7SEAS ENTERTAINMENT LIMITED
POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE

(Approved/Amended by the Board of Directors on 18 July 2026)

CIN: L72900TG1991PLC013074

Registered Office: 5th Floor, Plot Nos. 92, 93 and 94, Kavuri Hills, Madhapur, Hyderabad, Telangana – 500081

Classification: Public – to be hosted on the Company's website

1. Commitment and legal basis

The Company is committed to a workplace free from sexual harassment and adopts this Policy under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and applicable rules. Retaliation and victimisation are prohibited.

2. Scope and workplace

The Policy protects women covered by law and applies to directors, employees, trainees, consultants, visitors and other persons at offices, work travel, events, virtual workplaces, transport and any place arising out of employment.

3. Sexual harassment

Sexual harassment includes unwelcome physical contact, advances, requests for sexual favours, sexually coloured remarks, showing pornography and other unwelcome physical, verbal or non-verbal sexual conduct, including implied employment threats or benefits and creation of a hostile environment.

4. Internal Committee

The Company shall constitute an Internal Committee with a senior woman Presiding Officer, employee members and an external member experienced in relevant issues, meeting statutory composition and tenure. Names and contact details shall be displayed.

5. Complaint and assistance

A written complaint may be made within the statutory period, with extension for recorded reasons. The Committee shall assist in writing the complaint where necessary. Conciliation may occur only at the complainant's request and shall not involve monetary settlement.

6. Inquiry and interim relief

Inquiry shall follow natural justice, confidentiality and statutory timelines. Parties shall have opportunity to present evidence. Interim transfer, leave, reporting change or other relief may be recommended without prejudging the matter.

7. Findings and action

The Committee shall issue its report and recommendations. Proven misconduct may result in disciplinary action and compensation; malicious complaints may be addressed only where malicious intent is established, not merely because the complaint is unproved.

8. Confidentiality, reporting and prevention

Identity, proceedings and recommendations shall remain confidential except as permitted. The Company shall conduct awareness programmes, support the Committee and include required disclosures in the Board's Report.

9. Interpretation and overriding effect

Terms not specifically defined in this Policy shall have the meanings assigned to them under the Companies Act, 2013, the rules made thereunder, the applicable SEBI regulations and other governing law. References to statutes and regulations include amendments, clarifications, circulars and re-enactments. If any provision of this Policy conflicts with applicable law, the law shall prevail and this Policy shall be read as modified to the minimum extent necessary.

10. Administration and responsibility

The Board shall retain overall responsibility for this Policy. The committee or officer identified in this Policy shall administer it, maintain evidence of compliance and report material deviations. Every director, officer, employee, consultant and service provider within scope shall provide information and cooperation reasonably required for implementation.

11. Records, training and assurance

The Company Secretary/Compliance Officer shall ensure that approvals, registers, declarations, notices, reports, training records and supporting documents are retained for the period prescribed by law and the Company's document-retention schedule. Periodic awareness and role-based training shall be conducted. Internal audit or an independent reviewer may test compliance and recommend corrective action.

12. Review and amendment

This Policy shall be reviewed at least annually and earlier upon a material change in law, business model, organisation, risk profile or regulatory guidance. Material amendments shall be placed before the competent committee and the Board. The Managing Director and Company Secretary/Compliance Officer may jointly make clerical, contact-detail and statutory-reference corrections that do not alter substantive rights or obligations, subject to reporting to the Board.

For 7Seas Entertainment Limited
Company Secretary / Compliance Officer

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