

SINGER INDIA LIMITED

POLICY AGAINST SEXUAL HARASSMENT AT WORKPLACE UNDER POSH ACT

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INTRODUCTION

Singer India Limited (“the Company/Singer”) is committed to provide a healthy and safe working environment that enables all employees to be treated with respect and dignity. The company aims to promote and ensure a culture that will enable all its employees to work without fear of gender bias and sexual harassment.

OBJECTIVE

The objective of this policy is to establish that inappropriate behavior of a sexual nature, and / or retaliation will not be tolerated at Singer and to set forth procedures for resolving such allegations. All employees shall have access to this Policy at any given point of time and clarification related to this policy shall be addressed by the HR Department of the Company. The Company shall display a notice stating the names of the Internal Committee Members at a conspicuous place in the office. This Policy has been further amended by the Board of Directors via resolution by Circular on April 07, 2026.

DEFINITIONS

- 1. Aggrieved Person** - In relation to a workplace, a person, of any age, whether employed or not, anyone who is present in the Workplace such as candidates, visitors, guests, etc., who alleges to have been subjected to any act of sexual harassment by the respondent.
- 2. Complainant** - Any aggrieved person who makes a complaint alleging sexual harassment under this policy.
- 3. Employer** - A person responsible for management, supervision and control of the workplace.
- 4. Employee** - A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent/employees, 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- 5. Respondent** - A person against whom a complaint of sexual harassment has been made by the aggrieved person under this policy.
- 6. Special Educator**- A Special Educator means a person trained in communication with people with

special needs in a way that addresses their individual differences and needs.

ROLE OF THE INTERNAL COMMITTEE

The Committee shall decide whether the facts contained in the complaint make out a case of “sexual harassment”. The role of the committee will be to establish that inappropriate behavior of a sexual nature, and / or retaliation will not be tolerated at Singer and to set forth procedures for resolving such allegations.

INTERNAL COMMITTEE (“COMMITTEE”)

Every complaint received shall be forwarded to the Committee formed under the Policy for redressal. The investigations shall be carried out by the Committee constituted for this purpose. The Committee has been constituted of the following members as nominated by the Company.

Head Office:

1. Ms. Alpana Sarna (Presiding Officer)
2. Ms. Madhu Vij
3. Mr. Anuj Kumar Vasdev
4. Mr. Prashant Aggarwal

Jammu Factory:

1. Ms. Alpana Sarna (Presiding Officer)
2. Ms. Madhu Vij
3. Mr. Bhupender Singh Sangwan
4. Mr. Sanjay Kumar Sharma

- At least one-half of the Members shall be women.
- The Presiding Officer and every member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination and can be reappointed for further term(s).
- A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a woman.

Disqualification of Presiding Officer or any member

A Presiding Officer or any Member of the Internal Committee shall be removed from the Committee, and the resulting vacancy will be filled through a fresh nomination, if:

(a) The details of the complaint, the identities of the aggrieved person, respondent, and witnesses, any information related to the conciliation and inquiry proceedings, the Committee's recommendations, or the actions taken by the Company are made public, disclosed to the press, or communicated to the media in any form.

However, information may be shared regarding the justice obtained by any victim of sexual harassment, provided that the name, address, identity, or any other details that could lead to the identification of the aggrieved person or witnesses are not disclosed.

(b) Has been convicted for an offence or an inquiry into an offence under any law pending against him/her; or

(c) Has abused his/her position as to render his/her continuation in office prejudicial to the public interest.

SCOPE

Application of Policy

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or otherwise whether male or female. The policy would apply inside the Office but also outside office on official duty (workshops, field work, group holidays/excursions organized by Company, interviews/meetings with outside people and any other activity organized by Company outside the office including the period of travelling for such activity). This Policy shall be applicable to Singer India Limited (including subsidiaries, acquired entities and affiliate companies) referred to as "Company."

The workplace includes:

- a. All offices or other premises where the Company's business is conducted.
- b. All company-related activities performed at any other site away from the Company's premises including while travelling.

- c. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d. Workplace or interactions arising from any work being carried out by or on behalf of the Company.

Who can file the complaint?

