Policy on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace (POSH)

Approved by the Board on 11 of December, 2023

Introduction

At **AVP Infracon Limited** (the Company), has zero-tolerance for Sexual Harassment (as defined below). We are determined to promote a working environment in which persons of both sexes work and complement each other as equals in an environment that encourages maximum productivity.

Behavior that has been defined as inappropriate by the Company's Policy on Prevention, Prohibition & Redressal of Sexual Harassment at the Workplace ('the Policy') (whether physical verbal, written, graphic emotional or through gestures that offend) intentionally or not, and offends the dignity and morality of a person to which the behavior is directed by fellow Employees, supervisors, customers and, suppliers will be considered Sexual Harassment and invite serious disciplinary action or other action as necessary, as described in more detail below.

The Policy covers every Employee across the Group, as defined in more detail below. The Company encourages every Employee who has been sexually harassed to use the Redress System that has been laid down. The Company has adopted a gender-neutral policy.

The Company is committed to giving every Employee a just and fair hearing on issues that are raised on Sexual Harassment. The Company will take very serious disciplinary action against any victimization of the Complainant or the Respondent that may result from a Complaint.

Definitions:

- Sexual Harassment may include any of the following but not limited to:
- Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit.
- Physical contact and advances.
- Demand or request for sexual favors.
- Sexually colored remarks, including but not limited to vulgar / indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.
- Showing pornography or the likes.
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation.
- Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas.
- Verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature.
- Teasing, innuendos and taunts, physical confinement and /or touching against ones will and likely to intrude upon one's privacy.

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

- Implied or explicit promise of preferential treatment in the employment.
- Implied or explicit threat or detrimental treatment in the employment.
- Implied or explicit threat about the present or future employment status.
- Interference with the work or creating an intimidating or offensive or hostile work environment.
- Humiliating treatment likely to affect health or safety.

The point of consideration should be the effect that the conduct of one person has on another rather than whether the behavior was intentionally offensive or not. Further, not only face to face harassment, but Sexual Harassment by electronic means, such as by the use of social media, as well shall constitute Sexual Harassment.

Sexual Harassment does not have to be repeated or continuous to be against the Policy.

The following behavior is indicative of the behaviors that is considered inappropriate within the Company's working environment and is liable for disciplinary action:

Verbal harassment

1. A demand or request for sexual favors.
2. Comments about a person's sex or private life.
3. Sexually colored remarks.

Physical harassment

1. Offensive gestures.
2. Touching in a sexual manner.
3. Assault or coerced sexual acts.

Written or graphic harassment

1. Unsolicited forwarding of pornographic pictures through email, or any other medium.
2. The display of sexually suggestive objects, pictures, magazines, posters or cartoons in the work-area.
3. Written communication that has sexual implications.

Emotional harassment

1. Demanding sexual favors in return for or with a promise of favorable performance appraisals, promotions, sustained employment and provision of employment.
2. Implied or explicit detrimental treatment for refusal to provide sexual favors.
3. Interference with the work or creating an intimidating or offensive or hostile work environment.
4. Humiliating treatment likely to affect health or safety.

Third Party Harassment

As per the Act, if Third Party Harassment occurs as a result of an act or omission by any third party or outsider, the Company and person in-charge will take necessary and reasonable steps, as per law, to assist the affected person in terms of support and preventive action including assisting an employee / guest who wishes to file a complaint with the local police.

This case is particularly relevant in our industry where our Employees are constantly in touch with third parties through their interaction with guests and clients. Our Employees have to be assured that the Company will support them in preventing or prosecuting any such case of misconduct.

Aggrieved Individual

An Aggrieved Individual, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.

Complainant

A Complainant is any Aggrieved Individual (or if the Aggrieved Individual is unable to make a Complaint on account of his/her physical or mental incapacity or death or otherwise, any other person permitted under the Rules) who makes a Complaint alleging Sexual Harassment under this Policy.

Employee

Employee means a person employed by the Company, 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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

Respondent

A Respondent means the person against whom the Complainant has made a Complaint.

Workplace

- Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, controlled by the Company.
- The Company related activities performed at any other site away from its premises.
- Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- Places visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.
- Any misbehavior in the nature of Sexual Harassment on any social networking website shall also be considered Sexual Harassment at workplace irrespective of whether such sexual behavior was shown during or outside of office hours.

