

PALUCK TECHNOLOGIES LIMITED

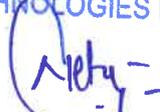
**(192/6, Nitin Vihar, Opp. Indian OIL Petrol Pump Near Hero Honda Chowk,
Gurgaon, Haryana, India, 122001)**

*****CIN: U74110HR2010PLC040347*****

***POLICY ON PREVENTION OF SEXUAL HARASSMENT OF
WOMAN AT WORK PLACE***

***Approved by Board of Directors at its meeting held on
18th Sep, 2025.***

For PALUCK TECHNOLOGIES LTD.


Director

- **“Employer”** means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and will include ‘Director and General Manager’, ‘Chief People Officer (CPO)’ and ‘Chief Operating Officer (COO)’.
 - **“Internal Committee”** means and include an Internal Complaints Committee (hereinafter referred to as the “ICC”).
 - **“Member”** means a member of the ICC.
 - **“Presiding officer”** means the presiding officer of the ICC and shall be a woman employed at a senior level at the workplace amongst the employees.
 - **“Respondent”** means a person against whom a complaint of alleging sexual harassment has been made under this policy.
 - **“Parties”** means collectively the complainant and the respondent.
 - **“Sexual Harassment”** includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):
- 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) Physical contact and advances;
 - (ii) Demand or request for sexual favours;
 - (iii) Making sexually coloured remarks or remarks of sexual nature about a person’s clothing or body;
 - (iv) Showing pornography;
 - (v) Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including but not limited to cat-call, wolf/finger whistle, vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.

Sexual harassment can involve a series of incidents or it can be a one-off occurrence.

B. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behavior of sexual harassment may amount to sexual harassment: -

- ❖ Implied or explicit promise of preferential treatment in employment; or
- ❖ Implied or explicit threat of detrimental treatment in employment; or
- ❖ Implied or explicit threat about the present or future employment status; or
- ❖ Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
- ❖ Humiliating treatment affecting any person’s health or safety.

representative, as more fully described under Rule 6 of the said Rules, may make a complaint.

- The HC Department or Ethics Office will officially forward the complaint to the Presiding Officer of ICC within seven (7) days from the date of making of the complaint.
- The complainant shall submit six copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

5. REDRESSAL PROCESS

5.1 Conciliation

Before the ICC initiates an inquiry, the complainant may request the ICC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the ICC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the ICC.

5.2 Inquiry

- (i) In case where a settlement is not feasible or could not be arrived at through Conciliation (ref clause 6.1 above), the ICC will conduct an inquiry into the complaint. Additionally, an inquiry may also be initiated if the aggrieved person informs the ICC that any terms of settlement (ref clause 6.1 above) has not been complied with by the respondent.
- (ii) The ICC within 7 (seven) working days of receiving the complaint shall forward one copy thereof to the respondent for obtaining a response.
- (iii) The respondent within 10 (ten) working days of receiving the complaint shall file his/her reply to the complaint along with list of supporting documents, names and addresses of witnesses.
- (iv) The ICC shall consider the reply from the respondent and initiate an inquiry. The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the ICC. ICC shall hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.
- (v) In the event of failure to attend personal hearing before ICC by the complainant or the respondent on three consecutive dates (intimated in advance), the ICC shall terminate the inquiry proceedings or give an ex-parte decision. However, the ICC shall serve a notice in writing to the party (ies), 15 (fifteen) days in advance, before such termination or the ex-parte order.
- (vi) The inquiry process shall be completed maximum within the period of 90 (ninety) days from the date of receipt of the complaint.
- (vii) The ICC within 10 (ten) days from the date of completion of inquiry shall provide a report of its findings to CPO and Director & General Manager and such report shall also be forthwith made available to the complainant and respondent.
- (viii) Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code⁴ (45 of 1860) or under any other law; it shall

Any person aggrieved by the recommendation of ICC may prefer an appeal under the relevant provisions of the Act and Rules.

5.7 Disciplinary Proceedings

Pursuant to written recommendation of CPO on the basis of report and findings of ICC and subject to the final outcome of the appeal proceedings, if any, (ref. clause 6.6 above) necessary disciplinary proceedings may be initiated against the respondent in terms of the applicable provisions of Employee Handbook of the Company.

