

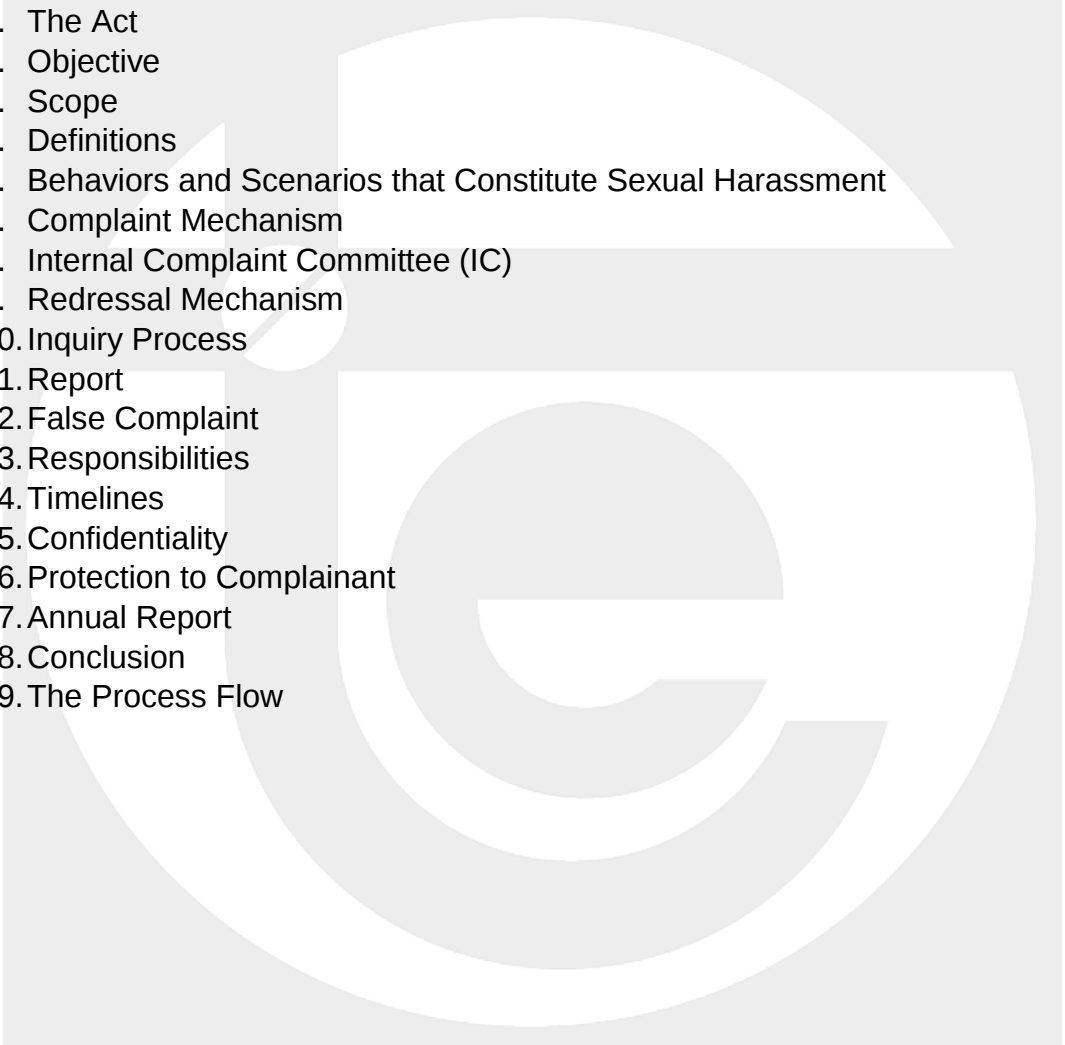


TECHNO ELECTRIC & ENGINEERING
COMPANY LIMITED

Prevention of Sexual Harassment (POSH) Policy

Policy No. – TEECL/SHP/02

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1. Introduction

Techno Electric & Engineering Co. Ltd. (TEECL) recognizes the right of every women employee to be able to attend work and to perform their duties without being subjected to any form of sexual harassment.

Techno Electric 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 based on the outcome of investigation and complaint committee recommendation.

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.

It is also the obligation and responsibility of every employee to ensure that the workplace is free from sexual harassment.

