

THRIVE FUTURE HABITATS LIMITED

(Formerly Known as Ador Multiproducts Limited)

CIN: L85110DL1948PLC465696

www.thrivefuturehabitats.com



Policy on Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace

(Revised on August 5, 2026)

Pursuant to Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013

1. INTRODUCTION

The Company is committed to creating and maintaining a healthy, safe and productive work environment free from discrimination and harassment. The Company is committed to providing a work environment that ensures every person at the workplace is treated with dignity, respect and afforded equal treatment.

The Company does not tolerate any form of discrimination, victimization or harassment, including sexual harassment, and is committed to taking all necessary steps to ensure that no person is subjected to any form of sexual harassment at the workplace.

This Policy has been formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder, as amended from time to time.

The objective of this Policy is to:

- a) prevent sexual harassment at the workplace;
- b) provide protection against sexual harassment;
- c) provide an effective complaint redressal mechanism;
- d) promote a safe, secure and dignified work environment; and
- e) ensure compliance with applicable laws.

2. APPLICABILITY

This Policy applies to all persons engaged with the Company for any work on regular, temporary, ad-hoc, contractual, retainerhip, consultancy, probationary, trainee, apprenticeship or internship basis, either directly or through an agent and includes employees, directors, contract workers, consultants, visitors, customers, business associates and other persons interacting with the Company.

This Policy shall apply to all workplaces of the Company and to any place visited by a person arising out of or during the course of employment, including transportation, business travel, meetings, conferences, training programmes, work-related events and virtual workplace interactions.

3. DEFINITIONS

- a) **“Company”** shall mean Thrive Future Habitats Limited (Formerly Ador Multiproducts Limited).
- b) **“Internal Committee”** or **“IC”** shall mean the Internal Committee constituted by the Company in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- c) **“Policy”** shall mean this Policy on Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace.

Words and expressions used but not defined in this Policy shall have the meanings respectively assigned to them under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder, as amended from time to time.

4. SEXUAL HARASSMENT

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

- a) physical contact and advances;
- b) demand or request for sexual favours;
- c) making sexually coloured remarks;
- d) showing pornography; or
- e) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.

The following circumstances, among others, if occurring in relation to or connected with any act or behaviour of sexual harassment, may amount to sexual harassment:

- i. implied or explicit promise of preferential treatment in employment;
- ii. implied or explicit threat of detrimental treatment in employment;
- iii. implied or explicit threat regarding present or future employment status;
- iv. interference with work or creation of an intimidating, offensive or hostile work environment; or
- v. humiliating treatment likely to affect health, safety or dignity.

5. PREVENTION OF SEXUAL HARASSMENT

All persons covered under this Policy are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with others.

Every person shall:

- a) treat others with dignity and respect;
- b) refrain from any unwelcome behaviour having sexual connotation;
- c) refrain from creating a hostile work environment;
- d) promote a workplace free from sexual harassment; and
- e) promptly report incidents of sexual harassment experienced or witnessed.

The Company shall take appropriate measures to prevent sexual harassment at the workplace, including organizing awareness programmes, sensitization sessions and training programmes as may be considered necessary.

6. INTERNAL COMMITTEE

The Company shall constitute an Internal Committee in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The Internal Committees shall consist of the following members to be nominated by the employer, namely:—

- a) Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees:

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace referred to in sub-section(1):

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 department or organisation;

- b) not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- c) one member from amongst non-governmental organisations 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.

7. COMPLAINT MECHANISM

An aggrieved woman may make a complaint in writing to the Internal Committee within three months from the date of the incident and, in case of a series of incidents, within three months from the date of the last incident, or within such extended period as may be permitted under applicable law.

Where permitted under law, a complaint may also be made by any other person authorised to act on behalf of the aggrieved woman.

The Internal Committee shall provide reasonable assistance to the complainant in filing a complaint, wherever required.

8. CONCILIATION

Before initiating an inquiry, the Internal Committee may, at the request of the complainant, take steps to settle the matter through conciliation.

