



POLICY FOR PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

OF

PARAS DEFENCE AND SPACE TECHNOLOGIES LIMITED

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PREVENTION OF SEXUAL HARASSMENT (POSH) AT WORKPLACE

1. **Purpose:**

The primary objective of this policy is to create a work environment where every employee feels valued, respected, and safe from any form of sexual harassment. It serves to clearly communicate the organization's firm stance against sexual harassment and specifies the comprehensive measures in place to prevent, report, and address such behavior. By fostering a culture of mutual respect, the policy strives to uphold the dignity and well-being of all employees and associates, ensuring a positive and professional working environment for everyone.

2. **Scope and Applicability:**

- 2.1 This Policy is for the protection of all employees and associates. This Policy extends to all Employees and associates of the Company whether permanent, temporary, on training and on contract
- 2.2 The Company will also not tolerate Sexual Harassment of the Employee of the Company, if engaged in by clients or any other business associates.
- 2.3 This Policy shall extend to all Company-related activities performed at any other site away from the Company's premises, all Employees at (whether in the office premises or outside) while on assignment, all Company's offices, factories (Plants), godowns situated in, India; or other premises where the Company's business is conducted and incidents of Sexual Harassment reported by Company's Employee as a result of an act by a third party or outsider while on official duty.
- 2.4 The Company will take all necessary and reasonable steps to assist the affected person in terms of support and preventive action.

3. **Sexual Harassment conduct includes, but is not limited to the following-**

- 3.1 While it is not possible to list all of the circumstances which would constitute sexual harassment, following are some examples:
 - Unwelcome sexual advances, whether they involve physical touching or not;
 - Requests for sexual favors in exchange for actual or promised job benefits such as favorable reviews.
 - Salary increases, promotions, increased benefits, or continued employment; or coerced sexual act.

3.2 Depending on the circumstances, the following conduct may also constitute sexual harassment:

- Use of sexual jibes, jokes, written or oral references to sexual conduct, gossip regarding one's sex life.
- Sexually oriented comment on an individual's body, comment about an individual's sexual activity, deficiencies or prowess.
- Displaying sexually suggestive objects, pictures, cartoons.
- Unwelcome leering, whistling, deliberate brushing against the body in a suggestive manner; sexual gestures or sexually suggestive comments.
- Inquiries into one's sexual experiences; or discussion of one's sexual activities.

4. Internal Committee

4.1 The Internal Committee ("IC") shall have the following composition:

- a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees:
- Not less than two members from amongst members shall be committed to the cause of women or who have had experience in social work, or have legal knowledge;
- One member from a non-government organization or association committed to the cause of women, or person familiar with the issues of sexual harassment.
- Provided that at least fifty per cent of the members so nominated shall be women.
- Term of Committee members shall be 3 years, after which Committee Constitution shall be reviewed.

4.2 The Committee shall have the power to:

- Summon and enforce attendance of any person and examine him / her;
- Require the discovery and production of documents; and
- Any other power as prescribed.

5. Procedure to lodge a Complaint:

5.1 Any person who feels that she/ he is being sexually harassed, directly or indirectly, may submit a Complaint of the alleged incident to any member of the IC in writing with their signature within three (3) months of occurrence of incident, and in case of a series of incidents, within a period of three (3) months from the date of the last incident. The IC may, after recording its reasons in writing, extend the time limit if it is satisfied with the circumstances that led to preventing the Complainant from making the Complaint within three (3) months; The person who files such complaint shall be called the 'Complainant' and the person against whom such complaint is filed shall be called the 'Respondent' for the purposes of this policy.

