



SHARP INDIA LIMITED

Registered Office & Factory
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16th September 2025

**Circulation of Policy on Prevention of Sexual Harassment at Workplace of
Sharp India Limited.**

Dear All,

We are committed to fostering a safe and respectful work environment for everyone.

In accordance, the Company has updated its Policy on Prevention of Sexual Harassment at Workplace.

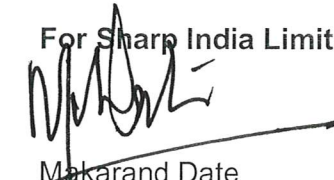
Following is the Internal Committee under the policy.

Member Name	Role	Email
Mrs. Sukhada Bapat	Presiding Officer	Kanchanb933@gmail.com
Mrs. Aparna Salunke	Member	poojamsalunke43@gmail.com
Mr. Arvind Shinde	Member	arvindshinde21.as@gmail.com
Adv. Akshaya Kulkarni	External Member	akshaya.kulkarni19@gmail.com

The Copy of abovementioned policy is enclosed for your reference.

Regards,

For Sharp India Limited


Makarand Date
Managing Director
Chandranil Belvalkar
Company Secretary

Encl: As above



SHARP INDIA LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. INTRODUCTION

This policy is framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“the POSH Act”) and the relevant Rules framed thereunder. The objective is to uphold the dignity, safety, and equality of all employees by preventing and redressing acts of sexual harassment at the workplace.

This policy applies to all workplaces under the control of SHARP INDIA LIMITED, including physical offices, remote work environments, virtual platforms, and any location where work-related activities are conducted. It covers all categories of employees—permanent, temporary, contractual, interns, trainees, consultants—as well as visitors, clients, and service providers.

2. ZERO TOLERANCE DECLARATION

SHARP INDIA LIMITED adopts a zero-tolerance stance towards sexual harassment. Any act of sexual harassment, as defined under this policy and the POSH Act, shall invite strict disciplinary action, including but not limited to termination of employment.

The organization is committed to fostering a culture of mutual respect, dignity, and accountability. All employees are expected to uphold these values and contribute to a safe and inclusive work environment.

3. SCOPE

This policy applies to all employees of the Company, including those employed on a permanent, temporary, contractual, part-time, or retainer basis and includes those who are appointed at any office of the Company in India. It also includes interns, trainees, volunteers, consultants, and service providers engaged in work-related activities.

The policy extends to all workspaces, including office premises, work-related travel, off-site meetings and events, and virtual platforms such as email, messaging apps, and video conferencing tools.

It applies to all complaints of sexual harassment made by one employee against another, irrespective of whether the incident occurred within or outside the workplace premises.

4. SEXUAL HARASSMENT

4.1 As prescribed by the Act, sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):

- a. Physical contact and advances, such as inappropriate touching, groping, or any form of physical intimacy that is not consented to.
- b. A demand or request for sexual favours, whether verbal, written, or implied.
- c. Making sexually coloured remarks, including suggestive or derogatory comments.
- d. Showing pornography through any medium.
- e. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

4.2 While sexual harassment is not limited to the above-mentioned points and it includes:

- a) Unwelcome sexual advances.
- b) Making unwanted communication through social networking sites, emails, text messages; for sending any kind of a message that is not favourable to a professional relationship and/or are deemed to be offensive by the recipient of such messages.
- c) Any verbal conduct like the use of sexually coloured remarks, innuendoes, derogatory comments, offers of promotion / employment in exchange for sexual favours, graphic comments on a fellow women colleague's physical attributes. Sexual harassment also includes addressing women colleagues by terms such as "babe" "honey", "darling", "sweetheart" etc.
- d) Any unwelcome/ unwanted physical contact of a sexual nature. This includes sexually suggestive or offensive touching, deliberate brushing against another's body. Cornering, blocking, stalking, staring, pinching, fondling etc of a woman co-worker is also included type of sexual harassment.
- e) Any kind of unwanted visual conduct/ manner such as staring/ leering or displaying any kind of sexually suggestive indecent explicit posters, photography, graffiti, drawings, gestures, inappropriate obscene text messages, emails, letters notes, internet information etc.
- f) Emotional & psychological harassment in the form of threats and insinuation that the women employee's employment or salary or promotion or appraisal or

any other condition of employment will be adversely affected if she does not submit to the sexual demands.

g) Any kind of implied or explicit –

- I. Promises of preferential treatment in employment
- II. Threat of detrimental treatment in employment
- III. Threat about present or future employment status, may amount to sexual harassment.
- IV. Interference with or creating an intimidating or offensive or hostile work environment
- V. Humiliating treatment to affect health or safety of a woman co- worker.

5. GENDER NEUTRALITY

While the POSH Act specifically protects women, SHARP INDIA LIMITED extends protection to all employees regardless of gender identity or sexual orientation.

The term “Aggrieved Employee” shall be used in internal documentation to reflect inclusivity, while statutory references to “Aggrieved Woman” shall be retained where legally required.

No employee shall face discrimination or denial of redressal on the basis of gender, gender identity, or sexual orientation.

