



POLICY ON PREVENTION OF SEXUAL HARASSMENT

HIMALAYAN BIO ORGANIC FOODS LIMITED

Version: 1.0
Effective Date: 14th February 2026

POLICY ON PREVENTION OF SEXUAL HARASSMENT

Himalayan Bio Organic Foods Limited is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment.

Himalayan Bio Organic Foods Limited will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

The Policy for Prevention of Sexual Harassment was adopted by Board of Directors of Himalayan Bio Organic Foods Limited at the meeting held on 14th February 2026 in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013(POSH Act).

SCOPE:

This policy for **@Prevention of sexual harassment** applies to all categories of *employees of the Company **'Himalayan Bio Organic Foods Limited' against sexual harassment**, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by supplier or any other business associates.

@ "Prevention of sexual harassment"—(1) No woman shall be subjected to sexual harassment at any workplace.

(2) The following circumstances, among other circumstances, if it occurs, or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment:—

(i) implied or explicit promise of preferential treatment in her employment; or

(ii) implied or explicit threat of detrimental treatment in her employment ; or

(iii) implied or explicit threat about her present or future employment status; or

(iv) interference with her work or creating an intimidating or offensive or hostile work environment for her; or

(v) humiliating treatment likely to affect her health or safety.

* "employee" as per the Posh act means a person employed at a #workplace for any work on 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 co-worker a contract worker, probationer, trainee, apprentice or called by any other such name;

"Workplace" as per the Posh act includes—

(i) any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit which is established, owned, controlled or wholly or substantially financed by funds provided directly or indirectly by the appropriate

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Government or the local authority or a Government company or a corporation or a co-operative society;

- (ii) any private sector organisation or a private venture, undertaking, enterprise, institution, establishment, society, trust, non-governmental organisation, unit or service provider carrying on commercial, professional, vocational, educational, entertainment, industrial, health services or financial activities including production, supply, sale, distribution or service;
- (iii) hospitals or nursing homes;
- (iv) any sports institute, stadium, sports complex or competition or games venue, whether residential or not used for training, sports or other activities relating thereto;
- (v) any place visited by the employee arising out of or during the course of employment including transportation by the employer for undertaking such journey;
- (vi) a dwelling place or a house.

Definition:

“Complaint” means a voiced objection or the allegation by the Complainant or any other person (whether in writing or oral) of sexual harassment by the Respondent that forms the basis of an investigation under this policy. **“Complainant”** means the person (s) against whom an incident (s) of sexual harassment has been allegedly committed.

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“Respondent” means a person against whom the Complainant has made a complaint

“Sexual harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-

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

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriatetouching
- Physical violence, including sexualassault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours.

Verbal conduct

- Comments on a worker's appearance, age, private life etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestivematerial
- Sexually-suggestivegestures
- Whistling
- Leering

Anyone can be an aggrieved person,who could face sexual harassment, regardless of their gender and of the gender of the harasser. Himalayan Bio Organic Foods Limited recognizes that sexual harassment may also occur between people of the same gender. What matters is that sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Himalayan Bio Organic Foods Limited recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of Himalayan Bio Organic Foods Limited, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

Any act of sexual harassment is prohibited whether it takes place within Himalayan Bio Organic Foods Limited premises or outside, including at social events of the Company business trips, training sessions or conferences sponsored by Himalayan Bio Organic Foods Limited.

Internal Complaints Committee (“ICC”)

To enquire and advice suitable action on the complaints on Sexual Harassment, there shall be a Committee called “HBO-Internal Complaints Committee constituting:

- a. A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the Employees;

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other

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department or organization;

- b. Not less than 2 (two) members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge; and
- c. One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that at least one-half of the total Members so nominated shall be women.

The ICC will operate on the following guidelines:

- a. Every Complaint received shall be forwarded to the Internal Complaints Committee for investigation, inquiry.
- b. The Committee members on a need basis will be provided with necessary training to handle such matters effectively and with the required sensitivity and concern.
- c. The person against whom the allegation of Sexual Harassment has been made by the aggrieved person, the ICC shall meet as and when any instance of violation of the policy is referred to the committee and, in any case, at least once in a year.
- d. ICC shall prepare the annual report and submit the report pertaining to its functioning, including number of cases filed and their disposal under the act to the board.
- e. The presiding officer and the members of the ICC will hold the position upto three years from the date of their nomination and the company can renominate the existing members or nominate another person to replace a member who vacates office for any reason including resignation from the company's service.

Complaints Redressal Mechanism

- 1. Any aggrieved person may make, in writing, a complaint of sexual harassment at workplace to ICC 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, which may further be extended for a period not exceeding three months by ICC by recording the reasons in writing, if circumstances were such which prevented the aggrieved from filing a complaint within the said period.
- 2. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of ICC shall render all reasonable assistance to the aggrieved for making a complaint in writing.
- 3. Where the aggrieved employee is unable to make a complaint on account of their physical or mental incapacity or death or otherwise, (a) legal heir or friend; or (b) coworker; or (c) an officer of the National Commission for Women or State Women's Commission; or (d) any person who has knowledge of the incident, with a written consent of the aggrieved women; may make a complaint.
- 4. The ICC shall make inquiry into the complaint in accordance with the principles of natural justice.
- 5. The Complainant or person authorized on their behalf as per above provision, shall make a complaint to the ICC along with supporting documents and names and address of witnesses.
- 6. On receipt of such complaint, ICC shall provide a copy of such complaint along with supporting documents to the

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Respondent within 7 working days.

