



**RAW EDGE INDUSTRIAL SOLUTIONS LIMITED**  
**CIN No: L46201MH2005PLC240892**

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## **ANTI SEXUAL HARASSMENT POLICY**

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Registered Office: Address: B1-401, B Wing, Boomerang, Chandivali Farm Road,  
Andheri East, Mumbai, Mumbai City MH- 400072

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## PURPOSE & OBJECTIVE

**Raw Edge Industrial Solutions Limited** (the "Company") is committed to fostering a safe, respectful, and inclusive workplace. This policy aims to prevent and address sexual harassment in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013, while extending protection to all genders, ensuring a harassment-free workplace.

## Requirement & Scope

This policy applies to:

- All employees (permanent, contractual, temporary, trainees).
- Third parties interacting with the Company (vendors, consultants, visitors).
- Workplace, including physical premises, virtual and remote work settings, and any location associated with work-related activities (e.g., travel, online meetings).

## Definitions

### Complainant:

Any individual who alleges to have been subjected to sexual harassment at the workplace.

### Sexual Harassment:

Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (Whether directly or implication) namely:-

- (i) Physical contact and advances;
- (ii) A demand or request for sexual favours;
- (iii) Making sexually coloured remarks;
- (iv) Showing pornography; or
- (v) Any other unwelcomed physical, verbal or non-verbal conduct of sexual nature

### Respondent:

A Respondent means the person against whom charges or complaint has been made or lodge.

### Workplace:

Includes Company premises, vehicles, client sites, and virtual settings like online meetings or emails.

### Complaint Redressal Committee/ Internal Complaints Committee:

As per the requirement of provisions of "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013, Company has constituted Internal Complaints Committee for protecting, prevention and redressal of sexual harassment of woman. The constitution of Internal Complaints Committee is as below:

- Mrs. Lekha Dey - Chairperson/ Presiding officer
- Mr. Bimalkumar Rajkumar Bansal -Member
- Mr. Bhavin Patel -Member



The company have any woman employees at its corporate office only.

In order to cover all the locations of the Company under this policy, Mr. Manohar Thakur will cooperate with the ICC Committee

### **Redressal Process:**

Any aggrieved individual can make a complaint in writing, a complaint of Sexual Harassment to the Internal Complaints Committee (ICC), with in a period of three months form the date of incident and in case of series of incidents, within a period of three months from the date of last incident. Provided where such complain cannot be made in writing, the Presiding officer or any member of the Internal Complain Committee, as the case may be shall render all reasonable assistance to the Individual for making the complaint in writing. The ICC, may extended the time limit to further three months, if aggrieved person requested in writing to the ICC and satisfied that the circumstances were such which prevented the Individual from filing a complaint within the said period.

When aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise then following person can lodge complaint on behalf of her:

- His/her legal heir
- His/her friends/ relatives
- any other person who has knowledge of the incident, with the consent of an aggrieved Individual
- any officer of the National or State Woman Commission

An aggrieved Individual can lodge complaint in writing as per Annexure 1 to this policy. After filing the required details an aggrieved woman can submit the complaint to member of ICC or representative of particular location or can submit electronically by sending e-mail on **info@rawedge.in**, any oral complaint cannot be accepted under this policy. The Complainant shall submit the complaint along with supporting documents and details of the alleged incident(s), the name of the Respondent and names and addresses of the witnesses, if any.

- The committee will maintain records of the complaints received and keep the identity of complainant confidential.
- The Committee shall hold meeting and start inquiry into the complaint within Seven days from the receipt of complaint. At the first meeting Committee members shall hear the Complainant and record his/her allegations. The Complainant can also submit supporting evidence in regards to her complaint to the Committee.
- After recording statement of Complainant, Committee will call the person against whom complaint is made and opportunity of being heard is to being given to the respondent.
- After hearing both the Complainant and Respondent if the complaint does not fall under the Sexual Harassment as define aforesaid, the same will be disposed. If Committee is found that complaint is false then appropriate disciplinary action will be taken against the Complainant as decided by the management.

**Inquiry:**

After receiving complaint and recording statement and evidence from the Complainant Committee would start inquiry and communicate the same to the person against whom the complaint is lodge.

Copy of the allegations shall be forwarded to the person against whom complaint is made.

The Complainant or the person against whom complaint is made if desires to call any witness in the particular case then they can request the same to the Committee in writing.

The Complainant or the person against whom complaint is made wishes or desires to place any documentary evidence in the case then they have to provide original copy of the said document to the Committee.

The Committee shall call upon the witness as requested by the complainant and respondent.

During the inquiry Committee shall keep in view that reasonable opportunity of being heard is given to both the parties i.e. complainant and the person against whom the complaint is made.

Committee shall complete the inquiry within the period of three months and submit its report and recommendation to the Head HR of RAW EDGE INDUSTRIAL SOLUTIONS LIMITED within ten days of completion of inquiry. Inquiry report shall also be communicated to both complainant and the person against whom complaint is made.

Head HR will take necessary actions as recommended by the Committee or as per the guidelines issued by the Supreme Court of India or as per the provisions of The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

**Penal Provisions:**

If the Committee finds that Complaint which is made is under the preview of Indian Penal Code then Committee will record the said fact in its report and management of the Company will lodge the Police Complaint in this regard for further proceeding.

ICC Committee may recommend the disciplinary action under The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act, 2013 against the person against whom the complaint is made, if the said person is found guilty in the proceeding. Apart from this, the Management of the Company may take additional actions as may arise under the Indian Penal Code.

Section 74 of the Bharatiya Nyaya Sanhita, 2023, deals with Sexual Harassment. Any case falling under this section is a cognizable offence, which means that a police officer may arrest the accused without a warrant and initiate an investigation into the matter.

Any man Sexual Harasses someone shall be guilty.

Any man who commits offence of Sexual Harassment as described in clause (i) or clause (ii) or clause (iii) and found guilty for the same shall be punished with rigorous imprisonment for a term which may extended to three years, or with fine, or both under the privileged law.



Any man who commits offence of Sexual Harassment as described aforesaid in clause (iv) shall be punishable with imprisonment of which may extended to one year, or with fine, or with both under the privileged law.

Apart from the above, acts of Sexual Harassment may also constitute offences under the Bharatiya Nyaya Sanhita, 2023, including Section 73 (Assault or use of criminal force on a woman with intent to outrage her modesty), Section 74 (Voyeurism), Section 75 (Stalking), Section 63 and 64 (Rape and punishment for rape), and Section 79 (Word, gesture or act intended to insult the modesty of a woman).

**Reporting:**

The Company shall give the details of the number of complaints received and disposed off by the ICC under Sexual Harassment Act, 2013 in the Annual Report of the Company

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(This Policy is approved by the Board of Directors at their meeting held on 02<sup>nd</sup> May, 2025 and shall be effective from 02<sup>nd</sup> May, 2025)