

**POLICY ON PREVENTION
AND REDRESS OF
SEXUAL HARASSMENT
AT WORKPLACE**

Adopted on: - 28th April, 2026

Policy on Prevention of Sexual Harassment

Western Overseas Study Abroad 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. Western Overseas Study Abroad 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 a complaint.

Definition of sexual harassment:

1. Sexual Harassment would mean any or one or more of the following unwelcome acts or behavior (whether directly or by implication) but not limited to:
 - a. Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:
 - i. Physical Contact and advances
 - ii. Demand or request for sexual favours
 - iii. Sexually colored remarks, including but not limited to vulgar /indecent jokes, letters, phone calls, text messages, e-mails, gestures, etc.
 - iv. Showing pornography or the likes
 - v. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.
 - vi. Physical contact and advances such as touching, stalking, and sounds which have explicit or implicit sexual nature/ connotation/ overtones in the work area and work-related areas.
 - vii. Verbal or Non-Verbal communication which offends the individual's sensibilities and affect her/ his performance and has sexual connotation/ overtone/ nature
 - viii. Teasing, Voyeurism, innuendos and taunts, physical confinement and/or touching against one's will and likely to introduce upon one's privacy.
 - b. The following circumstances, among other circumstances, if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment:
 - i. Implied or explicit promise of preferential in the employment
 - ii. Implied or explicit threat or detrimental treatment in the employment
 - iii. Implied or explicit threat about the present or future employment status
 - iv. Interference with the work or creating an intimidating, offensive, or hostile work environment
 - v. Humiliating treatment likely to affect health or safety An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.
2. Workplace includes all Company premises and shall include any place visited by the employee in the course of employment including transportation provided by the employer for undertaking such journey.
3. Respondent means a person against whom the aggrieved person has made a complaint.

4. Aggrieved Person means a person in relation to workplace whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

All sexual harassment is prohibited whether it takes place within Western Overseas Study Abroad Limited premises or outside, including at social events, business trips, training sessions or conferences sponsored by Western Overseas Study Abroad Limited.

Prohibited Conduct

Sexual Harassment is defined under the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013. Non-sexual Harassment includes but not limited to offensive language, derogatory comments, bullying, intimidation, or discrimination based on gender, sex, race, ethnicity, nationality, or any other characteristic.

Responsibilities Regarding Sexual Harassment

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Complaints procedures

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

Corrective Action

It may include any of the following:

- i. Written Apology: Obtain a formal written apology from the respondent.
- ii. Disciplinary Action: Issuing a warning or reprimand to the respondent.
- iii. Career Impact: Withholding promotions or increments.
- iv. Change of work/Location: Change of work assignment/transfer for either the respondent or aggrieved person.
- v. Suspension or Termination: Temporary Suspension from services of the employee until found guilty of the offense
- vi. Termination: Terminate the respondent's employment, if warranted by the severity of the case.
- vii. Penalty: Deduction from salary for compensation to the aggrieved employee, as deemed appropriate
- viii. Counseling: Access to counseling or employee assistance programs for victims of harassment through On-Site Support i.e. Availability of trained Labour Welfare Officers and Industrial Psychologists at each unit to assist.

In case the complaint is found to be false or malicious intent, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the management. Implementation of this policy.

Appeal

Any person aggrieved from the recommendations of the ICC under the provisions above, or non-implementation of such recommendations may prefer an appeal to appellate authority as prescribed under law.

Training & Awareness

Western Overseas Study Abroad 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, Western Overseas Study Abroad 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.

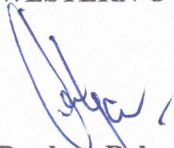
Monitoring and evaluation

Western Overseas Study Abroad 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.

Note: Approved in the Board Meeting held on April 28, 2026

**For and on behalf of
WESTERN OVERSEAS STUDY ABROAD LIMITED**



**Pardeep Balyan
Managing Director
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