Techno Electric reserves right to amend, abrogate, modify, & / or rescind the policy or any part of it at any time,

2. The Act

The sexual harassment policy is meant to serve as guidelines for the employees of TEECL, subject to the provision of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and the Rules formed thereafter.

The Act accentuates the fundamental rights of women to equality and her right to live with dignity as provided in Articles 14, 15 and 21 of the Constitution of India. This Act came into force by the Government of India in 2013, notifying the protection available to women employees against sexual harassment and aspires to ensure women's right to workplace equality and free from sexual harassment through compliance with Prevention, Prohibition and Redressal.

3. Objectives:

The purpose of this document is to outline TEECL's position on sexual harassment and to document the process which is to be followed if any grievances arise.

1. TEECL is committed to create a safe environment where Employees are treated with respect and dignity. TEECL takes a strong stand and has a zero tolerance policy on the issue of sexual harassment in the Workplace. Any form of sexual harassment is strictly prohibited at TEECL and all individuals are responsible for helping towards assuring a Workplace free of harassment.



This Policy on Prevention of Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) ("Policy") has been framed in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules framed thereunder (hereinafter referred to as "POSH Act" and "POSH Rules" respectively) in 2013, and with the intention of providing a sexual harassment free environment and addresses the prevention and redressal of sexual harassment at the Workplace for all Employees of the Company in India.

Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action. Accordingly, while the policy covers all the key aspects of the Act, for any further clarification reference shall always be made to the Act and the provisions of the Act shall prevail.

POSH Act specifically deals with the protection of women against sexual harassment, TEECL strongly believes that all Employees, regardless of their gender, have the right to work in an environment safe from verbal or physical abuse and unsolicited or unwelcome sexual overtures.

Keeping the objective as the focus, the Company has adopted this Policy with a gender-neutral approach. The Company is committed to provide redressal against sexual harassment to all Employees, irrespective of their gender, and to take strict disciplinary action as provided under this Policy against any persons who are perpetrators of any and all forms of sexual harassment, regardless of the gender of the perpetrators.

2. This Policy replaces the earlier version of POSH policy dated 02.04.2018 and comes into force with immediate effect.

4. Scope

This policy addresses the prevention and redressal of sexual harassment incidents (as defined in the further section) at the Workplace (as defined in section 3.0), and is applicable to all Employees (as defined in section 3.0) associated with the Company's operations in India.

- It is clarified that though the law governing this policy is gender specific and is designed for women stakeholders of Workplaces, this Policy, as adopted by this organization, is gender neutral in its approach and will accept sexual harassment at Workplace complaints from all genders.
- This Policy will make specific references to guidelines which are only applicable to women Employees and Complainants, as and where required, keeping in mind the provisions of the POSH Act and POSH Rules. Those specific guidelines will not be applicable to other Complainants, who are not women, since they do not fall under the purview of the POSH Act.



5. Definitions:

Sexual harassment - means any unwelcome sexual advance, request for sexual favours, or other conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, and where that reaction is reasonable in the circumstances.

Aggrieved person or complainant – in relation to this policy, means a person of any age or gender, whether employed or not, who has experienced or has been subjected to any act of Sexual Harassment by the Respondent.

Complaint – means a complaint of Sexual Harassment lodged with the Internal Complaints Committee.

Respondent – means a person against whom a Complaint is made by an Aggrieved person

Employees – Employee for the purpose of this Policy is a person employed at the Workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal Employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are expressed or implied and includes co-worker, a contract worker, probationer, trainee, apprentice, or by any other such name.

Employer - Employer means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees

Workplace – Workplace means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by TEECL or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey.

Internal Committee – means the Internal Committee constituted by TEECL in accordance with the provisions of the Act 2013 for Redressal of a Complaint;



6. Behaviors and Scenarios that Constitute Sexual Harassment:

“Sexual Harassment” includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):

- i. 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:
 - Physical contact and advances;
 - Demand or request for sexual favours;
 - Making sexually coloured remarks or remarks of sexual nature about a person's clothing or body;
 - Showing pornography;
 - Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including but not limited to cat-call, wolf/finger whistle, vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.

Sexual harassment can involve a series of incidents or it can be a one-off occurrence.

- ii. relation to connected with any act or behavior of sexual harassment may amount to sexual harassment:
 - Quid Pro Quo (literally 'this for that');
 - Implied or explicit promise of preferential treatment in employment; or
 - Implied or explicit threat of detrimental treatment in employment; or
 - Implied or explicit threat about the present or future employment status; or
 - Interference with work or creating an intimidating or offensive or hostile work environment for the person; or
 - Humiliating treatment affecting any person's health or safety.

