

POLICY ON SEXUAL HARASSMENT
OF WOMEN AT WORKPLACE
(PREVENTION, PROHIBITION &
REDRESSAL ACT), 2013

1. BACKGROUND

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ["hereinafter referred as the Act"] is an Act 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 or incidental thereto.

As per the Act, an "Internal Complaints Committee" needs to be constituted along with laid down guidelines for redressal of complaint related to sexual harassment of Women at workplace.

Simbhaoli Sugars Limited* ("hereinafter referred as the Employer or the Company") is an equal employment opportunity Company and is committed of creating a healthy, safe and secure work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company strongly believes in a work culture wherein all the employees have the right to be treated with dignity, fairness and respect. Sexual harassment at the workplace or other than workplace if involving employees is a grave offence and is, therefore, punishable.

**M/s Simbhaoli Spirits Limited known as M/s Simbhaoli Sugars Limited in pursuance to Scheme of Amalgamation, as sanctioned by the Hon'ble High Court of Judicature at Allahabad.*

2. OBJECTIVES

- i. Sexual harassment at a workplace is considered violation of women's right to equality, life and liberty. It creates an insecure and hostile work environment, which discourages women's participation in work, thereby adversely affecting their social and economic empowerment and the goal of inclusive growth.
- ii. With more and more women joining the workforce, both in organized and unorganized sectors, ensuring an enabling working environment for women through legislation is felt imperative by the Government. The proposed legislation contains provisions to protect every woman from any act of sexual harassment irrespective of whether such woman is employed or not.
- iii. To comply with the directives of Hon'ble Supreme Court of India requiring all employers to develop and implement a policy for prevention of sexual harassment at the workplace.
- iv. To evolve a permanent mechanism for the prevention and redressal of sexual harassment cases and other acts of gender based violence at the workplace.
- v. To follow and implement the Act enjoining all employers to constitute an "Internal Complaints Committee" and lay down guidelines for redressal of complaint related to sexual harassment of Women at the workplace.

3. SCOPE

This Policy, shall be applicable to all the employees of the Company engaged currently and will be employed in future including those on deputation, Contract, Temporary, Trainee, Part-Time or Consultants (referred to as employee for policy) at all the Units or offices across India and shall also be applicable on any Branch that is established by the Company anytime in future in India. This Policy is amended w.e.f. February 15, 2016.

4. CONDITIONS

The "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- a) Physical contact and advances;
- b) Demand or request for sexual favors;
- c) Sexually colored remarks;
- d) Showing pornography;
- e) Other unwelcome physical, verbal or non-verbal conduct of a sexual nature;
- f) Eve-teasing;
- g) Unsavory remarks;
- h) Jokes causing or likely to cause awkwardness or embarrassment;
- i) Innuendos and taunts;
- j) Gender based insults or sexist remarks;
- k) Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like;
- l) Touching or brushing against any part of the body and the like;
- m) Displaying pornographic or other offensive or derogatory pictures, cartoons, pamphlets or sayings;
- n) Forcible physical touch or molestation and physical confinement against one's will and any other act likely to violate one's privacy.

5. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE

A Complaints Committee consisting of five members has been constituted known as the "Internal Complaints Committee" for redressal of any such issues. The Internal Complaints Committee will preferably comprise of a senior level woman employee nominated as the Presiding Officer, two female employee representatives; one employee having legal knowledge, and one non-employee member being committed to the cause of women/familiar with the issues related to sexual harassment. At least half or more than half Internal Complaint Committee members shall be women.



The quorum of the Internal Complaints Committee meeting shall be atleast three members provided the presence of aforesaid Presiding Officer and the non-employee member will be mandatory and also atleast half of the members shall be women.

1. Ms. Gursimran Kaur Mann (Chairperson/Presiding Officer)
2. Mr. K K Tyagi (Member)
3. Unit Head of the Company from the respective unit where the complaint has originated (Members)

The Managing Director of the Company shall be responsible to implement the actions recommended by the Internal Complaint Committee.

