

KAJARIA CERAMICS LIMITED

Policy on Prohibition, Prevention & Redressal of Sexual Harassment of Women at Workplace

1. PREAMBLE

Kajaria Ceramics Limited ('the Company') is committed in providing 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.

2. OBJECTIVE

This Policy has been framed with a view to:

- Promote a workplace based on equality and respect.
- Provide a safe and congenial work environment.
- Awareness & sensitization about prevention of sexual harassment at the workplace.
- Prevent and prohibit sexual harassment.
- Provide formal and informal mechanism for redressal in case of complaint of sexual harassment at the workplace.
- Define the implications and outcome of sexual harassment.
- Ensure protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

3. SCOPE

The Policy is applicable at the Company and its subsidiaries / associate companies. This Policy shall apply to all persons employed at the workplace for any work of regular, temporary, ad-hoc or daily wage basis, directly or through an agent/contractor, including persons working on a voluntary basis and also apprentices, trainees, probationers, agent, including consultants of the Company.

The Company will also not tolerate sexual harassment if engaged in by clients, suppliers or by any other business associates. The workplace includes:

- All offices or other premises where the Company's business is conducted.
- All Company related activities performed at any other site away from the Company's premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

4. DEFINITIONS

SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR:

'Sexual Harassment', includes any unwelcome sexually determined behaviour, direct or by implication, and includes physical contact and advances, a demand or request for sexual favours, sexually coloured remarks, showing pornography, any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Sexually Oriented behaviour shall mean and include but not limited to the following:

- Physical Contact or advances;
- A demand or request for sexual advances;
- Making sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

"Unwelcome sexually determined behaviour" includes but is not limited to:

- Subjecting another person to an unwelcome act of physical intimacy including grabbing, brushing, touching, including sexual flirtations, advances or propositions.
- Making any unwelcome remark with sexual connotations like sexually explicit, remarks, cracking jokes or using sentences with sexual connotations or making sexist remarks etc.
- Showing any sexually explicit visual material in the form of pictures / cartoons / pin- ups/ calendars / screen-savers on computers / any offensive written or electronic material /including pornographic.
- Engaging in any other unwelcome conduct of a sexual nature, verbal or even nonverbal, staring to make the other person uncomfortable, making offensive gestures, etc.
- Sending unwelcome communication of a sexual nature, through e-mail, letter, mobile technology or any other form of written or electronic communication, exhibiting conduct of a sexual nature.
- Making an unwelcome demand or request whether directly or by implication for sexual favours and/or making it a condition of employment / payment of wages / increments /promotion / preferential treatment / threat to detrimental treatment in employment /threat to current or future employment status or similar act.
- Where any person requests sexual favours from any other person in exchange for actual or promised job benefits such as favourable reviews, salary increases, promotions, increased benefits or continued employment or threatens to terminate any such person for non-co-operation.
- Where any person intrudes into the private life of employees or persistently asks them out.
- Where any employee(s) make(s) sexual epithet, jokes, written or oral references to sexual conduct, and/or gossip regarding one's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable.
- Behaviour which creates an environment that is intimidating, hostile, offensive, humiliating for women employee.

WORKPLACE:

Any place where working relationship and/or employer-employee relationship between the Company and the person exists. This includes the Company's premises (including transit houses & guest houses) and any place visited by the employee arising out of or during the course of employment including transportation provided by the Company for undertaking such a journey.

AGGRIEVED PERSON:

In relation to workplace, a person of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

RESPONDENT:

Against whom the aggrieved person has made a complaint of Sexual Harassment. It is specifically provided that Sexual Harassment should not be confused with simple friendly behaviour, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is an unwelcome act.

5. PREVENTION OF SEXUAL HARASSMENT

No person shall be subjected to sexual harassment at any work place. The following circumstances among other circumstances if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

- i. Implied or explicit promise of **preferential** treatment in the person's employment/ promotion; or
- ii. Implied or explicit threat of **detrimental** treatment in the person's employment/ promotion; or
- iii. Implied or explicit threat about the person's **present or future** employment/ promotion status; or
- iv. Interferes with work or creating **an intimidating or offensive or hostile** work environment for the persons; or
- v. Humiliating **treatment likely to affect** the person's **health or safety**.

