

1. Presiding Officer – A senior woman employee employed at a senior level.
2. At least two employee members committed to women's causes or having legal/social work experience.
3. One external member from an NGO or association committed to women's rights or a person familiar with issues relating to sexual harassment.

COMPOSITION REQUIREMENT

At least 50% of the members shall be women.

The Internal Committee shall have a tenure of three years (3 years) unless otherwise reconstituted by the Company.

6. DUTIES OF THE INTERNAL COMMITTEE

The Internal Committee shall:

- Receive and acknowledge complaints.
- Conduct fair and impartial inquiries.
- Maintain confidentiality.
- Recommend appropriate action.
- Submit annual reports as required under law.
- Conduct awareness and sensitization programs.

7. COMPLAINT MECHANISM

Any aggrieved woman may submit a written complaint to the Internal Committee within three months from the date of the incident. In case of a series of incidents, the complaint shall be made within three months from the date of the last incident or three months from the date of the last incident in case of a series of incidents.. The Internal Committee may extend the time limit by a further period of three months if sufficient cause is shown. Where the complainant is unable to make a written complaint, the Internal Committee shall provide reasonable assistance.

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8. CONCILIATION

Before initiating an inquiry, the Internal Committee may, at the request of the complainant, attempt conciliation between the parties. However, no monetary settlement shall be made as the basis of conciliation. Settlement terms shall be recorded and signed by both parties (complainant and respondent). If conciliation is successful, the settlement shall be recorded and forwarded to the employer for implementation.

9. INQUIRY PROCESS

Where conciliation is not requested or fails, the Internal Committee shall conduct an inquiry. The inquiry shall be completed within ninety (90) days from the date of receipt of the complaint. Both parties shall be given an opportunity to present evidence and witnesses. Principles of natural justice shall be followed throughout the inquiry process.

10. INTERIM RELIEF

During the pendency of the inquiry, the Internal Committee may recommend:

- Transfer of either party.
- Grant of leave to the complainant up to three months.
- Restraining the respondent from reporting on the complainant's work.
- Any other appropriate relief deemed necessary

11. INQUIRY REPORT

The Internal Committee shall submit its report to the employer within ten (10) days of completion of the inquiry. Where allegations are proved, the Committee may recommend disciplinary action. Where allegations are not proved, the Committee shall recommend closure of the complaint.

12. DISCIPLINARY ACTION

Depending on the gravity of misconduct, disciplinary action may include:

- Written apology.
- Warning or reprimand.
- Withholding promotion or increment.
- Suspension.
- Termination of employment.
- Deduction from salary for compensation.

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- Any other action as deemed appropriate.

13. FALSE OR MALICIOUS COMPLAINTS

If the Internal Committee concludes that a complaint was made with malicious intent or false evidence was knowingly produced, it may recommend action in accordance with applicable service rules. Mere inability to substantiate a complaint shall not attract action under this clause.

14. CONFIDENTIALITY

The Company, Internal Committee members, complainant, respondent and witnesses shall maintain strict confidentiality regarding:

- Identity of parties.
- Complaint details.
- Inquiry proceedings.
- Recommendations and actions taken.

Violation of confidentiality may attract disciplinary action.

15. RESPONSIBILITIES OF EMPLOYEES & RESPONSIBILITIES OF THE COMPANY

Every employee shall:

- Treat colleagues with dignity and respect.
- Refrain from acts of sexual harassment.
- Cooperate during investigations.
- Report incidents witnessed or experienced.
- Participate in awareness programs.

The Company shall:

- Provide a safe working environment.
- Display POSH awareness notices.
- Organize regular training and awareness programs.
- Assist complainants in filing police complaints where necessary.
- Ensure implementation of recommendations of the Internal Committee.
- Include POSH compliance in the Board's Report and Annual Report wherever applicable.

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16. PROTECTION AGAINST RETALIATION

No employee shall be subjected to retaliation, victimization, discrimination or adverse employment consequences for filing a complaint, participating in an inquiry or supporting an investigation conducted under this Policy.

17. RECORD KEEPING

The Internal Committee shall maintain records of:

- Complaints received.
- Inquiries conducted.
- Recommendations made.
- Actions taken.
- Training and awareness programs conducted.

18. POLICY REVIEW

This Policy may be amended, modified or revised by the Board of Directors of Vedant Asset Limited from time to time to ensure compliance with applicable laws and organizational requirements.

19. EFFECTIVE DATE

This Policy shall come into effect from the date of approval by the Board of Directors of Vedant Asset Limited and shall remain in force until modified or rescinded.

Approved by the Board of Directors of Vedant Asset Limited

Date: 18.06.2026

Place: RANCHI

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