



POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT

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BACKGROUND:

The Company believes that all employees, including any other Stakeholders who have been dealing with the Company, have the right to be treated with respect and dignity. Sexual Harassment in any form is an offence and is, therefore, punishable, as well. At Rajoo, we have zero – tolerance for sexual harassment. Rajoo Engineers Limited is committed to providing a work environment free from any form of Sexual Harassment.

OBJECTIVE:

Issuing a policy statement defining and to prevent Sexual Harassment and laying down the procedures for curbing such tendencies and to provide for punishment and prosecution of wrongdoers and addressing issues related to Sexual Harassment promptly, confidentially and sensitively.

DEFINITION:

“Aggrieved Person” means a person about workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

“Company” means Rajoo Engineers Limited.

“Employee” means a person employed at a workplace for any work on regular, temporary, *ad hoc* or daily wages basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

“Internal Complaints Committee” means a committee constituted by Company as per this Policy.

“Respondent” means a person against whom the aggrieved person has made a complaint.

“Sexual harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

- Physical contact and advances; or
- A demand or request for sexual favours; or
- Making sexually coloured remarks; or

- Showing pornography or other offensive or derogatory pictures, cartoons,
 - representations, graphics, pamphlets or sayings; or
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature; or
 - Following circumstances amongst other events mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behaviour of sexual harassment:
 - Implied or explicit promise of preferential treatment in their employment;
 - Implicit or explicit threat of detrimental treatment in their jobs;
 - Implied or explicit threat about their present or future employment status;
 - Interfering with their work or creating an intimidating or offensive or hostile work environment; humiliating treatment likely to affect their health or safety.
 - Humiliating treatment is likely to affect the health and safety of the aggrieved person.
- In addition to the instances mentioned hereinabove, any other acts or behaviour, which outrages the modesty of a female employee, will be considered as sexual harassment.

“Workplace” includes any department, organisation, undertaking, establishment, enterprise, institution, and office or branch unit. Any place visited by the employee arising out of or during employment including transportation provided by the employer for undertaking such journey.

INTERNAL COMPLAINTS COMMITTEE:

Every complaint received shall be forwarded to the Internal Complaints Committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose. Internal Complaints Committee has been constituted of the following members as nominated by the Company:

- A woman employee employed at a senior level amongst the employees shall act as Presiding officer of the committee.
- Not less than 2 members from amongst employees preferably committed to the cause of women OR who have had experience in social work OR have legal knowledge.
- One member shall be from amongst Non-governmental organisations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.

The Name of the Members of the Internal Complaints Committee is as per **Annexure A** of this Policy, and any change in such composition shall be effected in the system. At least half the total members of the Committee have to be 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.

COMPLAINT REDRESSAL MECHANISM:

Any aggrieved person may make, in writing, a complaint of sexual harassment to the committee giving details of the sexual harassment meted out to her/him in writing and within a period of 3 months from the date of incident and in case of a series of events, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the Internal Complaints Committee.

- The Presiding Officer or any Member of the Internal Complaints Committee can render reasonable assistance to the person for making a complaint in writing, in case they are unable to do so.
- On receipt of the complaint, the Internal Complaint Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the Complainant and Respondent within 3 days of receiving the complaint. The Internal Complaints Committee shall follow the principle of Natural Justice while handling such complaints.

Where the aggrieved person is unable to make a claim on account of their physical incapacity, a complaint may be filed by:-

- Relative or friend; or
- A special educator' or
- The qualified psychiatrist or psychologist; or
- The guardian or authority under whose care they are receiving treatment or care; or
- Any person who has knowledge of the incident jointly with any of the above.

Where the aggrieved person for any other reason is unable to make a complaint, a complaint may be filed by anyone who has knowledge of the incident, with their written consent. Where the aggrieved person is dead, a complaint may be lodged by any person who becomes aware of the incident, with the written consent of their legal heir.