Any aggrieved person on his/ her own behalf can file the Complaint in writing. The complaint must be made within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. The period within which one can file the complaint can be extended to another period of three months for the reasons to be recorded in writing by the Internal Committee, if it is satisfied that the circumstances were such which prevented the person from filing a complaint within the said period.

If the aggrieved person is unable to file the complaint on account of any physical or mental incapacity, then subject to satisfactory establishment of the incapacity, any of the person on behalf of such aggrieved person, any of his/her guardian(s), friend, relative, co- worker, an officer of the National Commission for Women or State Women's Commission or any person who has knowledge of the incident may file the Complaint to whom written authority is provided by the Aggrieved person.

Against whom complaint can be filed?

The Policy against sexual harassment includes sexual harassment by fellow employees, supervisors, managers as well as agents, contractors, customers, vendors and visitors including outsource employees. Any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey. Sexual harassment as addressed in this Policy need not necessarily be from a male to a female employee, it can be vice versa as well as between individuals of same gender.

Procedure to be followed for dealing with the complaint

An aggrieved person may file the complaint along with all necessary documents, if any, and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses, under this Policy by sending an email at ethics@singerindia.com along with the Complaint Form as mentioned in **Annexure-1**, within three months from the date of incident or such extended period as may be granted by the Committee keeping in mind the seriousness of the incident. However, any written complaint received in any form other than the form prescribed in

Annexure - 1 shall also be accepted.

Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the Aggrieved person for making the complaint in writing.

1. If the Aggrieved Person is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by:
 - His/her relative or friend; or
 - His/her co-worker; or
 - any person who has knowledge of the incident, with the written consent of the Aggrieved Person
2. If the Aggrieved Person is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by:
 - his/her relative or friend; or
 - a special educator; or
 - the guardian or authority under whose care he/she is receiving treatment or care; or
 - any person who has knowledge of the incident jointly with the Aggrieved Woman's 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.
3. If the Aggrieved Person 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 his/her written consent.

POWERS & DUTIES OF THE COMMITTEE

- On receipt of the complaint, the Committee shall decide the date, time and place of hearing to the Complainant and Respondent.
- The Committee shall have the power to summon witnesses and call for documents or any information from any employee.
- If the Committee has reason to believe that an employee is capable of furnishing relevant documents or information, it may direct such person to produce such documents or information by serving a notice in writing on that person, or calling for such documents or information as may be specified in the written notice.
- Upon production of documents / information called for by it, the Committee shall have the power

to retain such documents / information for such period as may be deemed necessary for purposes of the proceedings before it.

- The Committee shall have the power to issue interim directions to / with regard to any person participating in the proceedings before it.
- The Committee may, before initiating an enquiry at the request of the aggrieved person attempt to settle the matter through conciliation. However, the Committee shall ensure that –
 - (a) Monetary settlement will not be made as a basis of conciliation.
 - (b) Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.
- The Committee shall have the power to recommend the action to be taken against any person found guilty of (a) sexually harassing the Complainant; (b) retaliating against / victimizing the Complainant or any other person before it; and (c) making false charges of sexual harassment against the accused person.
- The Committee shall have the right to terminate the enquiry or give ex-parte decision on the complaint if the Respondent or Complainant remains absent for three (3) consecutive hearings without sufficient cause.
- If the allegation against the Respondent has not been proved, the Committee may recommend that no action need to be taken in the matter.
- The Committee, during the investigation may assume the power of a Civil Court.
- The Committee shall meet once in six-months to monitor and review the actions taken.
- The Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual Report:

(Schedule V of SEBI LODR Regulation, 2015, Clause C (10) (I))

1. Number of complaints of sexual harassment received during the year;
2. Number of complaints disposed of during the year;
3. Number of cases pending for more than Ninety (90) days as on end of financial year,
4. Number of workshops or awareness programs against sexual harassment carried out,

5. Nature of action taken by the employer.

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.

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:

1. 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 –
 - (a) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit
 - (b) Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation
 - (c) Teasing, Voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will
 - (d) Demand or request for sexual favors
 - (e) Sexually colored remarks or remarks of a sexual nature about a person's clothing or body
 - (f) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas
 - (g) 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. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes.
 - (h) 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,
2. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment –
 - (a) Implied or explicit promise of preferential treatment in employment;
 - (b) Implied or explicit threat of detrimental treatment in employment;
 - (c) Implied or explicit threat about the present or future employment status;

- (d) Interference with the person's work or creating an intimidating or offensive or hostile work environment or
- (e) Humiliating treatment likely to affect health or safety.
- (f) 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.

