AZAD ENGINEERING LIMITED

[CIN: U74210TG1983PLC004132]

Regd. Office: 90/C,90/D, Phase 1 I.D.A, Jeedimetla Hyderabad-500055 Telangana, India.

POSH POLICY

(Committed to Safety of Women at Workplace)

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY AT WORKPLACE OF AZAD ENGINEERING LIMITED

I. INTRODUCTION

Azad Engineering Limited **("Company")** quest for competitive excellence consists of our commitment to lawful and ethical conduct and adhering to our company's values. Integrity, honesty and respect for people remain some of our core values.

The Company is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. It is also committed to promoting a work environment that is conducive to the professional growth of its employees/ trainees and encourages equality of opportunity. It will 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.

Keeping in view of the above this Prevention of Sexual Harassment (POSH) Policy has been framed to prohibit, prevent and deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to such sexual harassment in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and has been approved by the Board of Directors of the Company.

II. APPLICABILITY

This Policy applies to all the employees, trainees and Contract Workers (whether in the office premises or outside while on duty) of the Company in India. Where sexual harassment occurs to an employee as a result of an act by a third party or outsider while on official duty, the Company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

III. WHAT IS SEXUAL HARASSMENT?

Sexual Harassment includes such unwelcome sexually determined behavior, as physical contacts and advances, sexually colored remarks, showing pornography and sexual demands whether by words, gestures or actions. Such conduct can be humiliating and may constitute a health and safety problem. It is discriminatory when the complainant has reasonable grounds to believe that his other objection would disadvantage them in connection with employment, including recruiting or promotion or when it creates a hostile working environment.

Sexual harassment includes such unwelcome sexually determined behavior (whether directly or by implication) as:

(a) Physical contact and advances;

(b) A demand or request for sexual favors;

(c) Sexually colored remarks;

(d) Showing pornography;

(e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories - quid pro quo and creation of a hostile working environment.

(a) Under the quid pro quo (meaning this for that) form of harassment, a person or authority, usually the superior of the aggrieved women, demands sexual favors for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

(b) A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on personal dignity. For example, an employee tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment

(a) Implied or explicit promise of preferential treatment in her employment or
(b) Implied or explicit threat of detrimental treatment in her employment; or
(c) Implied or explicit threat about her present or future employment status: or
(d) Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
(e) Humiliating treatment likely to affect her health or safety

However, an employee who is sexually harassed can complain about the same even if there is no adverse job consequence.

IV. 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.

Note: *Wherever the word "employee" is used shall also include any Trainee and Contract Worker.*

V. COMPLAINT MECHANISM

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

VI. INTERNAL COMPLAINTS COMMITTEE (ICC)

To prevent instances of sexual harassment and to consider and appropriately deal with complaints pertaining to the same, an Internal Complaints Committee(s) **(ICC)** will be constituted at various Workplaces of the Company specifically provided for in **Annexure-1**. The "Internal Complaints Committee" shall consist of a

Chairperson, and three (3) other members. A woman employed at the senior level shall be the Chairperson. Not less than two members (one of whom shall be a woman) should, preferably be committed to the cause of women or have had experience in social work or who have legal knowledge. One of the ICC members shall be from a NGO or association committed to the cause of women or in other social work or a person familiar with the issues of sexual harassment at workplace. The tenure of the members of the ICC shall not exceed three (3) years & names of the ICC members shall be displayed by the HR Manager at a prominent place. The Directors shall be the authority for initiating disciplinary actions on issues relating to sexual harassment at the workplace. The composition of the Company's ICC is as per **Annexure-2** attached herein.

VII. DEALING WITH THE COMPLAINT

Given that this policy highlights a preventive focus, there is a need to distinguish between an informal and formal process.

VIII. INFORMAL COMPLAINT REDRESSAL MECHANISM

Informal processes normally involve an intermediary means for resolving a problem. In the case of Sexual Harassment, at first instance, the person (i.e. HOD/ HR/ Woman representative of the location) may be the point of first contact for anyone seeking informal support/ intervention to stop unwelcome behavior.

A sense of restraint and responsibility on the part of all concerned is critical for the effective functioning of these guidelines. The preventive / informal process that can be adopted is as follows:

1. Convey to the person who is the cause of distress, about what that person's actions, words, behavior is doing and convey in no uncertain terms that such behavior is not appreciated. What is important is the "Way" a particular behavior, action or word is perceived; "Intent" is of no consequence.

2. The second step would be to approach someone within the Company – preferably your Superior or HR Representative. The Superior or HR Representative would then try and counsel / talk it over with a view towards closing the matter amicably.