- Internal Complaints Committee on receipt of such written complaint, if required, asks the aggrieved person to furnish additional information about the alleged harassment.
- The Complainant or person authorised on their behalf as per above provision, shall make a complaint to the Internal Complaints Committee through the following mode:
 - A copy of complaint along with supporting documents and names and address of witness shall be sent to Internal Complaints Committee at kcdoshi@rajoo.com.
 - On receipt of such complaint, Internal Complaints Committee shall provide a copy along with supporting documents of such complaints to the respondent within 7 working days.
 - Respondent shall file a reply within 3 working days of receipt of the complaint along with a list of documents, names and addresses of witnesses.
 - Internal Complaint Committee shall investigate in detail into the matter of the complaint. The Internal Complaint Committee shall have the right to call the person against whom the claim is made or any other witnesses as and when necessary.
 - Internal Complaint Committee shall have the right to terminate the enquiry or give an ex-parte decision on the claim, if the Respondent or Complainant remains absent for 3 consecutive hearings, without sufficient cause.
 - The Internal Committee must complete its investigation within a period 30 days.
 - The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
 - For conducting the enquiry, the quorum of the Internal Complaints Committee shall be of 3 members including the Presiding Officer.
- The Internal Committee may before initiating an inquiry, and at the aggrieved person's request, attempt to settle the matter through conciliation. However, Internal Complaints Committee shall ensure that:
 - Monetary settlement will not be made as a basis of conciliation.

- Where an agreement has arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.
- Where a settlement is reached as mentioned hereinabove, no further enquiry shall be conducted by the Internal Complaints Committee.
- The Internal Complaints Committee may during such investigation may exercise the power of a civil court, vested in it, in respect of:
 - Summoning and enforcing the attendance of any person and examining him on oath;
 - Requiring discovery and production of documents;
 - Any other prescribed matter

ACTION AGAINST THE RESPONDENT:

Where the Complaints Committee arrives at the conclusion that the allegation against the defendants been proved, it shall recommend to the employer to take action which may include the following:

- Formal apology.
- Counselling.
- Conciliation.
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence.
- Stoppage of increment with or without cumulative effect;
- Reduction in rank;
- Any other action that the Board may deem fit and proper;
- Filing of a complaint before the relevant statutory / police authorities / court of law.

PROTECTION TO COMPLAINANT/ VICTIM:

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

The Company will ensure that victim or witnesses are not victimised or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

CONFIDENTIALITY:

All proceedings, including the statements and other material adduced as evidence before the Committee, shall be strictly confidential. The Committee shall take all steps to ensure that the parties before it and their representatives shall maintain strict confidentiality in all respects.

Divulgence of information by way of any direct or indirect sharing of such information with persons not directly related to the complaint without good reason can result in disciplinary action against the concerned committee member.

OBLIGATION OF THE MANAGEMENT:

The Management of the Company shall provide all necessary assistance for the purpose of ensuring full, efficient and speedy implementation of this policy.

THIRD PARTY HARASSMENT:

Where sexual harassment occurs as a result of an act or omission by any third party or an outsider, the company shall take all steps necessary and reasonable to assist the affected persons regarding support and preventive action.

PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE:

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 a claim knowing it to be false, or the injured woman or any other person making a claim has produced any forged or misleading document then it may recommend to the employer to take disciplinary action in accordance with the provisions of the service rules applicable against the complainant.

MISCELLANEOUS:

- The company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employee.
- The Internal Complaint Committee shall prepare an Annual Report with the following details and shall submit the same to the Company to include in its Annual Report:
 - Number of complaints of sexual harassment received during the year;
 - Number of complaints disposed of during the year;
 - Number of cases pending (including for more than 60 days, if any);
 - Nature of action taken by the employer; and
 - Any other information as may be required under the various laws.

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.

ANNEXURE – A

Composition of Internal Complaints Committee

Sr. No.	Name	Designation	Membership
1.	Ms. Khushboo C. Doshi	Managing Director	Presiding Officer
2.	Ms. Jignasa Shingrakhiya	Manager - HR	Member
3.	Mr. Pravin Dave	Sr. Executive - HR	Member
4.	Mr. Jayesh V. Kamdar	External Member	