Virtual Sexual Harassment

Given the rise of virtual workspaces, including communication via smartphones and web calls, it is essential to ensure that all virtual interactions are conducted in a professional manner. To address this evolving work environment, the following guidelines have been introduced for virtual interactions:

Do's:

- **Proper Attire** – Employees attending video conferences should dress appropriately, adhering to professional standards expected in a workplace.
- **Content of Conversation** – Conversations during virtual meetings should remain focused on work-related topics, such as projects, deliverables, and professional discussions.

Don'ts:

- Employees should avoid attending video conferences wearing casual or inappropriate attire, such as vests, shorts, or T-shirts with suggestive or offensive phrases.
- The background of video calls should be appropriate; no posters, images, or elements with suggestive content should be visible during virtual meetings.
- Inappropriate jokes or comments should be strictly avoided.

Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or even a compliment can lead or contribute to harassment.

This is only an indicative list of the possible acts which could be treated as sexual harassment and in no way is an exhaustive list.

In addition to the instances mentioned hereinabove, any other acts or behaviour, which outrages the modesty of the aggrieved person, will be considered as sexual harassment.

Receiving a Complaint (guidelines)

1. Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint. The following points are to be kept in mind by the receiver of the complaint: -
 - Complaints are listened to and the complainant informed that the Company takes the concerns seriously. Complainant is informed that these concerns will be reported to the appropriate committee and follow up will be done speedily.
 - Situations are not being pre-judged. Written notes are to be taken while listening to the person. When taking notes, complainant's own words, where possible, are to be used accurately. A clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
 - All notes are kept strictly confidential. The complaints' agreement is taken to allow proceeding with the matter, which involves a formal investigation.
2. The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity. Care is taken to prevent any disadvantage to or victimization of either the complainant or the respondent.
3. The Management will forward such written complaint to the Committee within two working days.
4. The Committee may direct the Complainant to prepare and submit a detailed statement of incidents if the written complaint lacks exactness and required particulars, within a period of two (2) days from such direction or such other time period that the Committee may decide. The Complainant shall sign the complaint. The Committee shall also direct the accused employee to prepare and submit a written response to the complaint / allegations within a period of two (2) days from such direction or such other time period as the Committee may decide.
5. Each party shall be provided with a copy of the written statement(s) submitted by the other. The Committee shall allow both parties a reasonable opportunity of presenting their case. However, should the accused choose not to participate in the proceedings, the Committee shall continue ex party.
6. The Committee shall allow both parties to produce relevant documents and witnesses to support their case. Documents produced by either party shall be affixed with that party's signature to certify the document as original / true copy.

7. The party against whom the document / witness is produced shall be entitled to challenge/ cross-examine the same.
8. Minutes of all proceedings of the Committee shall be prepared and duly signed by the presiding officer of the Committee.
9. The Committee shall make all endeavors to complete its proceedings within a period of thirty (30) days from the date of receipt of Complaint. However, the maximum time allowed to the committee to submit its findings shall be three (3) months.
10. The Committee shall record its findings in writing supported with reasons and shall forward the same with its recommendations, to the HR Department, within a period of five (5) days from completion of the proceedings before it.
11. The Committee shall monitor the follow-up action to be taken by the HR Department on receipt of the Report of the Committee.
12. In case the Committee finds that the facts disclose the commission of a criminal offence by the accused person, this shall be specifically mentioned in the Committee's report.
13. If the Internal Committee arrives at the conclusion that the allegation against the accused person has been proved, it shall recommend to:
 - a) Take action for sexual harassment as misconduct.
 - b) To tender written apology to the Complainant, issue warning, withholding of promotions / increments of the accused person, terminating the accused person.
 - c) To deduct from salary / wages of the accused person or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
 - d) Any other measure in the view of the Committee is just and proper.

If, in the course of the proceedings before it, the Committee is satisfied that any person has retaliated against / victimized the Complainant or any person assisting him/ her as a result of the complaint having been made or such assistance having been offered, the Committee shall report the same in writing, to the HR Department, with reasons and with recommendations of the action to be taken against such person.

