POOJAA PRECISION ENGG. LIMITED
(Formerly known as Pooja Castings Pvt. Ltd.)
CIN: U27310MH1992PLC068151

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

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BACKGROUND

In accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, **POOJAA PRECISION ENGG. LIMITED (Formerly known as Pooja Castings Pvt. Ltd.)** *("the company")* is committed to provide and promote work environment that is conducive to the professional growth of its employees and encourages equality of opportunity with dignity and respect. We will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that our women employees are not subjected to any form of harassment.

DEFINITION

a. **"Employee"** Employee means 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, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied, and includes a co-worker, contract worker, probationer, trainee, intern or called by any other such name. It also includes any visitor who visits Company premises; or any person who is a temporary resident of any of the accommodations or premises allotted by Company.
b. **"Employer"** means any person responsible for the management, supervision, and control of the workplace
c. **"Management"** includes a person, or board of directors, or a committee, responsible for formulation and administration of policies of the Organization.
d. "**Internal Complaints Committee (ICC)"** means an Internal Complaint Committee constituted under Section 4.
e. **"Sexual Harassment"** maybe one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

SCOPE

Sexual Harassment at the workplace includes:

a. Unwelcome sexual advances (verbal, written or physical);
b. Demand or request for sexual favours;
c. Showing and/or sharing pornography or other offensive or derogatory pictures, cartoons, pamphlets or sayings,
d. Verbal abuse or 'joking' that is sex-oriented, any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive workenvironment and/or submission to such conduct is either an explicit or implicit term or condition of employment and/or submission or rejection of the conduct is used as a basis for making employmentdecisions;
e. Eve-teasing, gender-based insults or sexist remarks;
f. Unwelcome sexual overtone in any manner such as over telephone (obnoxious telephone calls), text message, e-mails or on social media;
g. Intentionally touching or brushing against the body, forcible physical touch or molestation;
h. Physical to confinement against one's will and any other act likely to violate one's privacy; or
i. Any action (either individually or coupled with any of the above) which may include, but not limited to may also amount to sexual harassment:
    i. Implied or explicit promise of preferential treatment in employment; or
    ii. Implied or explicit threat of detrimental treatment in employment; or

iii. Implied or explicit threat about the present or future employment status; or
iv. Conduct which interferes with work or creates an intimidating or offensive or hostile work environment; or
v. Humiliating conduct likely to affect health or safety.

RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

All employees 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.

COMPLAINT MECHANISM

An appropriate complaint mechanism in the form of ICC has been created in the Company for time-bound redressal of the complaint made by the victim.

FORMATION OF INTERNAL COMPLAINT COMMITTEE

a. A Presiding Officer who shall be an employee employed at a senior level at workplace from amongst the employees.

b. Not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;

c. One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The Presiding Officer and every Member of the ICC shall hold office for 3 years.

For conducting the inquiry, a minimum of three Members of the ICC including the Presiding Officer or the Chairperson should be present.

PROCEDURES FOR RESOLUTION, SETTLEMENT OR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

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

a. **Informal Resolution Options**

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently. If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the ICC for redressal of their grievances. ICC will provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

b. **Complaints**

i. An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Chairperson or any member of the ICC constituted by the Management. The complaint should be made by an aggrieved employee within a period of three months from the date of occurrence of incident and in case of a series of incidents, within a period of three months from the date of last incident. Alternately, the employee can send complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Committee to contact them and take the matter forward.

ii. Where the aggrieved employee is unable to make a complaint on account of physical or mental incapacity or death or otherwise, legal heir or such other person as may be prescribed may make a complaint.

iii. ICC shall commence an inquiry within 7 working days from the date of receipt of the complaint and will meet the complainant within 3 (three) working days from commencement of inquiry.

iv. Chairperson of the ICC will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within 30 days from receipt of the complaint.

v. 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, ICC will record this finding with reasons and communicate the same to the complainant.

vi. If the ICC determines that the allegations constitute an act of sexual harassment, they will proceed to investigate.

vii. Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

viii. The ICC shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations, if any, to the Managing Director/ Executive Director as soon as practically possible and in any case, not later than 90 days from the date of receipt of the complaint. Managing Director / Executive Director will ensure corrective action/ disciplinary action on the recommendations of the ICC and keep the complainant informed of the same.