5.8 Savings and Repeal

PALUCK TECHNOLOGIES LIMITED 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. SCL will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure with established malicious intent will be penalized as outlined above.

For PALUCK TECHNOLOGIES LTD.

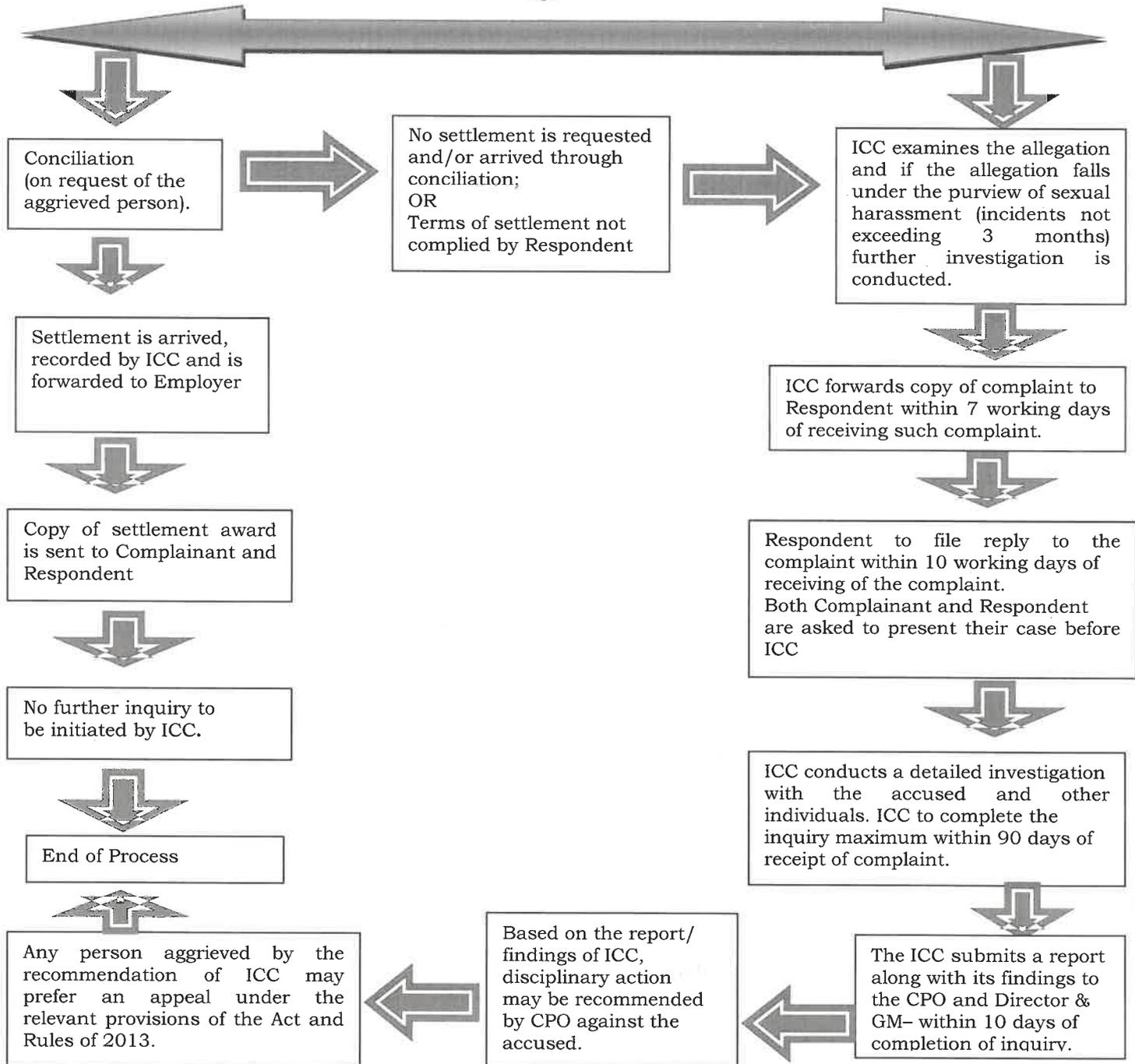


Director

GRIEVANCE REDRESSAL PROCEDURE

Reporting of Complaint through HC or Ethics Office

HC or Ethics Office to officially forward the complaint to Presiding Officer of ICC within 7 days from the date of making complaint



[Signature]
Director