

**KOOLKING INDUSTRIES INDIA LIMITED**

(Formerly known as Koolking Industries India Private Limited,
which was earlier known as Koolking Udhog Private Limited)

CIN : U28129PB2008PLC031668

Registered Office : Village Ratolan, Dhuri Road,
Malerkotla - 148 023, Punjab, INDIA

Koolking Industries India Limited**POLICY ON PREVENTION OF SEXUAL HARASSMENT**

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CIN: U28129PB2008PTC031668

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1. INTRODUCTION:

Koolking Industries India Limited (“Company”) 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. The Company operates 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.

In order to address and take remedial measures against sexual harassment of women at workplace, an Act has been enacted titled “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“the Act”) with the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“the Rules”) thereunder. The provisions of the Act are applicable to every organization, dwelling place or house, which employs women on regular, contract or daily wage basis for carrying out any work.

2. DEFINITION OF SEXUAL HARASSMENT:

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 behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or in appropriate touching.
- Physical violence, including sexual assault
- 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
- Demand or request for sexual favours
- 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 suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. The Company recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

The Company 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 the Company, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within the Company's premises or outside, including at social events, business trips, training sessions or conferences sponsored by the Company.

3. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE AND RESPONSIBILITIES:

- i. The Internal Complaints Committee shall consist of the following members to be nominated by the Company, namely:
 - a) Presiding officer, who shall be a woman employed at a senior level at workplace from amongst the employees. In case a senior level woman is not available the presiding officer shall be nominated from other offices. In case if 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 department or organisation;
 - b) Not less than 2 members from amongst employees preferably committed to the cause of women, who have had experience in social work or have legal knowledge;
 - c) One member from amongst NGOs, or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.
 - d) At least one half of the total members shall be women. The members will hold office for such period not exceeding 3 years.

- ii. The internal Committee shall discharge all functions and responsibilities as mandated by the Act and Rules.
- iii. The Member appointed from amongst the non-governmental organisations or associations shall be paid such fees or allowances for holding the proceedings of the Internal Committee
- iv. Where the Presiding Officer or any Member of the Internal Committee, —
 - (a) contravenes the provisions of section 16; or
 - (b) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him; or
 - (c) he has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him; or
 - (d) has so abused his position as to render his continuance in office prejudicial to the public interest,such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination
- v. Where the offices or administrative units of the workplace are located at different places or divisional or sub-divisional level, the Internal Committee shall be constituted at all administrative units or offices.

4. COMPLAINTS PROCEDURES:

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Koolking Industries India Limited recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, he/she may make, in writing, a complaint of sexual harassment at workplace to the Internal Committee 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. This period can be extended by the Internal Committee for reasons recorded in writing.

Where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Committee, as the case may be, shall render all reasonable assistance to the woman for making the complaint in writing.

Where the aggrieved employee is unable to make a complaint on account of their physical incapacity, a complaint may be filed by a) a relative or friend; or b) a co-worker; 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 the written consent of the aggrieved person.

complaint may be filed by a) a relative or friend; or b) a special educator or c) a qualified psychiatrist or psychologist; or d) the guardian or authority under whose care they are receiving treatment or care; or e) any person who has knowledge of the incident jointly with any of the above.

Where the aggrieved employee on 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 their written consent.

Where the aggrieved employee is dead, a complaint may be filed by any person who has knowledge of the incident, with the written consent of their legal heir.

Throughout the complaint's procedure, a victim is entitled to be helped by a counsellor within the Company. Koolking Industries India Limited will nominate a person from senior management and provide him with special training to enable him to assist victims of sexual harassment. Koolking Industries India Limited recognizes that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. Koolking Industries India Limited understands the need to support victims in making complaints.

5. CONCILIATION

The Internal Committee may before initiating an inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation provided that no monetary settlement shall be made as a basis of conciliation.

Where settlement has been arrived at, the Internal Committee shall record the settlement so arrived and forward the same to the employer to take action as specified in the recommendation.

The Internal Committee shall provide the copies of the settlement to the aggrieved woman and the respondent.

Where a settlement is arrived at, no further inquiry shall be conducted by the Internal Committee.

6. PROCEDURE FOR DEALING WITH COMPLAINTS OF SEXUAL HARASSMENT:

The procedure for dealing with complaints of sexual harassment shall be as per the procedure laid down

under sections 10 to 16 of the Act read with the relevant Rules.

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.

7. COMMITTEE TO SUBMIT ANNUAL REPORT

The Internal Committee shall in each calendar year prepare an annual report and it should include the number of cases filed, if any and submit it to the District Officer.

Statutory Disclosure

The Company shall make necessary disclosures as required under the Act in its Board's Report in accordance with the applicable provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the rules framed thereunder, and Section 134 of the Companies Act, 2013, including disclosures relating to sexual harassment complaints and the gender-wise composition of employees.

Additionally, pursuant to the Schedule V of the SEBI Listing Regulations, the Company shall disclose in the corporate governance section of the annual report, following disclosures in relation to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

- a. number of complaints filed during the financial year
- b. number of complaints disposed of during the financial year
- c. number of complaints pending as on end of the financial year.

8. IMPLEMENTATION OF THIS POLICY:

Koolking Industries India Limited will ensure that this policy is widely disseminated to all relevant persons. 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, Koolking Industries India 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.

9. MONITORING AND EVALUATION:

Koolking Industries India 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.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the Company will evaluate the effectiveness of this policy and make any changes needed.

10. EFFECTIVE DATE:

This Policy has been approved by the Board of Directors and is effective from 05.09.2026

11. 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 or may make an amendment as and when require.

12. DISCLOSURES:

The Company shall disclose the Policy on its website.

For Koolking Industries India Ltd.


Company Secretary

