SUCCINNOVA TECHNOLOGIES LIMITED

(Formerly known as Succinnova Technologies Private Limited)

CIN: U74900KA2015PLC079361

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POLICY ON PREVENTION OF SEXUAL HARASSMENT

Effective Date	**:**	07 August 2026

POLICY ON PREVENTION OF SEXUAL HARASSMENT

1. Introduction:

Succinnova Technologies 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. Succinnova Technologies 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 acomplaint.

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

2.1 Physical conduct

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

2.2 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)

2.3 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 Succinnova Technologies Limited 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.

Succinnova Technologies 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 Succinnova Technologies Limited, 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 Succinnova Technologies Limited premises or outside, including at social events, business trips, training sessions or conferences sponsored by Succinnova Technologies Limited.

3. Complaints procedures:

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Succinnova Technologies 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 can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc. When a designated person receives a complaint of sexual harassment, he/shewill:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands the Company's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework

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

3.1 Informal complaints mechanism:

If the victim wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged harasser to respond to the complaint
- ensure that the alleged harasser 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 designated mediator within the company to resolve the matter
- 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

3.2 Formal complaints mechanism:

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, 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 victim and the alleged harasserseparately
- interview other relevant third partiesseparately
- decide whether or not the incident(s) of sexual harassment tookplace
- produce a report detailing the investigations, findings and anyrecommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.-an apology, a change to working arrangements, a promotion if the victim 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 theoutcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of theworkplace
- keep a record of all actionstaken
- ensure that the all records concerning the matter are keptconfidential
- ensure that the process is done as quickly as possible and in any event within 7 days of the complaint beingmade

3.3 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.

4. 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 writtenwarning
- adverse performanceevaluation
- reduction inwages
- 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.

5. Implementation of this policy:

Succinnova Technologies 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, Succinnova Technologies 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.

6. Monitoring and evaluation:

Succinnova Technologies 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.

7. Effective Date

This Policy is effective from the date of approval of the same by the Board of Directors of the Company.

8. 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.

9. Disclosures

The Company shall disclose the Policy on its website.

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