Sexual Harassment Redress System

The Act has stipulated that all Companies set up an Internal Committee ('POSH Committee') to redress Complaints on Sexual Harassment. The POSH Committee must be:

- Presided by a senior woman executive ('Presiding Officer / Chairperson').
- Not less than half of its members should be women.
- The POSH Committee should invite a third party- NGO, or any other association committed to the cause of women or a person familiar with the issue of Sexual Harassment ('External Member').

The Presiding Officer and every member of the POSH Committee shall hold office for a period not exceeding three years, from the date of their nomination. A member of the POSH Committee may resign at any time by tendering his resignation in writing to the Company.

Removal or Replacement of POSH Committee member or Presiding Officer

In the event that the Presiding Officer and / or any member of the POSH Committee:

- contravenes any provisions of the Policy; or
- has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- has so abused his / her position as to render his / her continuance in office prejudicial to public interest, such Presiding Officer or member as the case may be, shall be removed from the POSH Committee.
- Any vacancy created due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by the Company in accordance with the appropriate guidelines.

Branch POSH Committee

As the Company has its presence in multiple locations, every branch/unit has its own POSH Committee where inquiry and redress may be sought.

The POSH Committee would comprise of a minimum of four (4) Persons:

- Three employees could be invited to sit on the POSH Committee. This would include a Presiding

Officer who, as defined above, would be a senior woman employee and who would chair the meetings of the POSH Committee.

- The fourth member should be an External Member as defined above.
- Half of the Members at all times shall be women representatives.

POSH Committee - A minimum of three members, including the Presiding Officer and the External Member shall form the quorum for the Hearings. Additional members may be inducted into the POSH Committee, in accordance with the requirements under the Act.

Scope of the Policy

This Policy is applicable to all Employees of the Company in India. Local country laws will take precedence over this Policy, in other geographies, if applicable.

Redress Procedures

A Complainant can make a Complaint, in writing, to the concerned POSH Committee, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident. The POSH Committee may, for the reasons to be recorded in writing, extend the time limit of three months, if it is satisfied that the circumstances were such which prevented the Complainant from filing a Complaint within the said period. POSH Committee will also allow complaints to be filed on behalf of the Aggrieved Individual, in the following circumstances:

If the Aggrieved Individual is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by:

- his/her relative or friend; or
- his/her co-worker; or
- an officer of the National Commission for Women or State Women's Commission; or
- any person who has knowledge of the incident, with the written consent of the Aggrieved Individual.

If the Aggrieved Individual is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by:

- his/her relative or friend; or
- a special educator; or
- a qualified psychiatrist or psychologist; or
- the guardian or authority under whose care he/she is receiving treatment or care; or
- any person who has knowledge of the incident jointly with the Aggrieved Individual relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care.
- If the Aggrieved Individual for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his/her written consent.
- If the Aggrieved Individual is deceased, a complaint may be filed by any person who has knowledge of the incident, with the written consent of his/her legal heir.

If the Complaint is made against a third party or any other person who is not an Employee of the Company, the POSH Committee shall advise the Complainant to file a Complaint with the police immediately. The option of whether the Complaint should be filed with the police or not is left with the Complainant, but the support of the Company in filing the Complaint shall always be ensured.

- The form in which the Complaint is required to be made is made available in the website of the Company. This form will be given by the Complainant to the respective POSH Committee and email the complaint to **cs@avpinfracon.in**. However, any written Complaint received in any form other than the form prescribed shall also be accepted. The Complaint can be submitted to the POSH Committee electronically at **cs@avpinfracon.in** or may be physically submitted to any POSH Committee member.
- If the complaint is made physically, the Complainant shall submit three copies of the Complaint along

with supporting documents and relevant details concerning the alleged incident(s), the name and details of the Respondent and names and addresses of the witnesses.

- If the Aggrieved Individual is unable to make a complaint in writing for any reason, he/she may contact the POSH Presiding Officer / Member of the POSH Committee whose details are provided on the notice board of the Branch and they shall render assistance to such aggrieved individual for making the complaint in writing.
- The Aggrieved Individual may file a complaint in person during office hours or call in advance to set up an appointment to meet elsewhere if he/she does not want to come in person to the office.