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:

- A. Some examples of behaviour that constitute sexual harassment at the workplace:
 - 1) Making sexually suggestive remarks or innuendos.
 - 2) Serious or repeated offensive remarks, such as teasing related to a person's body or appearance.
 - 3) Offensive comments or jokes.
 - 4) Inappropriate questions, suggestions or remarks about a person's sex life.
 - 5) Displaying sexist or other offensive pictures, posters, mms, SMS, Whatsapp, or e-mails.
 - 6) Intimidation, threats, blackmail around sexual favours.
 - 7) Threats, intimidation or retaliation against an employee who speaks up about unwelcome behaviour with sexual overtones.
 - 8) Unwelcome social invitations, with sexual overtones commonly understood as flirting.
 - 9) Unwelcome sexual advances which may or may not be accompanied by promises or threats, explicit or implicit.
 - 10) Physical contact such as touching or pinching.
 - 11) Caressing, kissing or fondling someone against her will (could be considered assault).
 - 12) Invasion of personal space (getting too close for no reason, brushing against or cornering someone).
 - 13) Persistently asking someone out, despite being turned down.
 - 14) Stalking an individual.
 - 15) Abuse of authority or power to threaten a person's job or undermine her performance against sexual favours.



- 16) Falsely accusing and undermining a person behind closed doors for sexual favours.
- 17) Controlling a person's reputation by rumour-mongering about her private life.

7. Complaint Mechanism:

An appropriate complaint mechanism in the form of Internal Complaints Committee (ICC) has been created in the Company for time-bound redresses of the complaint made by the aggrieved woman.

The company strongly encourages any woman employee who feels they have been sexually harassed and to take immediate action can lodge the complaint through this established mechanism.

Anonymous complains will not mandatorily be taken up for investigation, as stated in the Act.

8. Complaints Committee:

The Company has instituted the Internal Committee (earlier known as Internal Complaints Committee) for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The complaint shall have to be in writing and sent to Chairperson of Complaint Committee in a sealed envelope. Alternately, the employee can send complaint through an email desk.posh@techno.co.in. The complainant shall submit six copies of the complaint and it should contain a description of each incident(s) and include relevant date(s); timings and locations; name of the respondent and working relationship between the parties, names and address of witnesses and evidences if any which the complainant believes to be true and accurate.

The employee is also required to disclose her name, contact number, division, department and location of workplace to enable the Chairperson to contact the employee and take the matter forward.

In case an aggrieved woman is unable to make a Complaint on account of her physical incapacity, a Complaint may be filed by:

- a. Her relative or friend; or
- b. Her co-worker; or
- c. An officer of the National Commission for Women or State Commission for Women; or
- d. Any person who has knowledge of the incident, with the written consent of the Aggrieved Woman.

In case the aggrieved woman is unable to make a Complaint on account of her mental incapacity, a Complaint may be filed by:

- a. Her relative or friend; or
- b. A special educator; or
- c. A qualified psychiatrist or psychologist; or
- d. The guardian or authority under whose care she is receiving treatment or care; or
- e. Any person with knowledge of the incident, jointly with any person mentioned above.



The complaint should be made within a period of three (3) months from the date of incident and in case of more than one incident, within a period of three (3) months from the date of last incident. Complaints arising of incidents more than three (3) months old may not be accepted.

However, the IC may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further 3 months, if it is satisfied that bonafide circumstances prevented the aggrieved individual from filing complaint within the time limit.

Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative may make a complaint.

The Complaints Committee of TEECL consists of the following members:

1. Ms. Avantika Gupta, Director - Chairperson of the committee
2. Mr. Anoar Ali, President – Member
3. Ms Shivani Chandok, Vice President – Member
4. Ms Avirupa Saha, AGM – Member
5. Ms Malika Singh, External Member – Member

For the purpose of conducting an inquiry for a complaint made by a woman, the IC shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 when trying a suit, namely:

1. Summoning and enforcing the attendance of any person and examining them on oath;
2. Requiring the discovery and production of documents; and
3. Making available services of translators, interpreters, special educators, support persons and such other experts as may be required for the purposes of inquiry;
4. Taking evidence on record; and
5. Deciding on the nature and quantum of penalty and such other relief(s) that may be recommended for action.