The parties shall not be allowed to bring any Legal Practitioner to represent them at any stage of the proceedings before the Committee.

Manner for Taking Action on Sexual Harassment Allegations

*In the event that an allegation of sexual harassment is proven, the **Internal Committee** will conduct an investigation and based on its findings, recommend the appropriate disciplinary action. Potential actions include:*

1. *Written apology*
 2. *Warning letter*
 3. *Withholding of promotion*
 4. *Withholding of pay rise or increments*
 5. *Deduction from salary*
 6. *Termination from service*
 7. *Financial penalty (based on mental and physical trauma, loss of career opportunity, medical expenses), payable in a lump sum or in instalments*
 8. *Counselling sessions*
 9. *Transfer to a different workplace*
 10. *Any other action deemed appropriate by the Internal Committee*
- a) In cases where the allegation is of a serious nature, such as threats of retaliation, or if the respondent refuses to comply with the Internal Committee's order, a criminal case will be filed with the police or courts at the discretion of the Internal Committee.
- b) In cases where the allegation is not substantiated, the Internal Committee will provide a report to the employer recommending no further action. The report will also be shared with both the respondent and the aggrieved person.
- c) As per the decision of the Committee Members/Management, leave will be granted to the Aggrieved Individual. This leave will be in addition to any leave the individual is otherwise entitled to.

False Accusations

If the Internal Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Committee may recommend action to be taken against the person who has made the complaint, including termination of service, imposition of penalties. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate

a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Committee concludes, that he/she has given false evidence or produced forged or misleading documents.

CONFIDENTIALITY

All proceedings, including the statements and other material put as evidence before the Committee shall be strictly confidential. The Committee shall take all steps to ensure that throughout the investigatory process to the extent practicable and appropriate, the parties before it and their representatives shall maintain strict confidentiality in all respects.

- Complaints made anonymously will also be investigated to the extent possible.
- Any employee who, in good faith, reports a possible violation of this policy shall be protected from any form of retaliation.

APPEAL

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the Appellate Authority in accordance with the Act, within **90 days** of the recommendations being communicated.

POLICY IMPLEMENTATION & REVIEW

The Policy will be implemented & reviewed by HR Department. The Company reserves the right to amend, abrogate, modify, rescind/ reinstate the entire policy or any part thereof from time to time.

The HR Department shall conduct awareness/orientation programs within the Company at regular intervals.

OTHERS

In Case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

MISCELLANEOUS

The decision of the Committee on any matter within its competence shall be considered final.

In case the conduct disclosed in the Committee's report is of a nature that amounts to a criminal offence under the law of the land, appropriate action shall be initiated by the HR Department, for making a police complaint in respect of the same.

In case of sexual harassment of any employee by any person not employed by Singer, the HR Department shall take all steps necessary and reasonable to assist the affected employee enabling him/ her to take recourse to the law.

Annexure 1

To,

The Internal Committee (IC)
[Name of the Organization]
[Date]

Personal Information of the Complainant

1. Full Name: _____
 2. Designation: _____
 3. Department: _____
 4. Employee ID (if applicable): _____
 5. Contact Number: _____
 6. Email Address: _____
 7. Office Address (if applicable): _____
-

Details of the Alleged Incident(s)

8. Date(s) of the Incident(s):

9. Time(s) of the Incident(s):

10. Location(s) of the Incident(s):

11. Name(s) of the Respondent(s):

12. Relationship/Interaction with Respondent(s):

-

Description of the Incident(s)

(Please provide a detailed description of the incident(s), including the nature of the harassment, actions or behaviour of the respondent, and any relevant events. Attach additional sheets if necessary.)

Details of Any Witnesses (if any)

13. **Name(s) of Witness(es):**

14. **Designation(s) of Witness(es):**

15. **Contact Information of Witness(es):**

Supporting Documents/Evidence

(Please attach any supporting documents or evidence that substantiate your complaint, such as screenshots, emails, photographs, etc.)

1.

2.

3.

Previous Actions (if any)

(Please provide details of any previous complaints or actions taken regarding this issue, including dates and outcomes.)

1.

2.

3.

Signature of the Complainant: _____

Date: _____