6. PROCEDURE

- i. Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee within a period of three months from the date of incident and in case of series of incidents, within a period of three months from the date of last incident.
- ii. The Internal Complaints Committee before initiating an enquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation (provided that no monetary settlement shall be made as a basis of conciliation):-
 - o Where a settlement has been arrived, the Internal Complaints Committee shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation.
 - o The Internal Complaints Committee, shall provide the copies of the settlement as recorded to the aggrieved woman and the respondents.
 - o Where a settlement is arrived, no further inquiry shall be conducted by the Internal Complaints Committee.
- iii. The Internal Complaints Committee, shall,
 - o Where the respondent is employee, proceed to make inquiry into the complaint in accordance with the provisions of the service rules applicable to the respondents.
 - o Where both the parties are employees, the parties shall during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.

**A Women or who have had experience in social work or have legal Knowledge.*

- o Notwithstanding anything contained in section 509 of the Indian Penal Code (45 of 1860), the Court may, when the respondent is convicted of the offence, order payment of such sums as it may consider appropriate, to the aggrieved woman by the respondent, having regard to the provisions of section 15 of the Act, regarding determination of compensation.
- o For the purpose of making an inquiry, the Internal Complaints Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters:
 - Summoning and enforcing the attendance of any person and examining him on oath.
 - Requiring the discovery and production of documents, and
 - Any other matter which may be prescribed.
- o The inquiry shall be completed within a period of ninety days.
- o For a transparent and free inquiry, the Internal Complaints Committee, if it is found necessary to do so, may suspend the complainant or the respondent or both from participating in the affairs of the Company for such period as it thinks fit.
- o Where the complaint is made against any member of the Internal Complaints Committee, then such member will not participate in the proceedings of the inquiry or in any meeting of the Committee, till the time inquiry is finished and the recommendation are made by the Committee to the Final Authority.
- iv. During the pendency of an inquiry, on a written request made by the aggrieved woman, the Internal Complaints Committee may recommend certain action to the Final Authority. Final Authority shall implement the recommendations and send the report of such implementation to the Internal Complaints Committee.
- v. On the completion of an inquiry under this Act, the Internal Complaints Committee shall provide a report of its findings to the Final Authority, within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
 - o Where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Final Authority that no action is required to be taken in this matter.
 - o Where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend certain action to the Final Authority as per this Act.

- vi. Where the Internal Complaints Committee arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the Final Authority to take action against the woman or the person who has made the complaint in accordance with the provisions of the service rules applicable.
- vii. Where the Internal Complaints Committee arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Final Authority of the witness to take action against the witness in accordance with the provisions of the service rules applicable.
- viii. Any person aggrieved from the recommendations made by Internal Complaints Committee or non-implementation of such recommendations may prefer an appeal to the Court in accordance with the provisions of the service rules applicable within a period of ninety days of the recommendations.
- ix. For the purpose of this Policy, the Final Authority shall mean Managing Director of the Company.

7. DUTIES OF EMPLOYER

The Employer shall –

- i. Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- ii. Display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Complaints Committee;
- iii. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act and orientation programs for the members of the Internal Complaints Committee in the manner as may be prescribed;
- iv. Provide necessary facilities to the Internal Complaints Committee, as the case may be, for dealing with the complaint and conducting an inquiry;
- v. Assist in securing the attendance of respondents and witnesses before the Internal Complaints Committee;
- vi. Make available such information to the Internal Complaints Committee, as it may require having regard to the complaint;

- vii. Provide assistance to the women if she so chooses to file a complaint in relation to the offence under Indian Penal Code (45 of 1860) or any other law for the time being in force;
- viii. Cause to initiate action, under the Indian Penal Code (45 of 1860) or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;
- ix. Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct;
- x. Monitor the timely submission of reports by the Internal Complaints Committee.
- xi. Keep the proceedings strictly confidential.