For the purpose of conducting an inquiry for a sexual harassment complaint made by an individual other than woman, the employer authorises the Internal Committee to conduct the enquiry as per the Code of Conduct of TEECL.

9. Redressal Mechanism:

The Company is committed for providing a supportive environment to resolve concerns of sexual harassment as under:

Conciliation:

Before the IC initiates an inquiry, the complainant may request the IC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If such a conciliation has been so arrived, the IC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the IC.

However, before recommending conciliation, the Committee must assess the severity of the situation and if necessary, advise and enable the enquiry process. At no point, the Complaints Committee will advise the complainant to resolve the matter directly with the respondent.



Respondent and Response:

Within seven days of receiving a complaint, the Complaints Committee will inform the respondent in writing that a complaint has been received.

The respondent will have an opportunity to respond to the complaint in writing within ten days thereafter.

10. Inquiry Process:

On receipt of the complaint, the Internal Committee [IC] will proceed to determine whether the allegations made in the complaint falls within the definition of Sexual Harassment set out in the relevant Act/Rules/Policy.

In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Chairperson of Complaint Committee will record this finding with reasons and communicate the same to the complainant.

If the IC is convinced that the allegations constitute an act of sexual harassment, then the committee will proceed to investigate the allegation made by the complainant.

The IC shall conduct such inquiry in a timely manner and shall submit a written report containing the findings and recommendations to the Employer as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint.

The IC to ensure that the principles of Natural Justice are followed during an enquiry. It follows the below mentioned procedures while carrying out the investigation:

- Interview the complainant and the alleged harasser separately.
- Interview other third party/witness (if named by complainant) separately.
- Identify the substance of each aspect of the complaint.
- Determine whether or not, on a balance of probability, the unwelcome incident(s) of sexual harassment took place.
- Record statements and have them dated and signed.
- Produce a report detailing the investigations, findings and any recommendations • Review and investigate the incident as needed.
- Analyse all the facts to develop reasoning.
- Proceed with If the harassment took place, decide what the appropriate remedy for the victim is, this can be in consultation with the complainant.
- Give recommendation.
- Ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome. Employer to submit a confirmation to IC of recommendation being completed within approved timeline
- Ensure to keep a record of all actions taken.
- Ensure that the all records concerning the matter are kept confidential.



Interim Relief:

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- Transfer the aggrieved individual on his/her own request or the respondent to any other workplace; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restraint the respondent from reporting on the work performance of the complainant.

11. Report:

The complaint Committee will prepare a final report after the investigation and contains the following elements:

- A description of the different aspects of the complaint
- A description of the process followed
- A description of the background information and documents that support or refute each aspect of the complaint.
- An analysis of the information obtained.
- Findings as stated above

Recommendations may include any of the following:

- i) Disciplinary action, including a written apology, reprimand, warning, censure to the perpetrator and a copy of it maintained in the employee's personal file
- ii) Withholding promotion/ pay raise/ increment
- iii) Suspension or Termination
- iv) Counselling

The complaint Committee will prepare a final report after the investigation and contains the following elements:

- A description of the different aspects of the complaint;
- A description of the process followed;
- A description of the background information and documents that support or refute each aspect of the complaint;
- An analysis of the information obtained;
- Findings as stated above
- Recommendations may include any of the following:



- a. Disciplinary action, including a written apology, reprimand, warning, censure to the perpetrator and a copy of it maintained in the employee's personal file;
- b. Withholding promotion/ pay raise/ increment;
- c. Suspension or Termination;
- d. Counselling
- e. Written warning to the Respondent and a copy of it maintained in the employee's file.
- f. Change of work assignment / transfer for either the perpetrator or the victim.
- g. The IC may also recommend financial damages to the complainant, while deciding the amount they shall take into consideration:
 - Mental trauma, pain, suffering and emotional distress caused;
 - Medical expenses incurred;
 - Loss of career opportunity;
 - Income and financial status of the respondent.

12.False Complaint:

In case the complaint is found to be false, or malicious the Complainant shall be liable for appropriate disciplinary action by the Management based on the recommendation of Internal Committee. However, lack of evidence does not necessarily amount to false or malicious complaint.

13.Responsibilities:

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.

