



**PREVENTION OF SEXUAL
HARASSMENT AT WORKPLACE**

**(POSH)
SEXUAL HARASSMENT AT WORKPLACE
(PREVENTION, PROHIBITION AND REDRESSAL) POLICY**

DATED: 29.07.2025

INTRODUCTION:

This policy is titled the “**Policy on Prevention of Sexual Harassment (POSH)**” and is issued in compliance with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** (hereinafter referred to as “the Act”).

This policy is adopted jointly by the following group companies/LLPs (hereinafter collectively referred to as “**Ace Group**”):

1. Ace Infracity Developers Private Limited;
2. Star Landcraft Private Limited;
3. Jam Vision Tech Private Limited;
4. Three C Homes Private Limited;
5. Ace Mega Structures Private Limited;
6. Ajay Realcon India LLP;
7. Starcity Builders and Promoters LLP.

These entities operate from a **common office premises located at: Ace Studio, Plot No. 01B, Sector-126, Noida, Gautam Buddha Nagar, UP-201303.**, and share **centralized Human Resources and administrative functions.**

Please note that 'workplace' as defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 would include any undertaking, establishment, unit, office, place of business of the Company and any place visited by an employee arising out of or during the course of employment including transportation provided by the employer for undertaking such a journey.

As required by applicable law in India, including without limitation the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, ("Rules"), Ace Group has framed this 'Policy on Prevention and Redressal of Sexual Harassment at the Workplace' ("Policy"). All employees of the group shall adhere to this Policy in letter as well as spirit. In case any aspect in this Policy is inconsistent with the Act and Rules, the provisions of the Act and Rules shall prevail.

COMMITMENT:

Ace Group is committed to provide its employees a workplace free from sexual harassment. This policy prohibits all employees or any person at the workplace of Ace Group from engaging in unwelcome sexual conduct or making unwelcome sexual overtures, visual, verbal, or physical. Such conduct has the purpose, or effect of interfering with an employee's work performance or creating an intimidating, hostile, or offensive work environment.

Ace Group is committed in providing work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

Ace Group is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

Ace Group shall not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

APPLICABILITY AND SCOPE:

This policy applies to all categories of employees of Ace Group, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites, female vendors and clients visiting any workplace of Ace Group.

This Policy is applicable to:

1. All offices or other premises where Ace Group's business is conducted.
2. All group related activities performed at any other site away from the Group premises.

Ace Group will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

DEFINITION OF SEXUAL HARASSMENT:

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment includes:

1. Unwelcome sexual advances (verbal, written or physical)
2. Demand or request for sexual favours.
3. Any other type of sexually-oriented conduct.
4. Showing Pornography.
5. Verbal abuse or 'joking' that is sex-oriented.
6. Any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Complainant: - Includes any aggrieved women as defined in section 2(a)(1) of SHWW Act.

Complaint Committee: Means the Internal Complaint Committee as constituted under this policy.

Accused: Means an individual or group of individuals against whom a complaint has been filed by the complainant.

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT:

All employees of Ace Group have a personal responsibility to ensure that their behaviour is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

COMPLAINT MECHANISM:

An appropriate complaint mechanism in the form of "Complaints Committee" has been created in Ace Group for time-bound redressal of the complaint made by the victim.

COMPLAINT COMMITTEE:

Ace Group has instituted an Internal Complaints Committee ("Committee") for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Committee will comprise of the following members out of which at least one member will be of the same gender as that of the complainant and one half of the members shall be women at all times.

Name	Designation	Email ID	Contact
Ms. Garima Arora	Presiding Officer	Garima.arora@acegroupindia.com	8377900720
Ms. Rajni Aarya	Internal Member	Rajni.aarya@acegroupindia.com	9971450451
Mr. Sandip Kumar Ghosh	Internal Member	Sandip.ghosh@acegroupindia.com	9818468885
Ms. Mitali Yadav	External Member	mitali@albalawoffices.com	9599988414

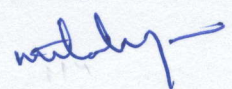
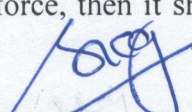
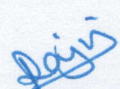
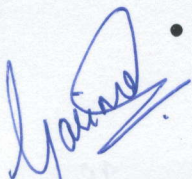
The Committee is responsible for:

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment-related sexual harassment.