3. In any case all such incidents along with the resolution, needs to be reported to the Head of HR who will then provide a short report to the ICC and the matter will be closed.

4. However, in the event of it not being resolved, then it would need to be escalated to the ICC.

IX. FORMAL COMPLAINT REDRESSAL MECHANISM

1. Any aggrieved women shall prepare in writing a detailed statement of incident/ allegations of sexual harassment within a period of three (3) months from the date of such incident and in case of a series of incidents, within a period of three (3) months from the date of last such incident, which may be extended for a further period of three (3) months, if circumstances warrant such extension in the opinion of the ICC along with the name and designation of accused and names and address of witness if any. Such a complaint shall be sent to the hr@azad.in. Where the aggrieved woman is unable to make a complaint on account of her physical/ mental incapacity or death or otherwise, a complaint may be filed by her legal heir.

2. On receipt of such Complaint, ICC shall provide a copy thereof along with supporting documents to the accused within seven (7) working days.

3. The accused shall be asked to prepare a written response to the statement of allegations and submit to the ICC within ten (10) working days of receipt of copy of complaint from ICC.

4. The ICC then shall organize verbal hearings with the complainant, accused and witness (es), if any, as when necessary with advance notice of at least one (1) day and for conducting the enquiry, the quorum of the ICC shall be three (3) members including preceding officer.

5. The ICC shall take testimonies of other relevant persons and review the evidence wherever necessary. The ICC shall ensure that sufficient care is taken to avoid any retaliation against the witnesses.

6. ICC shall have the right to terminate the enquiry or give ex-parte decision on the complaint, if the accused or complainant remains absent for three (3) consecutive hearings, without sufficient cause.

7. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the ICC.

8. For conducting the enquiry, the quorum of the ICC shall be a minimum of three (3) members including the presiding officer.

9. The ICC shall follow the principle of Natural Justice while handling such complaints and may during such investigation exercise the power of a civil court, vested in it, in respect of:

a) summoning and enforcing the attendance of any person and examining him under oath
b) requiring discovery and production of documents
c) any other prescribed matter

10. During such enquiry, the ICC may on a written request received from the Complainant recommend to employer to:

a) transfer the aggrieved women or the accused to any other work place
b) grant leave to aggrieved women up to a period of three (3) months
c) grant such other relief as deem fit

The leave granted to the aggrieved women shall be in addition to the leave she would be otherwise entitled.

11. During the time of enquiry if the ICC is of the view that the situation is such that it needs advice of expert or the ICC is not in a position to arrive at a conclusion, then it may refer the matter to an expert(s) keeping in view the confidentially and severity of the situation, for such person's expert opinion/ report or recommendation and based on which the ICC may submit its findings/ enquiry report.

12. The ICC must complete its investigation within a period of ninety (90) days.

X. DISCIPLINARY ACTION

1. The ICC shall on completion of the enquiry provide a report of its findings within ten (10) days from the date of completion of the enquiry and such report shall be made available to employer and concerned parties.

2. lf the allegation against the accused has not been proved, that no action needs to be taken in the matter.

3. lf the ICC arrives at the conclusion that the allegation against the accused has been proved, it shall recommend the employer to:

a) take action for sexual harassment as misconduct in accordance with the provisions of the service rules applicable.

b) direct the accused to tender a written apology to the complainant.

c) issue warning, withholding of promotions / increments of the Accused, terminating the Accused.

d) deduct from salary / wages of the accused or issue direction for payment; such sum as it may be considered appropriate, to be paid to the complainant or to their legal heirs, as it may determine.

4. Such action will be taken within sixty (60) days of the receipt of the report.

5. However, any person aggrieved from the recommendations made by the Internal Complaints Committee or non-implementation of such recommendations, may prefer an appeal to the Appellate Authority constituted under Section 7 of the Industrial Disputes Act, 1947 or to the court or tribunal in accordance with the provisions of the Act within a period of Ninety (90) days of the recommendations.

XI. CONCILIATION

The ICC may before initiating an inquiry and at the complainant's request, attempt to settle the matter through conciliation. However, ICC shall ensure that:

1. Monetary settlement will not be made as a basis of conciliation.
2. Where a settlement has been arrived at, the settlement terms shall be signed by both the parties and shall be provided with a copy of it. Where, a settlement is arrived as mentioned hereinabove, no further enquiry shall be conducted by the ICC.

XII. DUTIES OF EMPLOYER

Employer is entrusted with following duties for implementation and maintenance of this policy:

1. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.
2. Provide assistance to the aggrieved woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
3. Monitor the timely submission of report by the ICC.

XIII. AWARENESS

1. All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this policy shall be addressed by the HR team of the Company.

2. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees in the Company during their initial Induction.

