

<b>ORIENT TECHNOLOGIES LTD.</b>		
<b>Standard Operating Procedure: HR Policy</b>	<b>Issue No./Issue date</b>	<b>31-01-2017</b>
<b>Maker: Babita Thevar</b>	<b>Revision No.</b>	<b>4.2</b>
<b>Checker: Mansi Sawant</b>	<b>Revision Date</b>	<b>07<sup>th</sup> April 2026</b>
<b>Approved By (Director): Ajay Sawant</b>	<b>Department</b>	<b>HR</b>

## **PREVENTION OF SEXUAL HARASSMENT POLICY**

### **Introduction**

Orient Technologies Ltd is committed to providing a safe, respectful, and dignified workplace for all its employees. The Company prohibits any form of sexual harassment at the workplace and adopts a zero-tolerance approach in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules.

### **OBJECTIVE :**

To set the guidelines and processes for prevention of sexual Harassment by setting up the sexual harassment committee for Orient Technologies Ltd

The Orient Technologies Ltd is an equal employment opportunity company and is committed to creating a healthy working environment that enables employee to work without fear of prejudice, gender bias and a harassment free workplace.

### **SCOPE :**

This policy extends to all employees of the company, 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 suppliers or any other business associates.

### **The workplace includes:**

1. Whole premises of the company
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations

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## **DEFINITIONS AND EXAMPLES OF SEXUAL HARRASMENT**

**1. Sexual Harassment** - is defined under The sexual harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013 ("The sexual Harassment Act") is an act to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment. Sexual Harassment" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely: -

- a. Physical contact, including touching, Obscene gestures, indecent exposure, whistling
- b. A demand or request for sexual favors
- c. Making sexually coloured remarks
- d. Showing pornography
- e. Circulating obscene content by email, SMS or MMS
- f. Verbal abuse having sexual overtones
- g. Suggestive comments about a person's appearance, body or clothing
- h. Any physical or computerized display of sexually offensive or explicit material
- i. Unwanted infringement of an individual's personal space, which leads to discomfort
- j. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

When any such act or acts are committed in circumstances where such conduct is humiliating or is likely to constitute a health and safety problem, it will amount to sexual harassment that violates this, Policy. Sexual harassment may occur as single incident or series of incidents. The following circumstances, among other circumstances, if they occur or are present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment.

- a. Implied or explicit promise of preferential treatment in their employment
- b. Implied or explicit threat of detrimental treatment in their employment
- c. Implied or explicit threat about their present or future employment status
- d. Interference with their work or creating an intimidating or offensive or hostile work environment for them
- e. Humiliating treatment likely to affect health and safety of the employee (Whether male or female)

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2. **Workplace** - Includes all offices and Sites. It also includes any place visited or arising out of or during the course of employment/work. All company related activities performed at any other site away from the company's premises. Any social, business or other functions where the conduct and comments may have adverse impact on the workplace or workplace relations.
3. **Complainant** - An individual who raises the complaint of sexual harassment is the Complainant, thus referring to the associate with the company in a full time/part time capacity as an employee, contractor, client, partner, consultant, vendor, intern, volunteer or visitor.
4. **Respondent** - An individual against whom a complaint of sexual harassment has been received is referred to Respondent, thus referring to the associate with the company in a full time/part time capacity as an employee, contractor, client, partner, consultant, vendor, intern, volunteer or visitor.

**INTERNAL COMPLAINTS COMMITTEE / COMPLAINT REDRESSAL COMMITTEE :**

An Internal Committee (hereinafter called 'Committee') have been constituted by the Management of the Company to consider and redress complaints of Sexual Harassment.

The Chairman and Members of the Committee are as follows:

<b>Mumbai HO - Star Office</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Rajendra Karad	9833101480	rajendrakarad@orientindia.net
Ms. Ridhima Ajay Sawant	9769008790	ridhimasawant@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

<b>Mumbai HO - Center Office</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Suresh Bachwani	9769008793	sureshbachwani@orientindia.net
Ms. Yashshree Parab	9769008798	yashashreeparab@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

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<b>Turbhe Office</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Jayesh Sutar	8657475818	jayeshsutar@orientindia.net
Ms. Ashwini Nayak	9766033847	ashwininayak@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