8. ANNUAL REPORT

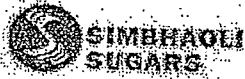
The Internal Complaints Committee shall in each calendar year prepare and submit an annual report to the employer which mentions the number of cases filed, if any, and their disposal under the Act.

9. REVIEW

The Board may in its discretion or on the recommendations of the Internal Complaints Committee or as per the requirements of the applicable laws, review or amend this policy, in whole or in part, from time to time.

10. NOTICE

- i. The copy of this Policy will be made available on the Company's Notice Board/ common server to create awareness among them about their rights against Sexual Harassment.
- ii. In case any member of the Internal Complaints Committee is found accused, the Internal Complaints Committee shall be reformulated immediately.
- iii. The Management and the Internal Complaints Committee for the implementation of this Policy will recognize that confidentiality is important and will respect the privacy of Complainant or Respondent, to the extent reasonably possible.



Management reserves the right to modify or withdraw the Policy at its own discretion but always in line with the directives of Hon'ble Supreme Court of India and other applicable laws of India.

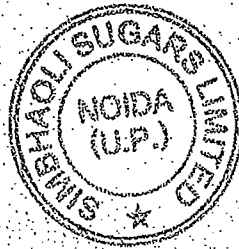
II. EFFECTIVE DATE

This Policy shall be effective from 15th Day of February, 2016.

For Simbhaoli Sugars Limited

A handwritten signature in black ink, appearing to read 'Krishan'.

Krishan Kumar Tyagi
General Manager (Corp. HR)





AMENDEMENT TO POLICY ON THE PREVENTION UNDER THE PROVISIONS OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION, & REDRESSAL) ACT, 2013

The Policy on the prevention under the provisions of sexual harassment of women at workplace (prevention, prohibition, & redressal) act, 2013 of Simbhaoli Sugars Limited dated February 15, 2016 be amended as follows:-

Amendment of
Clause 3

In the scope of the policy, the following para be included after the para under clause 3 as follows:

"This policy may also be applicable to the Simbhaoli Group Companies including all of its subsidiaries and associate companies and other entities and the Board of respective companies may adopt the same policy subject to suitable modifications to be approved in this regard."

Amendment of
Clause 5

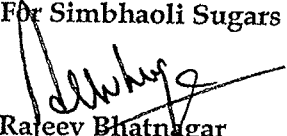
In the Constitution of Internal Complaints Committee, the second para under clause 5 be amended as follows:

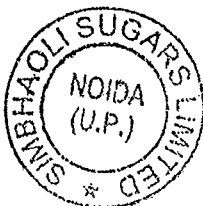
The quorum of the Internal Complaints Committee meeting shall be atleast three members provided the presence of aforesaid Presiding Officer and the non-employee member will be mandatory and also atleast half of the members shall be women.

1. Ms. Gursimran Kaur Mann (Chairperson/ Presiding Officer)
2. Mr. S N Misra (Vice-Chairperson)
3. Mr. Rajeev Bhatnagar (Member)
4. Ms. Harmeet Kaur (Member)
5. Ms. Neha Kohli (Member)
6. Unit Head of the Company from the respective unit where the complaint has originated (Member)

The above amendment shall come into force w.e.f November 07, 2019 by and under the authority of the Board of Directors of Simbhaoli Sugars Limited.

For Simbhaoli Sugars Limited


Rajeev Bhatnagar
Corporate HR Head





AMENDEMENT TO POLICY ON THE PREVENTION UNDER THE PROVISIONS OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION, & REDRESSAL) ACT, 2013

The Policy on the prevention under the provisions of sexual harassment of women at workplace (prevention, prohibition, & redressal) act, 2013 of Simbhaoli Sugars Limited dated April 21, 2026 be amended as follows:-