Responsibility of Managers:

It is also the responsibility of the Complaint Committee Chairperson and Members to ensure reasonable steps are being made to eliminate sexual harassment:

- Ensure that employees understand what constitutes an act of sexual harassment.
- All employees are regularly made aware of their obligations in relation to providing a workplace free from sexual harassment.
- Provide an environment which discourages harassment and victimization
- Immediate and appropriate corrective and preventive action is taken, if any offensive act is reported.
- Regular guidance and education is provided to employees regarding sexual harassment and inappropriate behavior in the workplace;
- Managers are aware of their obligations and responsibilities in relation to sexual harassment, Ongoing support and guidance is provided to all employees in relation to the prevention of sexual harassment.



14. Timelines:

Submission of Complaint	Within 3 months of last incident
Notice to the Respondent	Within 7 days of receiving copy of the complaint
Completion of inquiry	Within 90 days
Submission of report by ICC to MD	Within 10 days of completion of inquiry
Implementation of Recommendations	Within 60 days
Appeal	Within 90 days of the recommendations

15. Confidentiality:

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment. 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.

All records of inquiry proceedings, including contents of complaint, identity and address of complainant, respondent and witness, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

Records are to be kept/filed in a confidential and secure place by Internal Complaint Committee. Under no circumstances the records be placed on the complainant's personnel file.

16. Protection to Complaint:

The company is committed to 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.

Retaliation against persons who report or provide information as witnesses about sexual harassment or behavior that might constitute sexual harassment is also strictly prohibited. Any act of retaliation, including internal interference, coercion, and restraint by an Employee, violates this Policy and will result in appropriate disciplinary actions as per applicable policy of the Company.

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

APPEAL

Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the Act and Rules.

17. Annual Report:

An annual Report will be prepared on 31st December of every calendar year on Sexual Harassment Findings and the report must include the followings:

- No. of complaint received
- No. of complaint disposed of
- No. cases pending for more than 90 days
- No. of workshops/awareness programs carried out
- Nature of action taken



18. Conclusion:

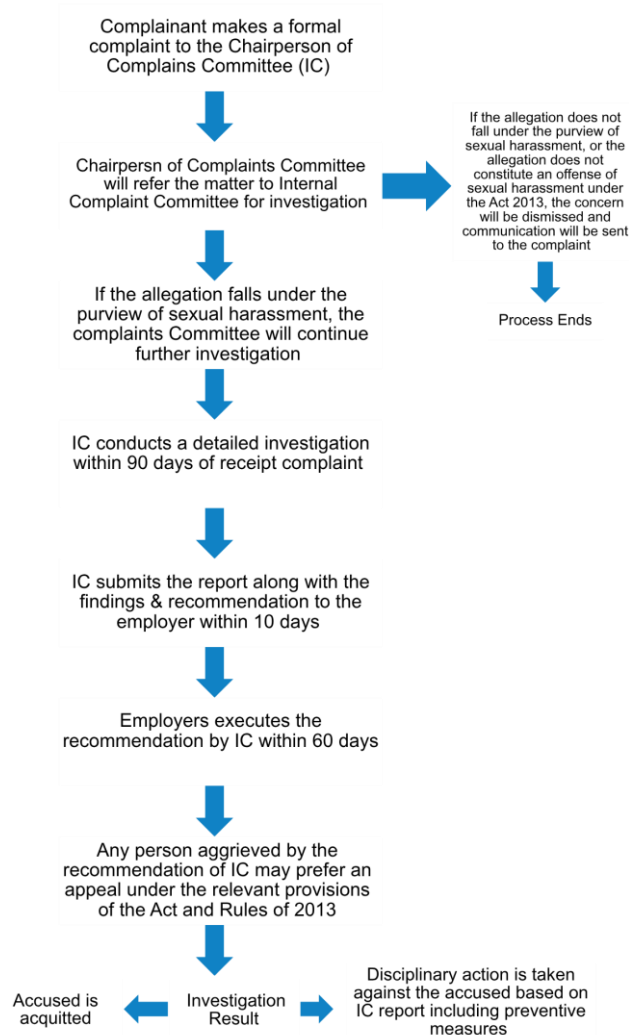
In conclusion, Techno Electric reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with Dignity and Respect.

The Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees.

The identity and address of the aggrieved woman, respondent and witnesses shall not be published or disclosed to the public or media.



The Process Flow:



Ajay Khajuria
(Chief Human Resources Officer)

Policy	Version	Adopted	Revised
Prevention of Sexual Harassment (POSH) Policy	v 2.0	1 September 2023	09 August 2024