CORRECTIVE ACTION/ DISCIPLINARY ACTION

The corrective action/ disciplinary action may include any of the following:

a. Formal apology
b. Counseling
c. Written warning to the perpetrator and a copy of it maintained in the employee's file.
d. Change of work assignment/ transfer for either the perpetrator or the victim.
e. Withholding or stoppage of Increment/ Promotions.
f. Negative impact on performance appraisal.
g. Fine
h. Compensation to the victim through deduction from the salary of the person found guilty.
i. Termination of services of the employee found guilty of the offence without notice or any compensation in lieu of notice.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

a. **Conciliation**

i. The ICC may, at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation: Provided that no monetary settlement shall be made as a basis of conciliation.

ii. Where a settlement has been arrived at as in (a) above, the ICC, shall record the settlement so arrived and

forward the same to the employer to take action as specified in the recommendation.

iii. The ICC shall provide the copies of the settlement as recorded as in (b) above to the aggrieved woman and the respondent.

iv. Where a settlement is arrived at (a) above, no further inquiry shall be conducted by the ICC.

b. **Compensation**

Where the ICC, arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer to deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heir.

For the purpose of determining the sums to be paid to the aggrieved woman, the ICC, shall have regard to:

i. The mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman.

ii. The loss in the career opportunity due to the incident of sexual harassment.

iii. Medical expenses incurred by the victim for physical or psychiatric treatment.

iv. The income and financial status of the respondent.

v. Feasibility of such payment in lump sum or in installments.

In case the employer is unable to make such deduction from the salary of the respondent due to his being absent from duty or cessation of employment it may direct to the respondent to pay such sum to the aggrieved woman:

Further, in case the respondent fails to pay the sum referred to above, the ICC may forward the order for recovery of the sum as an arrear of land revenue to the concerned District Officer.

The employer or the District Officer shall act upon the recommendation within sixty days of its receipt by him.

c. **Appeal**

Any person aggrieved from the recommendations made by the ICC, may prefer an appeal to the court or tribunal in accordance with the provisions of the service rules applicable to the said person. The appeal shall be preferred within a period of ninety days of the recommendations.

CONFIDENTIALITY

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.

ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential except where disclosure is required under relevant law.

PROTECTION TO COMPLAINANT/ VICTIM/ WITNESSES

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 victim 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.

PENALTY AND PUNISHMENT

a. **Punishment for false or malicious complaint and false evidence:**

i. Where the ICC, arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer, to take action against the woman or the person who has made the complaint in accordance with the provisions of the service rules applicable to her or him.

ii. Where the ICC, arrives at a conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, it may recommend to the employer of the witness, to take action in accordance with the provisions of the service rules applicable to the said witness.

b. **Penalty for publication or making known contents of complaint and inquiry proceedings:**

i. The contents of the complaint, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC, and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner, provided that information may be disseminated regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the aggrieved woman and witnesses.

ii. Where any person entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations or action to be taken in that regard, contravenes the provisions of B(i) above, he/she shall be liable for penalty in accordance with the provisions of the service rules applicable to the said person.

c. **Penalty for non-compliance with provisions of Act, where the employer fails to:**

i. Constitute an ICC;

ii. Take action pertaining to enquiry, punishment for false or malicious complaint and false evidence or inclusion of information in annual report (or where no such report is required to be prepared, intimate such number of cases, if any, to the District Officer).

iii. Contravenes or attempts to contravene or abets contravention of other provisions of the Act or any rules made thereunder, he shall be punishable with fine or other punishment as per the provisions of the Act/ Rules.

DUTIES OF EMPLOYER

Employer shall:

i. Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.

ii. Display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the ICC.

iii. 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.

iv. Conduct capacity building and skill building programmes for the Members of ICC.

v. Declare the names and contact details of all the Members of the ICC.

vi. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.

vii. Assist in securing the attendance of respondent and witnesses before the ICC.

viii. Make available such information to the ICC as it may require having regard to the complaint.

ix. Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force.

x. Cause to initiate action, under the Indian Penal Code (45 of 1860) or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place.

xi. Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.

xii. Monitor the timely submission of reports by the ICC.

AMENDMENT

Any change in the Policy shall be approved by the Board of the Company. The Board shall have the right to withdraw and/ or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

In case any provisions of the Policy are contrary to or inconsistent with the provisions of the Companies Act, 2013, rules framed thereunder and Listing Regulations ("Statutory Provisions"), the provisions of Statutory Provisions shall prevail.

DISSEMINATION OF THE POLICY

The policy shall be hosted on the website of the Company i.e. www.poojacastings.in

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Effective Date: 17/12/2025
Date of Approval by Board of Directors: 17/12/2025