3. Company shall display a notice showing the name of the ICC members, the penal consequences of sexual harassments, and the order constituting the ICC at its every establishment at a conspicuous place and also provide E-mail ID of the ICC for lodging a formal Complaint.

4. Company shall organize workshops and awareness Programmes at regular intervals for sensitizing the employees with the provisions of the Act and orientation Programmes for the members of the ICC.

XIV. FALSE ACCUSATIONS

1. The Complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by Company. However, there shall be zero tolerance for any false accusation.

2. lf the ICC comes to a conclusion that the allegation was made with malicious intent or the complainant or any other person making the complaint on behalf of the complainant produced false or forged or misleading documents to prove his/her case, the ICC may recommend action to be taken against the person who has made the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the ICC concludes that he/she has given false evidence or produced forged or misleading documents.

XV. CONFIDENTIALITY

All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

XVI. PROTECTION TO COMPLAINANT/ AGGRIEVED WOMEN/ WITNESS

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. The Company will ensure that the complainant, aggrieved women 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.

XVII. POLICY IMPLEMENTATION AND REVIEW

1. The policy will be implemented and reviewed by the HR Department. The company reserves the right to amend, abrogate, modify, rescind/reinstate the entire policy or any part of it at any time.

2. The ICC shall prepare an Annual Report with the following details and shall submit the same to the Company to include in its Annual Report:

a) Number of complaints of sexual harassment received during the year
b) Number of complaints disposed off during the year
c) Number of cases pending for more than ninety (90) days
d) Number of workshops or awareness program against sexual harassment carried out
e) Nature of action taken by the employer

3. The ICC will monitor results in achieving the policy objective and statement.

XVIII. CONCLUSION

In conclusion, the Company reiterates its commitment to providing its employees a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Note:

1. **This Policy has been approved by the Board of Directors at its meeting held on June 09, 2023 and shall come into force w.e.f. from June 09, 2023.**
2. **The various ICCs were reconstituted with immediate effect in line with approval of the Board of Directors at its meeting held on February 13, 2026**

Annexure -1

WORKPLACES OF THE COMPANY

S.no	Location	Committee Cluster
1.	**UNIT 2:** PLOT NO. 17/B, Pashamylaram, Isnapur Sangareddy, Telangana - 502307	ICC-1
2.	**UNIT 3:** PLOT NO 90/C, 90/D, 90/E, Jeedimetla IDA, Hyderabad Medchal Malkajgiri, Telangana - 500055	ICC-2
3.	**UNIT 4:** Plot No D42/43, Phase V, TSIIC IDA, Jeedimetla Industrial Park, Quthbullapur Mandal, Hyderabad Medchal-Malkajgiri, Telangana - 500055	
4.	**UNIT 5:** Plot No 63/A , Phase I, TSIIC IDA, Survey No 298, Jeedimetla Village, Industrial Park, Quthbullapur Mandal, Hyderabad, Medchal-Malkajgiri, Telangana - 500055	
5.	**UNIT 6:** Plot No 30 & 31, Phase 5 IDA, Jeedimetla, Hyderabad Medchal Malkajgiri, Telangana - 500055	
6.	**UNIT 7:** SY 340 Plot No 85 to 92 & 118 to 123, Tuniki Bollaram, Industrial Park, Tuniki Bollaram Siddipet, Telangana - 502279	ICC-3

Note:

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Annexure - 2

CONSTITUTION OF INTERNAL COMPLAINT COMMITTEE CLUSTERS

1. ICC-1

Name	Company	Designation
Ms. Bellamkonda Silpa Kanaka	Azad Engineering Limited	Presiding Officer
Ms. Vidushree Jain	Azad Engineering Limited	Member
Mrs. Saritha Jain	Independent POSH Practitioner	External Member
Mr. Vidhya Sagar	Azad Engineering Limited	Member

2. ICC-2

Name	Company	Designation
Ms. Bellamkonda Silpa Kanaka	Azad Engineering Limited	Presiding Officer
Ms. Boda Aruna Kumari	Azad Engineering Limited	Member
Ms. Vidushree Jain	Azad Engineering Limited	Member
Mrs. Saritha Jain	Independent POSH Practitioner	External Member
Mr. Vidhya Sagar	Azad Engineering Limited	Member

3. ICC-3

Name	Company	Designation
Ms. Bellamkonda Silpa Kanaka	Azad Engineering Limited	Presiding Officer
Ms. Boda Aruna Kumari	Azad Engineering Limited	Member
Ms. Vidushree Jain	Azad Engineering Limited	Member
Mrs. Saritha Jain	Independent POSH Practitioner	External Member

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