

Policy on Prevention of Sexual Harassment of Women at Workplace

(Revised and adopted by the Board of Directors in their Meeting held on October 31, 2026)

1. Introduction

Greenleaf Envirotech Limited ("Company") is committed to providing a safe, secure, and dignified work environment for all employees.

This Policy is framed as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and Rules, 2013. Protection from sexual harassment and the right to work with dignity are fundamental human rights recognized globally.

2. Applicability

This policy shall be titled as the "Policy on Prevention of Sexual Harassment of Women at Workplace" and shall be applicable to all employees (hereinafter defined in Clause 4 of this Policy.) of the Company.

3. Objective

The objectives of this Policy are to:

- To provide protection against sexual harassment at the workplace.
- To ensure a safe working environment irrespective of gender.
- To define processes for prevention, reporting, inquiry, and redressal of complaints.
- To create awareness and ensure zero tolerance for sexual harassment.

4. Definitions:

"Company" means Greenleaf Envirotech Limited.

"Act" Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 (read with amendments, if any);

"Rule/s"Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules 2013

"**Aggrieved woman" or "Complainant Employee ('CE')" means-**

(i) in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent;

(ii) in relation to a dwelling place or house, a woman of any age who is employed in such a dwelling place or house;

"Respondent" or "Respondent Employee ('RE')" Respondent means a person against whom a complaint of sexual harassment has been made by the aggrieved woman under this policy.

"**Employee**" means a person employed at the workplace, for any work on a regular,

temporary, ad-hoc or daily wage 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 coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

"Employer" Employer means A person responsible for management, supervision, and control of the workplace.

Here, "management" includes the person or board or committee responsible for formulation and administration of polices for such organisation.

"**Workplace**" means Premises, locations, establishments, enterprises, institutions, offices, branches or units established, subsidiaries which are controlled by the Company. Places visited by the Employee arising out of or during employment including official events, accommodation, and transportation provided by the employer for undertaking a journey.

"Sexual Harassment" Sexual harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals within the course of his/ her work who is not employed by the Company. It includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:

(a) Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
   (i) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
   (ii) Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation.
   (iii) Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation,
   (iv) physical confinement and /or touching against one's will.
   (v) Demand or request for sexual favors.
   (vi) Sexually colored remarks or remarks of a sexual nature about a person's clothing or body.
   (vii) Display of pictures, signs with sexual nature/ connotation/ overtones in the work area and work-related areas.
   (viii) Showing pornography, making or posting vulgar/ indecent/ sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.
   (ix) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's
   (x) Giving gifts or leaving objects that are sexually Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy; Persistent watching, following, contacting of a person; and

(xi) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

- The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
  i. Implied or explicit promise of preferential treatment in employment;
  ii. The implied or explicit threat of detrimental treatment in employment;
  iii. The implied or explicit threat about the present or future employment status;
  iv. Interference with the person's work or creating an intimidating or offensive or
  v. hostile work environment; or
  vi. Humiliating treatment is likely to affect health or safety.

An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the aggrieved woman.

5. Applicability & Scope

This Policy is applicable to:

- All employees: permanent, temporary, ad-hoc, probationers, trainees, interns, apprentices, consultants, and contract workers.
- Any woman employee, irrespective of age or employment status.
- All workplaces: offices, project sites, vehicles provided by the Company, client locations, offsite meetings, work travel, training programs, work-from-home virtual platforms.
- All incidents occurring during employment, travel, training, company events, or any situation arising out of work-related interactions.

Where sexual harassment occurs to any employee of the Company as a result of an act by a third party or outsider during official duty, the Company shall take all necessary and reasonable steps to assist the affected person with support, guidance, and preventive action, including helping the individual file a complaint with relevant authorities.

6. Procedures & Guidelines

6.1 Constitution of the Internal Complaints Committee ('ICC')

As per Section 4 of the Act, the Company shall constitute an Internal Committee.

The Internal Committee (IC) for addressing complaints under the Prevention of Sexual Harassment (POSH) Policy is constituted as per the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The current composition of the IC is as follows:

(i) **Ms. Rekhaben Vaghajibhai Der (Presiding Officer)**
(The presiding officer shall be a woman employed at a senior

position/workplace from amongst employee)

(ii) **Ms. Gopiben Goti (Member)**

(iii) **Mr. Parimal Parmar (Member)**
(The above members would be from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.)

(iv) Mr. Ketur Laliwala (Member)
(The above member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Every Member of the ICC shall hold office for a period not exceeding three years, from the date of their nomination as may be specified by the Management.

6.2 Procedure of filing a Complaint-

(a) The complaint should be made by an aggrieved woman within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of last incident. The complaint by an aggrieved woman employee shall be made to ICC in writing and be sent either by post or given in person to the ICC of the establishment or any officer authorized by ICC in writing.

(b) The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period. Where the employee is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir may make a complaint under this section.

