



DCM SHRIRAM LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT

(Updated Version – May 2026)

1. OBJECTIVE

DCM Shriram Limited (hereinafter “Company”) is committed to providing a working environment that is free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment.

Sexual harassment at workplace is discriminatory, unlawful and violates the standard of behavior expected of all persons associated in a work environment. We respect the dignity of everyone involved in our workplace. At DCM Shriram, all individuals are required to ensure that they maintain mutual respect and positive regard towards one another.

The Company adopts a gender-neutral approach to prevention and redressal of workplace harassment, while ensuring compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. Accordingly, while statutory protection under the Act applies to women, this Policy extends its principles of protection to all employees irrespective of gender, gender identity or sexual orientation.

2. SCOPE

The Policy is applicable to all employees which includes employees working 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.

The Policy shall also extend to consultants, interns, visitors, clients, vendors and any other person interacting with the Company at the workplace.

This Policy applies irrespective of gender and covers all individuals at the workplace.

DCM SHRIRAM LTD.

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“Workplace” includes:

- any office, factory, unit or branch of the Company
- any place visited by the employee arising out of or during the course of employment including transportation provided by the employer
- any virtual or digital work environment including work-from-home, official communication channels (email, messaging platforms), and online meetings

3. POLICY STATEMENT

3.1 All employees at DCM Shriram will maintain high standards of dignity, respect and positive regard for one another in all their dealings.

3.2 All employees at DCM Shriram will understand and appreciate the rights of the individual to be treated with dignity.

3.3 All employees at DCM Shriram are expected to maintain a work environment, which is free from any kind of harassment.

3.4 The Company has zero tolerance for sexual harassment and any form of retaliation against individuals who report concerns or participate in an inquiry.

4. DEFINITION OF SEXUAL HARASSMENT

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

- physical contact and advances
- a demand or request for sexual favours
- making sexually coloured remarks
- showing pornography
- any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances if occurring or present in relation to any act or behaviour of sexual harassment, may amount to Sexual Harassment :

- implied or explicit promise of preferential treatment in employment
- implied or explicit threat of detrimental treatment in employment
- implied or explicit threat about present or future employment status

- interference with work or creating intimidating or offensive work environment
- humiliating treatment likely to affect health or safety

5. INTERNAL COMMITTEE (IC)

In compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the Company has set up an Internal Committee (IC) for managing the process of investigations and redressal of sexual harassment complaints.

A senior woman employee shall head the Committee and not less than half of its members shall be women. The Committee shall also include an external member.

The Company may constitute multiple Internal Committees across locations/business units, as required.

The tenure of IC members shall not exceed three years and shall be reviewed periodically.

The IC shall have the authority to conduct inquiries through physical, virtual or hybrid means.

6. ROLES AND RESPONSIBILITIES

a. Employer

It is the responsibility of the Employer to:

- i. provide a safe working environment at the workplace
- ii. display at the workplace penal consequences of sexual harassment;
- iii. provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry
- iv.. assist in securing the attendance of respondent and witnesses
- v. make available such information to the Internal Committee as it may require
- vi. provide assistance to the aggrieved woman if she so chooses to file a complaint under applicable law
- vii. conduct regular awareness and sensitization programs for employees on prevention of sexual harassment

viii. ensure that all employees, including contractual staff and vendors, are aware of this Policy

7. PROCEDURE FOR RESOLUTION, SETTLEMENT OR PROSECUTION

Procedure for filing the Complaint

- i. Any aggrieved person may make a formal complaint to the Presiding Officer or any member of the IC within a period of three months from the date of the incident or last incident as may be applicable.
- ii. Complaints may be submitted in writing or through email or any digital mode as may be prescribed by the Company.
- iii. The complainant shall submit supporting documents, if any, along with details of witnesses.
- ivi. The IC may extend the time limit for filing the complaint beyond prescribed time if justified.

Conciliation

The IC may, before initiating an inquiry and at the request of the complainant, take steps to settle the matter between the complainant and respondent through conciliation. No monetary settlement shall be made.

Inquiry

If there is no conciliation, IC shall make inquiry into the complaint

During the pendency of an inquiry, the IC may recommend to the employer:

- transfer of either party to any other workplace
- grant leave to the aggrieved person up to three months
- restrain the respondent from reporting on the work performance of the aggrieved person
- any other appropriate relief

The inquiry shall be conducted and completed within timelines prescribed under law and principles of natural justice shall be followed.

The IC may conduct proceedings through virtual mode where required.

8. ACTION FOR SEXUAL HARASSMENT

On completion of the inquiry, the IC shall provide its report to the Employer.

Where the allegation is proved, the Employer shall take appropriate action, including:

- written apology
- warning
- reprimand
- withholding of promotion or increments
- termination
- counselling

False or malicious complaints, if proved after inquiry, will attract.

The Company shall also take corrective measures to address systemic issues, if any, identified during the inquiry.

9. CONFIDENTIALITY

Information relating to the complaint, identity of the parties, witnesses and proceedings shall be kept confidential.

Any breach of confidentiality, including through digital or social media, shall attract disciplinary action.

10. ANNUAL REPORT

The IC shall prepare an annual report including:

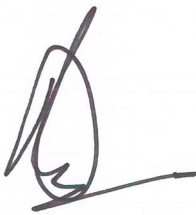
- number of complaints received
- number of complaints disposed of
- number of complaints pending
- awareness programs conducted
- action taken

The Company may include relevant disclosures in its statutory and ESG reports, as applicable.

11. GENERAL

Any term or aspect not specifically defined or set out in this Policy shall be construed to mean what is laid down under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act or Rules.

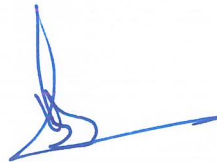
This Policy shall be reviewed periodically to ensure alignment with legal requirements and organizational best practices.



Aditya Shriram



Ajit Shriram



Vikram Shriram



Ajay Shriram

1st May 2026

Note:

The composition of the Internal Committee shall be updated periodically and notified separately by the Company.