- 5.2 In case of any difficulty in filing the Complaint in writing, the Presiding Officer/Member of the IC shall provide reasonable assistance to the Complainant to file a written Complaint;
- 5.3 The Internal Committee shall maintain a register to record the Complaint received by it and keep the contents confidential, except to use the same for inquiry;
- 5.4 The Complainant must file the Complaint along with supporting documents and names and addresses of witnesses, if any;
- 5.5 The IC shall forward one copy of the Complaint to the Respondent within seven (7) working days;
- 5.6 The Respondent must file his response to the Complaint along with supporting documents and names and addresses of witnesses, if any, within ten (10) days of receiving the Complaint copy from the IC. A copy of the said response shall be provided to the Complainant forthwith.

6. External Complaint Mechanism – SHe-Box

In addition to the Internal Committee (IC) constituted under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, an aggrieved woman employee, intern, consultant, contractual worker, visitor, or any woman associated with the workplace may also lodge a complaint through the SHe-Box portal administered by Ministry of Women and Child Development, Government of India at <https://shebox.wcd.gov.in/>

Employees are encouraged to first approach the Company's Internal Committee wherever appropriate. However, use of SHe-Box does not restrict any statutory rights available under applicable law.

7. Inquiry:

- 7.1 The IC will initiate an inquiry within 30 days of receiving the written complaint and make an inquiry into the Complaint in accordance with the principles of natural justice;
- 7.2 During the pendency of an inquiry, the IC shall, on the request made by the Complainant, grant interim relief, like transfer the victim/respondent to another location/work place, Grant leave to the victim up to a period of three months (In addition to the leave otherwise entitled), Grant any other relief as found suitable by IC.
- 7.3 Where both the Complainant and the Respondent are Employees of the Company, the

IC will give each of them an opportunity of being heard at the time of inquiry, and will make available to each, a copy of its findings enabling them to make representation in respect of such findings, before the IC; The IC may terminate the inquiry proceedings or decide ex-parte on the Complaint, if the Complainant or the Respondent does not, without sufficient cause, present himself/herself for three consecutive hearings convened by the IC;

7.4 The quorum for convening a meeting of the IC for the purpose of an inquiry shall be three (3) members of the IC, including the presiding officer; at least two of these three members will be women.

7.5 The IC shall complete the inquiry within a period of ninety (90) days and communicate its findings and its recommendations for action to the Company's management in a report, within ten (10) days of completing the inquiry;

7.6 A copy of the report shall also be made available to the Complainant and the Respondent;

7.7 The report of the IC shall be treated as a final report on the basis of which the Respondent can be awarded appropriate punishment straightaway within sixty (60) days of its receipt. In the event the IC concludes that allegations of Sexual Harassment have been established, it shall in its report to the Company, recommend that action against the Respondent be taken in accordance with the Company's service rules. The Company's Management will direct appropriate action in accordance with the recommendation proposed by the IC;

7.8 In the event, the Complaint does not fall under the purview of Sexual Harassment or the allegations are not established, the IC shall recommend to the Company that no action is required to be taken and close the enquiry by recording reasons in writing;

7.9 The IC shall be governed by the Act and the Rules.

8. Appeal

Any person aggrieved by the recommendations or non-implementation of the recommendations made by the IC, may prefer an appeal, in accordance with the law within ninety (90) days of the recommendations.

9. False Complaint/Evidence

IC shall take action in accordance with the provision of the Act against a Complainant for knowingly or recklessly bringing a false Complaint of Sexual Harassment and false



evidence;. If on an inquiry, the Complaint is found to be false or malicious, or that a witness has given misleading evidence, the Complainant or the witness, as the case may be, shall be liable for appropriate disciplinary action by the IC. However, such malicious intent must be established after an inquiry and a mere inability or insufficiency to substantiate a Complaint shall not be considered as grounds for taking action.

10. Confidentiality and Non-Retaliation:

All matters related to complaints of sexual harassment will be treated with the highest level of confidentiality to protect the privacy of all parties involved. Retaliation against any individual who files a complaint or participates in an investigation will not be tolerated and will lead to disciplinary action.

11. Supremacy of the Act:

It is specifically provided that the provisions contained in the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("Act") shall prevail wherever there is any conflict with this policy.