6. RIGHTS AND RESPONSIBILITIES OF EMPLOYEES

- Every employee of the Company shall be entitled to a work environment with dignity and free from sexual harassment.
- Every employee of the Company shall be entitled to complain against Sexually Oriented Behaviour to which he/she was subject to or which was targeted at him/her, to the Internal Committee of the Organization constituted or re-constituted as per this policy.
- Every Employee of the Company may promptly report any incident of Sexual Harassment that comes to his/her knowledge to the Presiding Officer of Internal Committee. If the Presiding Officer is not reachable despite reasonable efforts or if she does not acknowledge the complaint within 3 working days, then other members of Internal Committee. However, in no circumstances, complaint or proceedings of the complaint shall be marked to any other person apart from Internal Committee.

7. INTERNAL COMMITTEE

An Internal Committee is formed pursuant to the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The names and contact details of the members of the Internal Committee are given in the Annexure-1, which are subject to change by the Board of Directors of the Company, from time to time. If a member of the Internal Committee who is an employee of the Company and when she/he ceases to be an employee of the Company, then she/he will also cease to be a member of the Internal Committee.

The Internal Committee will cover all the manufacturing locations and offices of the Company (including its subsidiaries/associate companies) in India.

8. POWERS AND DUTIES OF THE INTERNAL COMMITTEE

The Internal Committee will receive the complaint(s) on Sexual Harassment, inquire into the complaint(s) and submit the findings on the complaint(s) in the manner mentioned here-in-below in this Policy. The Internal Committee while doing enquiry into the complaint(s) shall have the same powers as are vested in a civil court the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the any matter, namely: (a) summoning and enforcing the attendance of any person and examining her/him on oath; (b) requiring the discovery and production of documents; and (c) any other matter which may be prescribed.

9. PROCEDURE

A. INFORMAL RESOLUTION OPTION

- When an incident of Sexual Harassment occurs, the victim of such conduct can communicate his/her disapproval and objections immediately to the harasser and request the harasser to behave decently.
- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, he/she can bring his/her concern to the attention to the Internal Committee for redressal of his/her grievances.

B. COMPLAINTS MECHANISM

- Any employee of the Company will have a right to lodge a complaint concerning sexual harassment against an employee of the Company.
- Such a complaint shall be made in writing within a period of three months from the date of incident, mentioning the name (with contact number), department, division and location of the complainant, to enable the Internal Committee to contact him/her and resolve the matter.
- The time limit for making the complaint may be extended upto a further period of three months, if the Internal Committee is satisfied that the circumstances were such which prevented the complainant from filing the complaint within that period.
- The complainant, if desires could be facilitated in writing the complaint, by an Internal Committee's member.
- Where the aggrieved woman is unable to make the complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint on her behalf.

- The Internal Committee may then try to resolve the matter with conciliation in his/her presence between the complainant and the accused where the severity of the case allows.

Provided that no monetary settlement shall be made as a basis of such conciliation where the matter is not resolved by excising informal resolution option or the complainant denies excising such option or conciliation between the complainant and the accused proves fruitless, Internal Committee shall proceed for inquiry.