No monetary settlement shall form the basis of conciliation.

Where a settlement is arrived at, the Internal Committee shall record the settlement and forward the same to the Company for necessary action in accordance with applicable law.

9. INQUIRY PROCESS

Where conciliation is not requested or the matter is not resolved through conciliation, the Internal Committee shall conduct an inquiry in accordance with:

- a) the provisions of applicable law;
- b) principles of natural justice; and
- c) applicable service rules and policies of the Company.

Both parties shall be provided a fair opportunity to present their case.

The Internal Committee shall complete the inquiry and submit its report within the timelines prescribed under applicable law.

10. INTERIM RELIEF

During the pendency of an inquiry, the Internal Committee may recommend to the Company such interim relief as may be permissible under applicable law, including:

- a) transfer of either party;
- b) leave to the complainant;
- c) change of reporting structure;

- d) restraining certain interactions; or
- e) any other relief as may be considered appropriate.

The Company shall consider and implement such recommendations in accordance with applicable law.

11. INQUIRY REPORT AND ACTION

Upon completion of the inquiry, the Internal Committee shall submit its findings and recommendations to the Company.

Where allegations are proved, the Company may take appropriate disciplinary action including:

- a) warning;
- b) reprimand or censure;
- c) counselling;
- d) withholding promotion, increment or benefits;
- e) transfer;
- f) suspension; or
- g) termination of employment,

or any other action permissible under applicable law.

Where the conduct complained constitutes an offence under applicable law, appropriate legal action may also be initiated.

12. CONFIDENTIALITY

The contents of the complaint, identity of the complainant, respondent and witnesses, information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and action taken pursuant thereto shall be treated as confidential and shall not be published, communicated or made known except as permitted under applicable law.

Any breach of confidentiality may invite disciplinary action in accordance with applicable law.

13. PROTECTION AGAINST RETALIATION

The Company does not tolerate retaliation or victimization against any person who, in good faith:

- a) files a complaint;
- b) raises a concern;
- c) provides information or evidence;
- d) participates in proceedings; or
- e) assists in any investigation conducted under this Policy.

Any act of retaliation shall be treated as misconduct and may result in disciplinary action.

14. FALSE OR MALICIOUS COMPLAINTS

If the Internal Committee concludes that a complaint has been made maliciously or that false evidence has been knowingly produced, it may recommend action in accordance with applicable law.

However, mere inability to substantiate a complaint or provide adequate proof shall not attract action against the complainant.

15. ROLES AND RESPONSIBILITIES

Employees shall:

- a) maintain a respectful workplace;
- b) comply with this Policy;
- c) cooperate with inquiries conducted under this Policy; and
- d) promptly report incidents or concerns.

The Internal Committee shall:

- a) receive and address complaints;
- b) conduct fair and impartial inquiries;
- c) maintain confidentiality;
- d) submit reports and recommendations; and
- e) perform such functions as may be prescribed under applicable law.

The Company shall:

- a) provide a safe working environment;
- b) conduct awareness and sensitization programmes;
- c) facilitate the functioning of the Internal Committee;
- d) provide necessary assistance for conducting inquiries; and
- e) comply with statutory requirements under applicable law.

16. LIMITATION, REVIEW AND AMENDMENT

In the event of any inconsistency or conflict between the provisions of this Policy and the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the rules framed thereunder or any other applicable law, the provisions of such law shall prevail and this Policy shall be deemed to have been modified to the extent necessary to give effect to such provisions.

The Board of Directors may amend this Policy from time to time.

Any amendment, modification, clarification, circular, notification or re-enactment of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder shall automatically apply to this Policy and the relevant provisions of this Policy shall be deemed to have been modified accordingly.

17. EFFECTIVE DATE

This Policy shall be effective from the date of its approval by the Board of Directors of the Company.

18. DISSEMINATION OF POLICY

This Policy will be hosted on the website of the Company.