It is, however, pertinent to state that where the aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by—

(a) her relative or friend; or
(b) her co-worker; or
(c) an officer of the National Commission for Woman or State Women's Commission; or
(d) any person who has knowledge of the incident, with the written consent of the aggrieved woman;

Where the aggrieved woman is unable to make a compliant on account of her mental incapacity, a complaint may be filed by—

(a) her relative of friend; or
(b) a special educator; or
(c) a qualified psychiatrist or psychologist; or
(d) the guardian or authority under whose care she is receiving treatment or care; or
(e) any person who has knowledge of the incident jointly with her relative or

friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care;

Notes:

i. Where the aggrieved woman for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.

ii. Where the aggrieved woman is dead, a complaint may be filed by any person who has knowledge of the incident with the written consent of her legal heir.

6.3 Procedure to be followed post receipt of Complaint

a) Receipt and Preliminary Examination of Complaint:

Upon receipt of a written complaint, the IC shall examine the complaint and initiate proceedings in accordance with the provisions of the Act and Rules. The IC shall ensure that the complaint is handled sensitively, impartially and confidentially, while maintaining the dignity and privacy of the aggrieved woman and the respondent.

(b) Conciliation:

Before initiating an inquiry, the IC may, at the written request of the aggrieved woman, take steps to settle the matter between her and the respondent through conciliation, in accordance with Section 10 of the Act.

Provided that no monetary settlement shall be made the basis of such conciliation.

Where a settlement is arrived at, the IC shall record the settlement and forward the same to the Employer for taking appropriate action. Copies of the recorded settlement shall be provided to both parties.

Where the terms of the settlement are not complied with by the respondent, the IC shall proceed with the inquiry or take such further action as may be permissible under the Act.

(c) Initiation and Conduct of Inquiry:

Where no settlement is arrived at through conciliation, or where the aggrieved woman does not request conciliation, the IC shall proceed to conduct an inquiry into the complaint in accordance with the provisions of Section 11 of the Act and the applicable Rules.

Where the respondent is an employee, the inquiry shall be conducted in accordance with the applicable service rules of the Company and, where no such service rules exist, in such manner as may be prescribed under the Act and Rules.

(d) Opportunity of Being Heard:

Both the aggrieved woman and the respondent shall be given a reasonable opportunity of being heard during the inquiry proceedings. The IC shall follow the principles of natural justice and ensure that both parties are provided with a copy of the findings and are given an opportunity to make representations against such findings before the IC.

(e) Powers of the Internal Committee:

For the purpose of conducting an inquiry, the IC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908, when trying a suit, in respect of the following matters:

(i) Summoning and enforcing the attendance of any person and examining such person on oath;

(ii) Requiring the discovery and production of documents; and

(iii) Any other matter which may be prescribed under the Act.

(f) Time Limit for Completion of Inquiry:

The IC shall complete the inquiry within a period of ninety (90) days from the date of receipt of the complaint, in accordance with Section 11(4) of the Act.

(g) Submission of Inquiry Report:

Upon completion of the inquiry, the IC shall prepare and submit its inquiry report containing its findings and recommendations to the Employer within ten (10) days from the date of completion of the inquiry.

A copy of the inquiry report shall also be made available to the aggrieved woman and the respondent to enable them to make representations, wherever applicable, in accordance with the provisions of the Act.

(h) Recommendations Where Allegations Are Proved:

Where the IC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Employer:

(i) To take appropriate action against the respondent for sexual harassment as misconduct in accordance with the applicable service rules of the Company or, where no such service rules exist, in such manner as may be prescribed under the Act;

(ii) To deduct, from the salary or wages of the respondent, such amount as may be determined by the IC and paid to the aggrieved woman or her legal heir, as compensation in accordance with Section 15 of the Act; and

(iii) To take such other appropriate action as may be warranted under the provisions of the Act and applicable laws.

(i) Recommendations Where Allegations Are Not Proved:

Where the IC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Employer that no action is required to be taken against the respondent in respect of the complaint.

(j) Action by the Employer:

The Employer shall act upon the recommendations of the IC within sixty (60) days of receipt of the inquiry report, in accordance with Section 13(4) of the Act.

(k) False or Malicious Complaints:

Where the IC arrives at a conclusion that the allegation against the respondent is malicious or that the aggrieved woman has knowingly made a false complaint or produced forged or misleading documents, it may recommend appropriate action against the complainant in accordance with Section 14 of the Act.

Provided that the mere inability to substantiate a complaint or provide adequate proof shall not attract action against the aggrieved woman under this provision.

(l) False Evidence by Witnesses:

Where the IC arrives at a conclusion that, during the inquiry, any witness has knowingly given false evidence or produced forged or misleading documents, it may recommend appropriate action against such witness in accordance with the applicable service rules and the provisions of the Act.

