

POLICY OF PREVENTION OF SEXUAL HARASSMENT

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INTRODUCTION:

TGV SRAAC LIMITED, is an equal employment opportunity company and is committed to creating a healthy working environment, which enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that, all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place, if involving employees is a grave offence and is therefore punishable under relevant Laws of the Country.

OBJECTIVE:

The Management of TGV SRAAC LIMITED, recognizes that the offence of sexual harassment of employees during the course of employment to be a serious misconduct. It is the duty of the management and all responsible people representing the management to prevent sexual harassment in the workplace and to provide a mechanism for resolution of such complaints. To meet this objective, measures shall be taken to avoid, eliminate, and if necessary, impose punishment for any act of sexual harassment, which includes unwelcome sexually determined behaviour.

APPLICABILITY:

The following are applicable for Redressal of sexual harassment at TGV SRAAC LIMITED:

- It extends to all employees of the Company – permanent, temporary, contract employees and trainees.
- An alleged act(s) of sexual harassment, whether the incident has occurred during or beyond duty hours.
- An alleged act(s) of sexual harassment, whether sexual harassment has taken place within or outside the factory premises.

DEFINITION OF SEXUAL HARASSMENT:

“Sexual Harassment” is, any unwelcome sexually determined behaviour, such as physical contact and advances; a demand or request for sexual favours: whether verbal, textual, graphic, and electronic or by any other actions.

- Harassment may be subtle, manipulative and not always evident.
- It does not refer to occasional compliments of a socially acceptable nature, but to behaviour, that is not welcome and is personally offensive.
- All forms of gender harassment are covered.
- Offenders can be in any grade/level and also covers non – employees such as customers/clients.

Sexual harassment would mean and include any of the following:

- Unwelcome sexual advances,
- Requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity.
- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares,

physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication, which offends the individuals sensibilities and affect her/his performance.

- Eve teasing, innuendos and taunts.
- Physical confinement against one's will and likely to intrude upon one's privacy.
- Physical contact and advances in circumstances, which result in a hostile work environment or discrimination or denial of service progression or benefits.
- Any obscene gesture by an employee having sexual overtones.
- Misuse of official position or powers to solicit sexual favours.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following are basic definition for references:

Complainant: The person reporting an incident of sexual harassment.

Survivor: The person subjected to sexual harassment.

Alleged Harasser: The person who is alleged/reported to have committed an act of sexual harassment.

ESCALATION METHOD: There are 2 Committees i.e. one at the Unit Level referred as **IPC (Internal POSH Committee)** and one at the corporate level **CPC (Corporate Posh Committee)**. The complainant may either approach by submitting a written complaint or via email.

- For confidentiality purpose, the access of the email is given to one of the Corp Committee member who in return, on receipt of an email would direct it to the respective IPC to initiate the enquiry.
- Corp. POSH Committee (CPC) is common for the HO and other corporate offices across India.
- In case, the survivor is not happy with the Unit POSH (IPC) team given resolution, she/he can further make an appeal to Corporate POSH committee (CPC) to re-visit/re-examine the case. However, it is mandatory that, the first enquiry is done at the Unit/Branch Level only.

NOTIFICATION OF HARASSMENT:

Any TGV SRAAC employee who believes, he or she is being harassed, or any employee, who becomes aware of harassment, should submit a hard copy of complaint as per the below format or send an e-mail to **sraachr@tgvmail.net** (mails from personal ID's also will be accepted), which can be accessed by Presiding officer of CPC/IPC.

Corporate POSH Committee (CPC): This email will be accessed by the Corporate HR Team and then, required directions will be given to the Unit HR to take it forward for further process of investigation by IPC. This email is accessed by any member of CPC, when complaint is being registered by the Complainant/Survivor, the following details need to be provided:

1. Name & Address of complainant/survivor
2. Employee ID
3. Contact Number
4. Department
5. Alternate (Emergency) contact name, relationship & phone number.

The Complainant/Survivor must also provide the details of the incident together with name(s) or designation(s) of the self/survivor(s) as available and of the alleged harasser(s) as available.

All such complaints will be treated with confidentiality and will be duly investigated and acted upon, if found to be true.

- ❖ On the broad guidelines mentioned above, each unit can nominate members for the Committee.
- ❖ People with social work or legal background should be preferred as Committee members especially woman as an external member. Certified POSH member or a law qualified person is preferred.

The Procedure for Redressal is as follows:

Upon notification of a harassment complaint, an impartial investigation will be promptly commenced and will include direct investigations with involved parties and where necessary with employees, who may be witnesses or have knowledge of matters relating to the complaint.

- The POSH Committee will provide an opportunity to the survivor as well as the alleged harasser to represent their position and provide their explanations.
- Depending on the nature of explanations given, the Committee would initiate an enquiry on the allegation.
- The alleged harasser would be on suspension during the course of Redressal process.

The redressal process is as follows:

- ❖ The Complainant/Survivor registers his/her complaint through the official E-mail ID mentioned or written complaint.
- ❖ The POSH Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
- ❖ The Committee members shall hear the Complainant and record his/her allegations.
- ❖ The Complainant can also submit any corroborative material with a documentary proof, oral or written material, e-material etc., to substantiate his / her complaint.
- ❖ In any case of embarrassment of narration of event, a same gender Committee member shall meet and record the statement to make the complainant comfortable.
- ❖ The merits of the case will be tested by the Committee by carrying out a detailed investigation into the complaint by following the principles of natural justice.
- ❖ The information on further action of the case should be provided to the complainant within 48 hrs. Under Right to Information Act.
- ❖ Required sessions of enquiry are done and aptly decided by conciliation or by punishment to the complaine.