<b>Bangalore Branch</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Syed Imran	9742280655	syedimran@orientindia.net
Ms. Yasshika Sawant	9892749731	yasshikasawant@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

<b>Pune Branch</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Prasad Pandharpurkar	9619713669	prasadpandharpurkar@orientindia.net
Ms. Dineshwari Gawali	9665927789	dineshwarigawali@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

<b>Chennai Branch</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Dinesh Dawson	9952960496	dineshdawson@orientindia.net
Ms. Babita Thevar	9167833453	babitathevar@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

<b>Delhi Branch</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Soumya Kundu	9555859892	soumyakundu@orientindia.net
Ms. Charu Sharma	9289190436	salesdel@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

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<b>Ahmedabad Branch</b>		
<b>Name</b>	<b>Contact No</b>	<b>Mail ID</b>
Ms. Mansi Sawant	9819302947	mansisawant@orientindia.net
Mr. Vipul Patel	9377767751	vipulpatel@orientindia.net
Ms. Rachana Chouhan	9152026379	rachanachouhan@orientindia.net
Mr. Manissh Assarkar	9820549733	manissh@assarkarco.in

#### **REDRESSAL PROCESS :**

1. A complaint can make in writing a complaint of sexual harassment to the internal complaint committee within a period of three months from the date of incidents and in case of a series of incidents, within a period of three months from the date of last incident within a period of three month from the date of last incidents. The ICC may for the reasons to be recorded in writing, extend to time limit not exceeding three months, if it is satisfied that the circumstances were such which prevent the complainant from the filing a complaint within a said period.
2. If the aggrieved individual for any other reason is unable to make a complaint, a compliant may be filed by any other person who has knowledge of the incident, with his/her written consent.
3. The complainant shall submit four copies of the complaint alongwith supporting documents and relevant details concerning the alleged incident's , the name and details of the respondent and names and addresses of the witnesses.
4. The committee will maintain record of the complaints received by it and keep the contents confidential, if it is so desired, except to use the same for discreet investigation.
5. The committee will hold a meeting with the complainant within five days of receipt of the complaint but no later than a week in any case.

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6. At first meeting the committee members shall hear the complainant and record his/her allegations. The complainant can also submit any corroborative material with a documentary proof, oral or written material etc. to substantiate her complaint. If the complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer involved and a male officer for male employee, involved shall meet and record the statement.
7. Thereafter the person against whom complaint is made may be called for a deposition before the committee and a opportunity will be given to him/her to give a explanation, where after an enquiry shall be conducted and concluded.
8. In the event the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.
9. In case the complaint is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management.

#### **ENQUIRY PROCESS**

1. The Committee shall immediately proceed with the Inquiry and communicate the same to the complainant and person against whom complaint is made.
2. If the complainant or the person against whom complaint is made desires any witness (es) to be called, they shall communicate in writing to the Committee, the names of witness (es) that they propose to call.
3. The responsibility of communicating with the witnesses lies with the complainant/defendant regarding the date, time and venue of the meeting.

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4. The Committee shall call upon all witnesses mentioned by both the complainant and the person against whom the complaint has been lodged.
5. The Committee shall provide every reasonable opportunity to the Complainant and the defendant for putting forward and defending their respective case.
6. The complainant and the defendant shall have the right of cross-examination of all witnesses.
7. The Committee shall have the right to summon, as many times as required, the defendant, the complainant and/or any witnesses for the purpose of supplementary testimony and/or clarifications
8. The Committee shall have the right to terminate the proceedings and to give an 'ex-parte' decision on the complaint, should the defendant fail, without valid ground, to present himself for three consecutive hearings convened by the Committee.
9. The Committee shall complete the 'Inquiry' within reasonable period but in no case beyond three months from the date of its commencement and communicate its findings and its recommendations for action to the management of the Company.
10. In the event of any delay in submission of the Inquiry Report, the reasons for the same shall be recorded in writing by the committee.

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### **OTHER RELIEF TO COMPLAINANT DURING PENDENCY OF INQUIRY**

The IC, at the written request of the Complainant may recommend to the Company-  
To either transfer the Complainant or the Respondent to any other location; or

Grant leave to the Complainant up to a period of three (3) months or grant such other relief to the Complainant as the IC deems appropriate; or

Recommend the manager of the upward hierarchy of the Company to restrain the Respondent from reporting on the work performance of the Complainant or writing her/his confidential report or assign the same to another officer.

