

ANTI-SEXUAL HARASSMENT POLICY

(Approved by the Board in their meeting dated 17.07.2025)

1. Policy Statement

At Sellowrap Industries Limited (“SIL”), as an equal opportunity employer, we are committed to fostering an environment where women feel empowered and safe. With a growing number of women in the workplace, it is imperative to provide a secure and conducive work environment, along with clear escalation mechanisms to address discrimination or harassment of any kind.

The *Prevention of Sexual Harassment Policy* underscores SIL's commitment to maintaining a workplace free from sexual harassment, intimidation, and exploitation. All employees, including temporary or short-term personnel, must treat one another and visitors to the organization with dignity and respect. Violators of this policy will face strict disciplinary action.

2. Scope

This policy applies to all SIL employees, including those based in India or visiting India from global SIL locations. It is incorporated into the service conditions of all employees and takes effect immediately.

In cases where a SIL employee faces harassment by a third party or outsider during official duties, SIL will take necessary steps to support and assist the affected person. This policy does not override any other legal rights available to employees.

3. Definitions of Harassment

Sexual harassment is defined as any unwelcome, sexually oriented behavior that disrupts the working environment. It includes:

3.1 Physical Harassment

- Unwelcome physical contact or advances.
- Intentional touching, pinching, or brushing against someone's body.
- Sexual assault.
- Blocking someone's path or cornering them.
- Excessively prolonged handshakes.

3.2 Verbal Harassment

- Demands for sexual favors in exchange for job benefits (e.g., promotions, increments).
- Sexually colored remarks or gestures.
- Sexual jokes, teasing, or misogynistic humor.
- Inappropriate comments about someone's appearance, especially body parts.
- Catcalls, whistles, or unwelcome endearments like "honey" or "sweetheart."

3.3 Written or Graphic Harassment

- Display or circulation of pornographic materials.
- Sexually explicit notes, emails, or texts.
- Leering or suggestive gestures.
- Displaying inappropriate visuals such as pinups or cartoons.

3.4 Other Conduct

- Any other unwelcome behavior of a sexual nature.

4. Redressal Mechanisms

4.1 Sexual Harassment Redressal Committee

The details regarding the composition of the Sexual Harassment Redressal Committee are available on the Company's website and can be accessed at: <https://sellowrap.com/composition-of-committees/>

4.2 Reporting and Confidentiality

- A member of the redressal committee shall be especially designated as a Redressal Advisor.
- Complaints must be reported promptly to the committee. Each manager/ supervisor must treat every complaint of harassment communicated to him or her seriously by immediately contacting the Redressal Committee.
- The complaint can be either raised by the affected person or by any employee who has witnessed such behaviour.
- Confidentiality is paramount, and information will be shared only with those directly involved. The company will keep complaints, investigative records, and the results of the investigation

confidential. If an investigation confirms that harassment has occurred, the company will take corrective action, including appropriate discipline, up to and including termination.

4.3. Redressal Procedures

The redressal procedures shall be designed with sensitivity to address the inherently delicate nature of complaints related to sexual harassment.

4.4. Redressal System:

For complaints, the redressal advisor shall advise the complainant to register a written complaint for a formal redressal. The steps of this process are:

4.5 Receipt of complaints

All complaint should be in:

- Writing to ensure consistency and accuracy.
- State the name of the alleged offender including designation and contact numbers
- State the date and location of the alleged incident/s of harassment
- A detailed description of the incident in question as well as other relevant circumstances
- Names of witnesses and physical and/or documentary proof if any that supports the allegation including other potential complaints, if any
- At this level the strictest confidentiality shall be observed, therefore restricting all information generated to the smallest possible group.
- The committee shall provide written notification of the scheduled time and date for the meeting after receiving the complaint. Both the complainant and the alleged harasser will be informed in writing and requested to appear before the committee.
- A copy of the complainant's statement shall be provided to the alleged harasser, who will be given adequate time to present their case before the committee.