- The inquiry shall be completed as soon as practicably be possible not exceeding 90 (Ninety) days from the date of receipt of the complaint and inquiry report after completion of such inquiry shall be made within 10 days of completion of the enquiry.
- The Presiding Officer of the Internal Committee shall then proceed to convene a meeting of the members of the Internal Committee as soon as possible and give opportunities to the complainant to present his/her case and the respondent to give his/her version. The Internal Committee may examine witness from both the sides and also give opportunity of cross-examining of the witness. Documents, if any, produced by the parties may be taken on record. Neither the complainant nor the respondent is allowed to bring in any legal practitioner to represent them in their case at any stage before the Internal Committee.
- In case of a complaint against any member of the Internal Committee, then the said member of the Internal Committee will not participate in any of the inquiry/proceedings of the Internal Committee with respect to the said complaint.
- The Internal Committee shall then submit the enquiry report in writing to the Chairman/Vice Chairman/Managing Director of the Company within 10 (Ten) days from the conclusion of the enquiry, explaining the findings and recommendations of the Internal Committee.
- The Chairman/Vice Chairman/Managing Director will instruct HR- Head to take corrective action(s) on the recommendations of the Internal Committee and to keep the complainant informed of the same.
- Corrective action(s) may include any of the following:
 - a) Written warning to the perpetrator and a copy of it will be maintained in the employee's file.
 - b) To deduct notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved person or to her legal heirs as may be determined.
 - c) Such allegations of sexual harassment when proved, shall affect the annual review of the harasser.
 - d) Change of work assignment / transfer for either the perpetrator or the victim.
 - e) Suspension or termination of services of the employee found guilty of the offence.

In case the complaint is found to be false and malicious, it shall be viewed seriously and the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management of the Company.

10. ASSURANCE AGAINST RETALIATION

This Policy seeks to encourage all employees to express freely, responsibly and in an orderly way opinions and feelings about any concerns, issues, grievances or complaints of sexual harassment. Retaliation against person(s) who report or provide information about sexual harassment or behavior that might constitute sexual harassment is also strictly prohibited. Any act of reprisal, including internal interference, coercion, and restraint, by an employee, violates this policy and will result in appropriate actions.

In the event, the complainant being an employee and the respondent being his/her manager, the Internal Committee may during the pendency of inquiry and even after such inquiry, if the manager is found to be guilty, recommend to the management to:

- a) Change the manager of the aggrieved person; or
- b) Transfer the aggrieved person or the respondent to any other workplace; or
- c) Grant leave to the aggrieved person upto a period of three months; or
- d) Grant such other relief to the aggrieved person, as may be prescribed under the applicable laws.

11. OBLIGATIONS OF THE MANAGEMENT

The Management of the Company shall provide all necessary assistance for the purpose of ensuring an effective and speedy functioning of the Internal Committee and shall implement the decisions in an expeditious manner.

12. CONFIDENTIALITY

- a) 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.

To protect the interests of complainant, respondent (until proven guilty) and witness, confidentiality will be maintained by members of the Internal Committee, parties to the complaint and all other persons who come in connection with the proceedings of the complaint, throughout any inquiry process and thereafter to the extent practicable and appropriate under the circumstances.

- b) Where any person entrusted with the duty to handle or deal with the complaint, inquiry or recommendations or actions to be taken under the policy contravenes the provisions of clause (a) above, he/she shall be liable to penalty as may be prescribed by the Internal Committee.

13. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of inquiries and other relevant materials shall be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes including legal obligations.

14. 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 reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaint(s) 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.

15. THIRD PARTY HARASSMENT

In case of third party's sexual harassment, the Internal Committee will actively assist and provide all its resources to the complainant in pursuing the complaint.

16. SAVINGS

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the respondent under any other provision of civil or criminal law.

17. DISCLOSURE

Disclosure of this Policy and details of complaint, if any, under this Policy will be made as per the applicable laws.

18. REVIEW/AMENDMENT

The Board of Directors of the Company may review, amend, abrogate, modify or revise any or all clauses of this Policy, from time to time. However, amendments in the applicable laws shall be binding, even if not incorporated in this Policy.

This Policy has been revised by the Board of the Company at their meeting held on January 30, 2026.

Details of the Internal Committee

Sr. No.	Name	Designation	Category	E-mail	Contact Number
1.	Ms. Nisha Bisht	Presiding Officer	Internal Member	nishabisht@kajariaceramics.com	01126946409 / 9990409931
2.	Ms. Isha Sharma	Member	Internal Member	ishasharma@kajariaceramics.com	01126946409 / 9818765514
3.	Mr. Sachin Saxena	Member	Internal Member	sachinsaxena@kajariaceramics.com	01126946409 / 9717177304
4.	Ms. Ritu Goyal	Member	External Member	ritu@nakslaw.com	9582004704