PROCEDURE FOR COMPLAINTS:

The Complainant on facing such harassment, shall follow the following procedure to raise the Complaint:

- When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.
- If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern by filing a formal complaint in writing to the Presiding officer or to any member of the Committee within three months of the occurrence of the sexual harassment.
- The Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.
- The Presiding Officer of the Committee after receipt of complaint, will proceed to determine whether the allegations made in the complaint fall under the purview of Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013, and if so, the Committee will initiate a formal inquiry, to be completed within 90 days from the receipt of the complaint as per Section 11(4) of the Act.
- Where the conduct of the accused amounts to an offence under the SHWW Act or any other law for the time being in force, then it shall be the responsibility of the



presiding officer to take appropriate action and file complaint against him with the appropriate authority.

- Pursuant to the completion of enquiry, the complaint committee shall submit its report within ten days to the employer and thereafter the employer shall take the decision within 60 days of report submission.
- If after investigation it is found that an offence has been committed under the SHWW Act, then the following actions shall be taken against the Accused:
 1. Change of work assignment / transfer for either the perpetrator or the victim.
 2. Suspension or termination of services of the Accused.
 3. Formal Apology with a monetary penalty as determined in Section 15 of the Act, and may be recovered by deducting such amount from the salary or wages of the respondent as deem appropriate to be paid to the aggrieved woman.
- In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

FALSE ACCUSATIONS:

Ace Group recognizes false accusations of Sexual Harassment or forgoing of evidence can have a serious effect on innocent persons. If the inquiry results in a finding that Aggrieved Employee lodging the Complaint knowingly and/or maliciously made false accusations of harassment and/or that any of the witnesses had knowingly made false statements or gave false evidence, the Committee may recommend appropriate action against the Complainant as per Section 14 of the Act.

CONFIDENTIALITY:

Ace Group understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

Notwithstanding anything contained in the Right to Information Act 2005, the contents of the complaint, the name and address of the aggrieved women, the name of the accused and the information relating to proceedings shall not be disclosed or published in any manner.

PROTECTION TO COMPLAINANT/VICTIM:

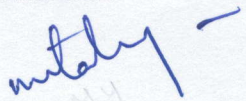
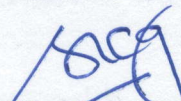
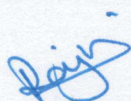
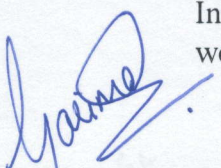
Ace Group is committed in ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

Ace Group will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

CONCLUSION:

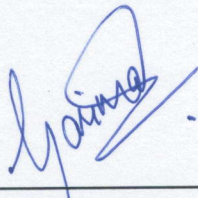
In conclusion, Ace Group reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with



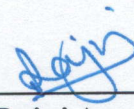
dignity and respect. Ace Group also ascertains to display at every conspicuous place in the workplace, the penal consequences of sexual harassment.

DISCLAIMER

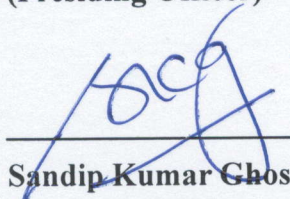
The provisions of this policy may change from time to time to be in line with the amendments under the SHWW Act 2013.



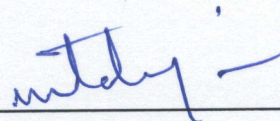
Garima Arora
(Presiding Officer)



Rajni Aarya
(Internal Member)



Sandip Kumar Ghosh
(Internal Member)



Mitali Yadav
(External Member)