4.6 Investigation Process

- Upon receiving a complaint, the redressal committee must appoint two members to conduct a confidential investigation.
- Throughout the process, it is essential to ensure that the dignity of both the complainant and the alleged harasser is upheld.

- The committee shall have the authority to summon any employee it deems necessary for the investigation.
- The investigation report must be submitted to the redressal committee at least one working day prior to the hearing. Both the complainant and the alleged harasser will also receive a copy of the report.
- Minutes of the proceedings will be recorded to maintain an accurate account of the events.

4.7 Communication

- The committee's findings shall be communicated to the parties in writing, and the necessary actions will be implemented by HR.
- The disciplinary actions recommended by the redressal committee will be disclosed separately to both the complainant and the alleged harasser.

4.8 Disciplinary Actions in case of redressal mechanism

- A letter of warning will be placed in the personal file for the offence that is deemed minor by the redressal Committee.
- Suspension, Demotion, transfer, pay reduction or compensation to the complainant could also be the actions taken depending on the severity of the case.
- Action may vary from warning to termination of services, depending upon the intensity of violation of conduct.

5. Protection Against Retaliation

Retaliation is a grave violation of this policy. SIL strictly prohibits any form of retaliation against individuals who report suspected incidents of harassment or cooperate in investigations of such cases. Examples of retaliation include, but are not limited to, threats of adverse employment actions, unsubstantiated negative performance evaluations, continued harassment in any form, discriminatory treatment, or denial of benefits, roles, titles, training, or promotions for which the individual is eligible.

If anyone experiences retaliation, such as intimidation, pressure to withdraw the case, or threats for reporting, testifying, or participating in the proceedings, they should promptly report the matter to the Redressal Committee.

As with harassment complaints, retaliation will also be treated as misconduct. SIL Group will take appropriate measures to prevent or address retaliation, even if the original harassment complaint is not substantiated.

Additionally, any attempt to exert undue influence—whether directly or indirectly—on the proceedings of an inquiry by either party will be considered misconduct and will result in disciplinary action.

6. Appeals and Alternate Remedies

- Dissatisfied employees may appeal to the Managing Director within three working days of the investigation's conclusion.
- Employees may also seek legal remedies outside the organization.

7. Treatment of False Complaints/Allegations

- This is a highly sensitive area, and any allegations or complaints, even if handled discreetly, could harm the reputation of the person accused.
- Baseless allegations must therefore be strictly avoided.
- If an investigation establishes that a false complaint was filed with the intent to defame the alleged harasser, disciplinary action will be initiated against the complainant.

8. Delay in Filing Complaints

SIL Group encourages the prompt reporting of sexual harassment complaints to enable timely and appropriate action. While complaints should ideally be submitted in writing within 30 calendar days, the Committee may consider delays favorably, given the sensitivity of such issues and the emotional impact on the complainant, provided a sufficient explanation for the delay is submitted.

The Committee will also accept complaints, as outlined in this policy, from former employees who experienced harassment during their tenure with SIL Group. Such complaints must be submitted in writing within three months of the employee's departure.

9. Consensual Relationships

SIL Group discourages romantic or sexual relationships between management or supervisory employees and their staff (employees who report directly or indirectly to them), as such relationships may lead to conflicts of interest at work.

To avoid any potential issues, it is in the best interest of all parties involved that, if such a relationship exists, the individuals involved notify management. This will allow for the adjustment of the reporting structure to ensure there is no direct or indirect reporting relationship between the parties.

10. Policy Evaluation

- The Sexual Harassment Policy shall be evaluated regularly, and any necessary amendments will be recommended by the redressal committee based on their experience in handling complaints.



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- This evaluation will take place at least annually. The policy will remain flexible to accommodate amendments that address situations not initially covered.

*For Sellowrap Industries Limited
(Formerly known as Sellowrap Industries Private Limited)*

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