(m) Cooperation by the Employer:

The HR/Personnel/Administrative Department of the Company shall extend all necessary assistance and cooperation to the IC for conducting the inquiry, including facilitating the attendance of the respondent and witnesses, providing relevant records and documents and ensuring that the proceedings are conducted within the statutory timelines.

(n) Interim Relief During Pendency of Inquiry

During the pendency of an inquiry, the IC may, at the written request of the aggrieved woman, recommend to the Employer such interim relief as may be appropriate in accordance with Section 12 of the Act read with Rule 8 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, including:

(i) Transfer of the aggrieved woman or the respondent to any other workplace;

(ii) Grant of leave to the aggrieved woman for a period not exceeding three (3) months, in addition to the leave to which she is otherwise entitled;

(iii) Restraining the respondent from reporting on the work performance of the aggrieved woman or writing her confidential report, and assigning the same to another officer; and

(iv) Granting such other relief as may be prescribed under the Act and Rules.

The Employer shall implement the recommendations made by the IC under this clause and forward a report of such implementation to the IC.

The leave granted under this clause shall be in addition to the leave ordinarily admissible to the aggrieved woman.

6.4 Guidelines to be kept in mind by ICC while recommending Action

(a) To conduct the enquiry as per the Principles of natural justice and in a confidential manner.

(b) In cases where the ICC has recommended to Management for compensation to be made to the CE, then the said amount shall be deducted from the salary of the RE and paid to the CE or her legal heir/s.

(c) In case the RE fails to pay the sum referred as above, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

(d) Where the ICC arrives at a conclusion that the allegation against the RE is malicious or the CE has made the complaint knowing it to be false or the CE has produced forged or misleading document, it may recommend to the Management of the establishment to take action against the CE as stipulated by section 14 of the SHWW Act.

(e) Where the ICC arrives at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the Management to take appropriate action.

6.5 Employer (Management of the Establishment) to ensure:-

(a) That in case there is a complaint against any of the ICC members, Management will have to reconstitute the ICC. In all such cases the guidelines as defined in the above clauses would be inclusive of the time taken to reconstitute the said committee.

(b) The Management will provide assistance to the CE if she so chooses to file a police complaint in relation to the offence under the Bharatiya Nyaya Sanhita,

2023 or any other law for the time being in force.

(c) The Management will also initiate action under the Bharatiya Nyaya Sanhita, 2023 or any other law for the time being in force, against a perpetrator, where the perpetrator is not an employee of the establishment and there is complaint of Sexual Harassment against the said perpetrator in the workplace where the harassment took place.

(d) The ICC will submit an annual report to the Management outlined in the SHWW Act and it is the responsibility of the Management to ensure that the said annual report is also filed with the District Officer as per the format applicable.

(e) The Management will direct HR/Personnel/Administrative Department to ensure to display at conspicuous places the guidelines as given in section 19(b) of the SHWW Act.

(f) The Management will direct and monitor the HR/Personnel/Administrative Department to create awareness amongst employee material on sexual harassment in the following manner:-

(i) Training cum Awareness session for employees (men and women)
(ii) Training cum Awareness session for ICC members
(iii) Training cum Awareness session for Human Resource teams and Senior Management.

(g) The Management will assist in ensuring the attendance of the RE and witnesses before the ICC as the case may be.

(h) The Management will monitor timely submission of reports. For this, the Management will conduct periodic update meetings with the ICC and HR/Personnel/Administrative Department to ensure that the said policy is being implemented in letter and spirit.

6.6 Appeal by the aggrieved person

Any person aggrieved from the recommendations made by the ICC enquiring with the allegations against the respondent has not proved, or the ICC arrived at a conclusion that during the enquiry any witness has given false evidence or produced any forged or misleading documents or contravenes the provisions of section 17 of the SHWW Act or when the persons entrusted with the duty to handle or deal with the complaint, the enquiry or recommendations makes known the contents of the complaint and the implementation or non-implementation of such recommendations, may appeal to the appellate authority in accordance with the Sexual Harassment of Women at Workplace Act (Prevention, Prohibition and Redressal) Act, 2013, within 90 days of the recommendations being communicated, wherever applicable.

7. Confidentiality

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the

committees, action taken by the employer is considered as confidential materials, and not published or made known to public or media. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed

8. Protection to Complainant

The Company strictly prohibits any form of retaliation or victimization against a complainant or any witness involved in the complaint process.

9. Sexual Harassment by Third Parties

Company will assist complainant in filing case with appropriate authority if harassment is by someone not employed by the Company.

10. Miscellaneous:

a) 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.

b) Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.

c) The Internal Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its annual report:

i. Number of Complaints of sexual harassment received during the year;
ii. Number of Complaints disposed of during the year;
iii. Number of cases pending for more than 90 days;
iv. Number of workshops or awareness program against sexual harassment carried out;
v. Nature of action taken by the employer.

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