RATHOD JEWELLERY MANUFACTURING LIMITED
(formerly known as Rathod Jewellery Manufacturing Private Limited)

CIN: U36910PN2012PLC142922
Registered Office: Plot No. F-12/1, MIDC Shiroli, Kolhapur, Hatkanangle, Maharashtra, India – 416122.

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

A. Commitment

Our Company is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment on the basis of their gender.

The objective of the Policy on Prevention of Sexual Harassment at the Workplace (the "**Policy**") is to provide protection against sexual harassment of individuals at the workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith. We at the Company are committed to providing a just, fair, and impartial working environment and will scrutinize any act of sexual misdemeanor with strict action.

This policy has been framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**Act**"), although this Policy covers key aspects of the Act, for any clarification the provisions of the Act will prevail.

This Policy is applicable with immediate effect.

B. Scope

1. This policy applies to all categories of employees of the Company, including permanent employees, temporary employees, trainees and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace. The Company will not tolerate sexual harassment, if engaged in, by any employee or co-worker of the Company, its clients or by suppliers or any other business associates.

2. The workplace includes:
   a) All offices, establishments or other premises where the Company's business is conducted.
   b) All company-related activities performed at any other site away from the Company's premises.
   c) Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

C. Definition of sexual harassment:

1. Sexual harassment may be one or a series of incidents involving unsolicited and unwelcomed sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

2. Sexual Harassment at the workplace includes:
   a) unwelcomed sexual advances (verbal, written or physical),
   b) demand or request for sexual favours,
   c) Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
   d) Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.
   e) verbal abuse or 'joking' that is sex-oriented;
   f) any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment

and /or submission or rejection of the conduct is used as a basis for making employment decisions;

g) any other type of sexually-oriented conduct.

D. Responsibilities regarding sexual harassment:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

E. Complaint mechanism:

An appropriate complaint mechanism in the form of "**Complaints Committee**" has been created in the Company for time-bound redressal of the complaint made by the victim

F. Complaints Committee:

1. The Company has constituted a Complaints Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

2. Initially, and till further notice, the Complaints Committee will comprise of the following four members out of which at least two members will be of the same gender as that of the complainant:

   a) **Presiding Officer**: A woman employed at a senior level in the organization or workplace from amongst the employees;
   b) At least 2 members from amongst employees, committed to the cause of women or have had experience in social work or having legal knowledge;
   c) One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

   At least one half of the total members shall consist of women.

   The Presiding Officer and every member shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

3. The Complaints Committee is responsible for:
   a) Receiving complaints about sexual harassment at workplace;
   b) Investigating every formal written complaint of sexual harassment;
   c) Co-ordinating with employer in implementing appropriate action;
   d) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
   e) Discouraging and preventing employment-related sexual harassment.

G. Procedures for resolution, settlement or prosecution of acts of sexual harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

1. Informal Resolution Options

   a) When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

   b) If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Complaints Committee for redressal of their grievances. The Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

2. Complaints:

a) An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Complaints Committee constituted by the Company. The complaint shall have to be in writing and can be in the form of a letter, preferably within fifteen (15) days from the date of occurrence of the alleged incident and in case of a series of incidents, within fifteen (15) days from the occurrence of last alleged incident, sent in a sealed envelope, but no later than three months from the date of incident and in case of a series of incidents, no later than three months from the date of last incident (The Complaints Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.). Alternately, the employee can send the complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

b) The Presiding Officer of the Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within thirty (30) days from receipt of the complaint.

c) In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

d) If the Presiding Officer of the Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.

e) Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

3. The Complaints Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Board as soon as practically possible and in any case, not later than ninety (90) days from the date of receipt of the complaint. The Executive Director will ensure corrective action on the recommendations of the Complaints Committee and keep the complainant informed of the same.

4. Corrective action may include any of the following:
   a) Formal apology.
   b) Counselling.
   c) Conciliation.
   d) Written warning to the perpetrator and a copy of it maintained in the employee's file.
   e) Change of work assignment / transfer for either the perpetrator or the victim.
   f) Suspension or termination of services of the employee found guilty of the offence.

5. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

H. Confidentiality

1. The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

2. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

I. Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

J. Protection to complainant / victim

1. The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

2. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

3. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

K. Statutory Disclosures in Board Report

1. The Company shall disclose in its annual Board Report, in accordance with Section 134 of the Companies Act, 2013 and the Companies (Accounts) Second Amendment Rules, 2025:

   (a) The number of sexual harassment complaints received during the financial year;
   (b) The number of complaints disposed of during the year;
   (c) The number of complaints pending for more than 90 days;
   (d) A statement confirming compliance with the constitution and functioning of the Internal Complaints Committee (ICC) under the POSH Act, 2013;
   (e) A declaration of compliance with the Maternity Benefit Act, 1961.

2. The Board Report will include data on the company's workforce gender composition, specifically the number of male, female, and transgender employees each financial year.

3. The Company affirms compliance with the provisions of the Maternity Benefit Act, 1961, including the grant of maternity leave, medical bonuses, and other statutory entitlements for women employees

L. Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect**.**

M. Amendment

The board of directors of Company may amend this Policy from time to time to meet the legal or implementation changes.

Effective Date: 28-09-2026

Place: Kolhapur

Note: Approved in the meeting dated 28-09-2026

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RATHOD JEWELLERY MFG. LTD. KOLHAPUR