The final MOM is signed off by the complainant and the complaine.

In case, the complainant is not happy with the same she can deny to sign and request for escalation to the Corp. POSH committee (CPC).

CORPORATE PREVENTION OF SEXUAL HARASSMENT (CPOSH):

In the event an employee is not satisfied with the solution given by the UNIT IPC, the complainant can approach the CPC formed under this policy.

The CPC will conduct a thorough enquiry understanding the fact findings and the case MOM recorded at the Unit Level IPC and conduct further review & enquiry meetings and work towards the best resolution. An impartial solution will be given to the complainant within thirty (30) days of receipt of the harassment complaint by CPC. The decision made by the CPC will be final and binding on both the parties.

PRINCIPLES:

- In case the complaint is found to be false, the complainant shall be liable for appropriate disciplinary action by the IPC in discussion with CPC.
- In the event, if the complaint does not fall under the purview of sexual harassment or the complaint does not mean an offence of sexual harassment, the same would be dropped after recording the reasons thereof.
- However, it is the responsibility of the IPC to educate, why the said complaint does not fall under POSH and how to approach and seek help / support further by connecting him/her to the right committee / people.
- The policy also prohibits retaliation against any employee, who brings an accusation of discrimination of sexual harassment or who assists with the investigation or resolution of sexual harassment.
- Complainants or witnesses will not be in survivorship or discriminated against, while dealing with complaints.
- The aggrieved employee will be allowed to withdraw the complaint any time from the POSH Committee after stating appropriate reasons for the same.
- Should any dispute or doubt arise as to the interpretation of these rules, it should be forwarded to Corporate HR Department and the decision of the management shall be final, Wherein the aggrieved employee is unable to make a complaint on account of physical/mental incapacity or death or otherwise, his/her legal heir or such other person, whom she nominates / requests can register a complaint for the same purpose with the POSH committees.
- Any harassment by a client/customer on an employee or vice versa, would be liable for legal proceedings, as per the Laws of the Country.
- As a part of the policy, the aggrieved employee will be given counselling to help them cope with mental trauma arising out of the harassment.
- The IC shall analyse and put up report on all complaints of this nature and file the required returns.

The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.

POWER TO MAKE RULES AND AMENDMENTS:

The power to make rules pertaining to sexual harassment at workplace vests with the Corporate HR department. Any changes to these rules shall be suitably communicated to all the employees. And the Corporate HR department shall ensure, it is discussed with the committees and is in adherence to the ruling guidelines as per the Country's Law.

1. POSH Committees of IPC / CPC Tenure & Amendments / Approvals :

- i. As per Laws of the country, the members of the Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified.
- ii. However they can be re-nominated as members for the next term.
- iii. In case of any allegation on the member of being biased or any reason of unfit the other committee

members can discuss and take a call. However, the interest and benefit of the employees is above all.

iv. Addition/deletion of new rules and amendments can be proposed by any member of IPC or CPC, and a detailed discussion will be held in presence of chair-person/members of both committees and shall be amended only after approval from Chair-persons of both committees with majority opinion of members.

TGV SRAAC LIMITED - Corporate POSH Committee (CPC)

Complaints from regional offices of Hyderabad, Bangalore & Chennai will be directly handled by CPC (Corporate Posh Committee).

S. NO.	NAME	DESIGNATION	ACTIVE ROLE	PHONE NO.	E-MAIL
1	K. Karunakar Rao	C.E.O/ E.D(F&C)	Chairman	9848076501	karunakar@tgvmail.net
2	G. Prahlad Setty	G.M (HR)	Presiding Officer	6303801235	sraachr@tgvmail.net
3	M. Sri Devi	Independent Director	External Woman Member	9885040075	srinadati@gmail.com
4	C. Srinivasa Babu	E.D (Tech.)	Member	6303801608	srinivasbabu@tgvmail.net
5	C. Rajesh Khanna	C.F.O	Member	6303801147	csdgmf@tgvmail.net
6	K. Kumaraswamy	V.P (Audit)	Member	6303801229	sodime@tgvmail.net
7	V. Radhakrishna Murthy	Company Secretary	Member	9848961239	sraaccs@tgvmail.net

TGV SRAAC LIMITED – UNIT Internal POSH Committee (IPC) - Only for Plant site

S. NO.	NAME	DESIGNATION	ACTIVE ROLE	PHONE NO.	E-MAIL
1	C. Srinivasa Babu	E.D (Tech.)	Chairman	6303801608	srinivasbabu@tgvmail.net
2	S. E. Rahman	Manager (HR)	Presiding Officer	6303801199	hrdept@tgvmail.net
3	S. Hima Bindu	Independent Director	External Woman Member	9290285566	himabindusagala@gmail.com
4	E. Ramaiah	Sr.V.P (Mech.)	Member	9848013370	ellururamaiah@tgvmail.net
5	P.Raghavendra Reddy	V.P (QA)	Member	9848079064	sraaclab@tgvmail.net
6	KVNR Ramakrishna	V.P (Elect. & Inst.)	Member	9009088846	kvnrramakrishna@tgvmail.net
7	G.V.R.S.Sastry	C.G.M (Mech.) / MR	Member	6303801195	gvrs.sastry@tgvmail.net

This Policy is made available to all employees for implementation in our organisation w.e.f dt. 01.04.2025.

(C.SRINIVASA BABU)
Executive Director/Occupier