Amendment of Clause 3	In the scope of the policy, the following para be included after the para under clause 3 as follows: <i>"This policy may also be applicable to the Simbhaoli Group Companies including all of its subsidiaries and associate companies and other entities and the Board of respective companies may adopt the same policy subject to suitable modifications to be approved in this regard."</i>
Amendment of Clause 4	The "Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: a) Physical contact and advances; b) Inappropriate eye contact c) Peeking into Cabins(s)/desk indecent manner. d) Demand or request for sexual favors; e) Sexually colored remarks; f) Showing pornography; g) Other unwelcome physical, verbal or non-verbal conduct of a sexual nature; h) Eve-teasing; i) Unsavory remarks; j) Jokes causing or likely to cause awkwardness or embarrassment; k) Innuendos and taunts; l) Gender based insults or sexist remarks; m) Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls) and the like; n) Touching or brushing against any part of the body and the like; o) Displaying pornographic or other offensive or derogatory pictures, cartoons, pamphlets or sayings; p) Forcible physical touch or molestation and physical confinement against one's will and any other act likely to violate one's privacy.
Amendment of Clause 5	In the Constitution of Internal Complaints Committee, the second para under clause 5 be amended as follows: <i>The quorum of the Internal Complaints Committee meeting shall be atleast three members provided the presence of aforesaid Presiding Officer and the non-employee member will be recommended and also atleast half of the members shall be women.</i>



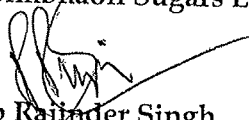
Amendment of Clause 5	1. Ms. Jagriti Sharma (Chairperson/ Presiding Officer) 2. Mr. S N Misra (Vice-Chairperson) 3. Mr. Roop Rajinder Singh (Member) 4. Ms. Neha Kohli (Member) 5. Ms. Sakshi (Member) 6. Unit Head of the Company from the respective unit where the complaint has originated (Member)
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According to the PoSH Act (Sexual Harassment of Women at Workplace Act, 2013), the Chairperson (Presiding Officer) of the Internal Committee (IC) **must be a woman employed at a senior level in the organization.**

At least 50% of the total members must be women. The Human Resource Management of the Company shall be responsible to implement the actions recommended by the Internal Complaint Committee.

The above amendment shall come into force w.e.f April 21, 2026 by and under the authority of the Interim Resolution Professional/Senior Management of Simbhaoli Sugars Limited.

For Simbhaoli Sugars Limited


Roop Rajinder Singh
Corporate HR Head

AMENDMENT TO POLICY ON THE PREVENTION UNDER THE PROVISIONS OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION, & REDRESSAL) Act, 2013

The Policy on the prevention under the provisions of sexual harassment of Women at workplace (Prevention, Prohibition, & Redressal) Act, 2013 of Simbhaoli Sugars Limited dated August 31, 2026 be Amended as follows:-

Amendment in Clause 5	In Constitution of Internal Committee, the Second para under clause 5 be amended as follows: The Quorum of the Internal Complaints Committee meeting shall be at least three members provided the presence of the aforesaid Presiding Officer and the non-employee member will be recommended and also atleast half of the members shall be women. 1. <i>Ms. Jagriti Sharma (Chairperson/Presiding Officer)</i> 2. <i>Mr. S N Misra (Vice Chairperson)</i> 3. <i>Mr. Yogendra Pal Arya (Member)</i> 4. <i>Ms. Neha Kohli (Member)</i> 5. <i>Ms. Sakshi (Member)</i> 6. <i>Unit Head of the Company From the respective unit where the Complaint has originated (Member)</i>
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According to the POSH Act (Sexual Harassment of Women at Workplace Act, 2013), the Chairperson (Presiding Officer) of the Internal Committee (IC) **must be a Women employed at a Senior Level** in the organization.

Atleast 50% of the Total members must be women. The Human Resource Management of the Company shall be responsible to implement the action recommended by the Internal Complaint Committee.

The above amendment shall come into force w.e.f April 21, 2026 by and under the authority of the Interim Resolution Professional/ Senior Management of Simbhaoli Sugars Limited.

For Simbhaoli Sugars Limited


Yogendra Pal Arya
Corporate HR Head