### **INQUIRY REPORT**

On the completion of an inquiry, the Internal Committee will provide a report of its findings to the management of Orient Technologies Ltd, within a period of ten days from the date of completion of the inquiry and such report will be made available to the concerned parties.

In the event that the Internal Committee arrives at the conclusion that there is no case for Sexual Harassment, then the complaint may be dropped by the Internal Committee, and the Internal Committee shall notify the management of Orient Technologies Ltd of the same.

Where the Internal Committee arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the management of Orient Technologies Ltd to take appropriate action, including a written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, terminating the Respondent from service of Orient Technologies Ltd or that the Respondent undergoes a counselling session or carry out community service.

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The management of Orient Technologies Ltd shall act upon the recommendation of the Internal Committee within sixty days of its receipt by them.

If the allegation against the Respondent is proved to be false or malicious, action may be recommended against the Complainant as deemed fit by the Internal Committee. However, the mere inability to substantiate a complaint or provide adequate proof does not constitute grounds for taking action against the Complainant. Action can be taken against witnesses who give false evidence or produce any forged or misleading document, as recommended by the Internal Committee.

#### **APPEAL**

Any person aggrieved from the recommendations of the IC, may prefer an appeal to the Labor Commissioner within ninety (90) days of the recommendations given by the IC.

#### **CONFIDENTIALITY**

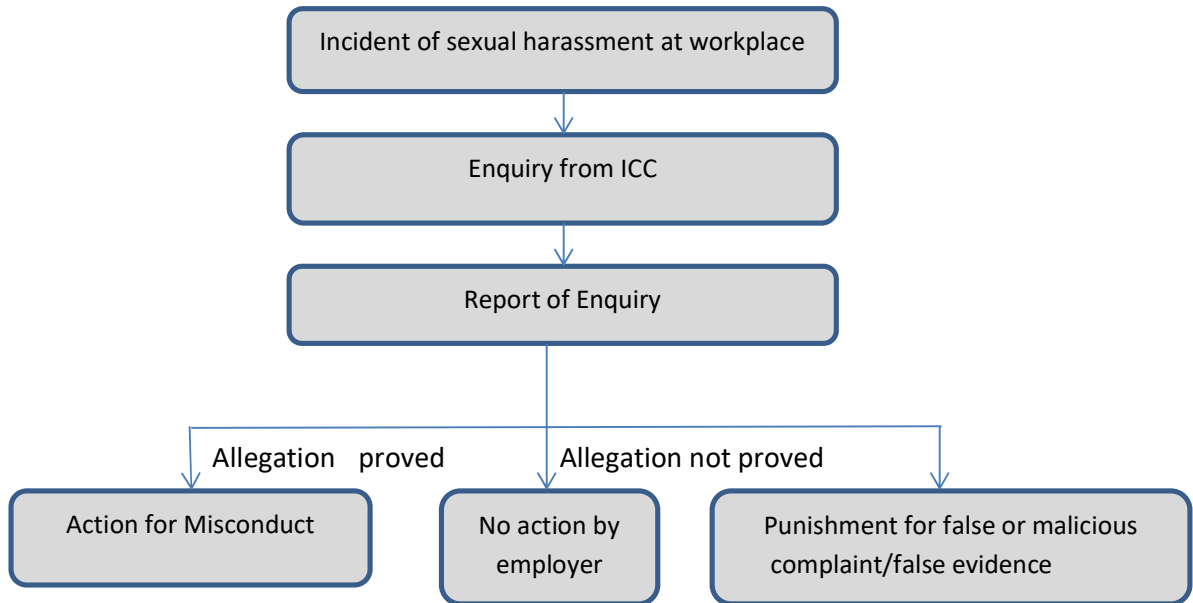
Any person including the witness known to the incident or who has any knowledge about the contents of the complaint shall ensure strict confidentiality. No such information shall be published or communicated in any manner whatsoever, including (but not limited to), publication in Orient Technologies Ltd Intranet portal or any internal messaging service, through email or any other social media. Orient Technologies Ltd shall take strict disciplinary action against any person who is found to have breached their duty of confidentiality, including imposition of a penalty as prescribed under the Act.

#### **DISCIPLINARY ACTION**

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against the accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

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**Procedure to be followed**



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