6. INTERNAL COMMITTEE (IC)

6.1 Constitution

The Company shall constitute an Internal Committee (IC) at each workplace, in accordance with the provisions of the POSH Act.

6.2 Composition

- a. A senior woman employee shall serve as the Presiding Officer.
- b. At least two members shall be nominated from among the employees, preferably individuals committed to the cause of women or possessing experience in social work or legal knowledge.
- c. One external member shall be nominated from a non-governmental organization or shall be a person familiar with issues relating to sexual harassment.
- d. At least fifty percent of the Internal Committee members shall be women.

- e. The Presiding Officer and other members shall hold office for a term of three years from the date of nomination.

6.3 Committee Details (Illustrative)

Member Name	Role	Email
Mrs.Sukhada Bapat	Presiding Officer	Kanchanb933@gmail.com
Mrs.Aparna Salunke	Member	poojamsalunke43@gmail.com
Mr.Arvind Shinde	Member	arvindshinde21.as@gmail.com
Adv.Akshaya Kulkarni	External Member	akshaya.kulkarni19@gmail.com

7. COMPLAINT MECHANISM

7.1 Filing a Complaint

1. Any aggrieved employee may submit a written complaint to any member of the Internal Committee. Complaints may also be submitted electronically or through designated feedback forums or whistleblower mechanisms.
2. The complaint must be filed within three months from the date of the last incident. The Internal Committee may extend this period if sufficient cause is shown.
3. If the aggrieved employee is unable to file the complaint due to physical or mental incapacity, or in the event of death, a legal heir or authorized representative may file the complaint on their behalf.

7.2 Inquiry Procedure

1. All the proceedings conducted by the Internal Committee will be confidential.
2. The Internal Committee, upon receiving the complaint from the aggrieved woman, shall send a copy of the complaint to the Respondent, within a period of 7 days.
3. The Respondent shall file a reply in writing to the complaint within a period not extending 10 working days from the date of receipt of the copy of the complaint from the Internal Committee.
4. The Internal Committee shall call upon any documents like copies of emails/bills/credit card statements etc which the Internal Committee deems fit to serve as documentary proof.
5. The Internal Committee may before initiating the inquiry can, at the request of the aggrieved woman, take steps to resolve the matter between the two parties through conciliation; provided that there is no monetary settlement as a result of the conciliatory proceedings. In case of a settlement, the Internal Committee shall record it in writing.

6. The Internal Committee will proceed with the inquiry where no settlement is arrived at through conciliation.
7. Both the parties will have a right to be heard and produce evidence to support their claim.
8. During the proceeding before the Internal Committee, the parties shall not be allowed to bring in their Advocate to represent them at any stage of the inquiry proceeding.
9. The decision of the Internal Committee will be conveyed to the two parties in writing.

8. REDRESSAL

8.1 Interim Relief

During the pendency of the inquiry, the IC may recommend interim measures such as:

1. Transfer of either party to another workplace.
2. Grant of paid leave to the aggrieved employee for up to three months.
3. Temporary suspension of the respondent or any other relief deemed appropriate.

8.2 Compensation

If the IC determines that compensation is warranted, it shall consider:

1. Mental trauma, pain, suffering, and emotional distress.
2. Loss of career opportunities.
3. Medical expenses incurred.
4. Income of the respondent while determining the quantum and mode of compensation.

8.3 Appeal

Any person aggrieved by the recommendations of the IC or the non-implementation thereof may file an appeal before the appropriate legal authority within ninety days from the date of the recommendation.

9. DUTIES OF THE EMPLOYER

The Company shall:

1. Ensure a safe and respectful working environment.
2. Display the constitution of the Internal Committee and penal consequences of sexual harassment prominently.

3. Conduct regular training and awareness programs for all employees.
4. Organize workshops for Internal Committee members to keep them updated on legal developments.
5. Provide full support to the Internal Committee during investigations.
6. Assist the aggrieved employee in filing complaints under applicable laws.
7. Treat sexual harassment as misconduct under service rules and initiate disciplinary action accordingly.

10. MISCELLANEOUS CLAUSES

1. False or Malicious Complaints:

If the IC concludes that a complaint was made with malicious intent, disciplinary action may be taken against the complainant in accordance with the Code of Conduct/Disciplinary Action Policy of the Company.

Total time for the investigation should not exceed 1 month from date on which the complaint was received by the Internal Committee.

The IC shall submit a report with its recommendation to the Chief HR/CEO for further appropriate action.

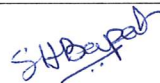
2. External Complaints:

In cases where the Internal Committee is not constituted or the complainant prefers, complaints may be made to the Local Committee (LC) as per the POSH Act.

3. Training and Sensitization:

All employees shall undergo periodic training and awareness programs. The policy shall be displayed prominently and included in induction materials.

10. AMENDMENT HISTORY (Annexure)

Date of Amendment	Summary of Changes	Approved By
13-Sept -2025	Policy amendment as per revised guideline under She-Box	 Mrs.Sukhada Bapat Presiding Member