7. Respondent shall file reply to the complaint along with their list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents from ICC
8. ICC shall investigate the complaint in detail by giving reasonable opportunities for both the parties. For the purpose of making an inquiry, under this policy, ICC have the power of a civil court, vested in it, in respect of:
 - a. Summoning and enforcing the attendance of any person and examining him/her under oath;
 - b. Requiring discovery and production of documents;
 - c. Any other prescribed matter.
9. During the enquiry process, the Complainant and the Respondent shall refrain from any form of threat, intimidation or influencing of Witnesses and IC may recommend any interim relief to the complainant if a written request is received including:
 - i. transfer of the complainant or the Respondent to any other location;
10. grant leave to the complainant up to a period that ICC consider justified, that will be in addition to any other entitled leave. The Committee shall ensure confidentiality during the enquiry process and will ensure that sufficient care is taken to avoid any retaliation against the witnesses, complainant and respondent.
11. ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause, provided that such termination or ex-parte order may not be passed without giving a notice in writing, 15 days in advance, to the party concerned.
12. The ICC must complete its investigation within a period of 90 days.
13. For conducting the enquiry, the quorum of ICC shall be of 3 members including the presiding officer.
14. The ICC may before initiate an enquiry, and at the aggrieved party's request, attempt to settle the matter between them through conciliation. However, it shall ensure that:
 - a. No monetary settlement made as a basis of conciliation.
 - b. Where a settlement has been arrived, the ICC record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation. A copy of the same shall be provided to the aggrieved and the respondent. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the ICC.
15. During such enquiry, upon written request by the aggrieved person, the committee may at its discretion recommend:
 - a. To transfer the aggrieved person or the respondent to any other workplace
 - b. Grant leave to the aggrieved person, up to three months with salary which is in addition to leave to which he/she is otherwise entitled

Provided, the aggrieved person has to tender justified reason for such transfer or leave, such as threat to work in the work place

Informal complaints mechanism

If the aggrieved person wishes to deal with the matter informally, the ICC will:

- give an opportunity to the Respondent to respond to the complaint
- ensure that the Respondent understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a mediator within the company to resolve the matter

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- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped
- ensure that the above is done speedily and within 7 days of the complaint being made

Formal complaints mechanism

If the aggrieved person wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the aggrieved person, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal investigator in accordance with this policy.

The person carrying out the investigation will:

- interview the aggrieved person and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- prepare and produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the aggrieved person is, in consultation with the victim (i.e.-an apology, a change to working arrangements, a promotion if the aggrieved person was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behavior has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that all the records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 7 days of the complaint being made

Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the Company. They can do so through labour court or judicial court.

Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension

- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

FALSE ALLEGATION:

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.
2. Upon completion of the inquiry conducted in accordance with the prescribed procedure, ICC shall recommend action only where it is satisfied that the intent of the respondent stands established. 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 ICC concludes, that he/she has given false evidence or produced forged or misleading documents
3. The above provision is not to discourage employees from coming forward with complaints. ICC recognizes and expects certain claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to conclude as Sexual Harassment. Complaints falls under the above, shall not be considered to be false accusations

Implementation of this policy

Himalayan Bio Organic Foods Limited will ensure that this policy is widely disseminated to all relevant persons covered under scope of this policy. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the Company. Every year, Himalayan Bio Organic Foods Limited will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

Awareness

Awareness program to be organized to:

- a. Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- b. Carry out orientation programs and seminars for the members of the internal committee.
- c. Conduct capacity building and skill building programs for the members of the ICC.
- d. Declare the names and contact details of all members of the ICC.
- e. Use modules developed by the State Governments to conduct workshops and awareness programs for familiarizing the employees with the provisions of the act.

Monitoring and evaluation

1. Company with the approval of the Board or Nomination and Remuneration Committee 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 the Act.
2. Any such alteration or amendment or rescinding will be intimidated to the employees.
3. Nothing contained in these Policy 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.
4. The ICC shall prepare an annual report with the following details and shall submit the same to the Management and the District Officer to include in its annual report:
 - a. Number of Complaints of sexual harassment received during the year;
 - b. Number of complaints disposed of during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the employer;
5. The above Annual Report and the MIS should be prepared by the ICC and shall be submitted for the each calendar year in such form and at such time as may be prescribed under law.

CONCLUSION:

Himalayan Bio Organic Foods Limited recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz. the person filing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of the Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the aggrieved person may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available

Effective Date

This Policy is effective from the date of approval of the same by the Board of Directors of the Company in its meeting held on 14th February, 2026.

Policy Review

The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy.

Disclosures

The Company shall disclose the Policy on its website.