Conciliation

- Prior to initiating an inquiry, the POSH Committee may, at the request of the Complainant, take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement is made the basis of such conciliation. Such settlement could include an apology from the Respondent, Respondent agreeing to gender sensitization and related training or any other settlement agreement arrived at. In case a settlement has been arrived at the POSH Committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation of the POSH Committee.
- The POSH Committee will provide copies of the settlement as recorded to the Complainant and the Respondent. Upon a conciliation being reached, the POSH Committee would not be required to conduct any further inquiry.

Inquiry

- Subject to the above and in the event of any term or condition of the settlement not been complied with by the Respondent, the POSH Committee shall conduct an inquiry regarding the Complaint.
- A copy of the statement of the Complainant shall be given to the Respondent within a period of seven working days. If the complaint has been received on email, the POSH Committee may either forward or supply a print out the same to the Respondent, with clear instructions that the same is not to be shared with any other employee of the Company or third party.
- The Respondent shall file his reply in Response Form (Appendix II) to the Complaint along with a list of documents, and names and addresses of witnesses, within a period of ten working days from the date of receipt of the documents.
- The POSH Committee shall make an inquiry into the Complaint in accordance with the principles of natural justice. The POSH Committee must notify in writing, the time and dates of its meetings to the Company, the Complainant and the Respondent, not less than five days in advance of any such meeting.
- While conducting the inquiry, a minimum of three members of the POSH Committee including the Presiding Officer and the External Member shall be present.
- The POSH Committee shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.
- The POSH Committee shall have the right to terminate the inquiry proceedings or to give an ex-parte decision on the Complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Presiding Officer. Provided that such termination or ex-parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
- The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the POSH Committee. However, they may be allowed to bring a colleague for support, at the discretion of the POSH Committee, provided such colleague will not be permitted to interfere directly with the proceedings except to advise each party privately.
- Minutes will be taken down to record the proceedings.
- The inquiry shall be completed within ninety days from the date of receipt of the Complaint. The conclusions of the POSH Committee will then be informed to the parties in writing following the

investigation. These conclusions will recommend action to be carried out by the General Manager/ Senior VP, HR of the Company.

- A copy of the documentation should be sent to the Presiding Officer of the POSH Corporate Committee. This is important as the POSH Corporate Committee is required to compile an Annual Report to the Government on the log of Complaints and the action taken to redress the Complaints.

Action during Pendency of Inquiry

- During the pendency of an inquiry, on a written request made by the Complainant, the POSH Committee may recommend the following actions to be taken:
  - transfer the Aggrieved Individual or the Respondent to any other workplace
  - grant leave to the Aggrieved Individual up to a period of three months
  - grant such other relief to the Aggrieved Individual as may be prescribed under applicable law
  - restraint the Respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer.
  - The leave granted to the Aggrieved Individual shall be in addition to the leave he/she is otherwise entitled to.
  - On receiving a recommendation from the POSH Committee, the Company shall implement the recommendations and send a report of such implementation to the POSH Committee.

Disciplinary Action

- On the completion of an inquiry the POSH Committee shall provide a written report of its findings to the Company within a period of ten days from the date of completion of the inquiry and such report be made available to the concerned parties.
- In the event that the POSH Committee arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.
- In the event that the POSH Committee arrives at the conclusion that the allegation against the Respondent has been proved, possible disciplinary action will be in direct proportion to the seriousness of the offence. It could range from:
  - A letter of warning that will be placed in the personal file for an offence that is deemed minor by the POSH Committee such as offensive behavior that is verbal, graphic or through gesticulation.
  - Immediate transfer or suspension without pay for a Complaint of harassment that is written or if more than one Complaint is lodged against a single person for a minor offence.
  - Dismissal of the Respondent will be invited if the offence is serious enough such as in the case of emotional and physical harassment.
  - When there are Complaints punishable under the Indian Penal Code, 1860, the Company shall take action in accordance with the Act and provide assistance to the Aggrieved Individual, if she so desires, to lodge the Complaint with the appropriate authority.
  - Deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved Individual or to his/ her legal heirs. In case the Company is unable to make deductions from the salary of the Respondent due to his being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum referred above, the POSH Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.

The disciplinary action recommended by the POSH Committee should be disclosed to the Respondent and the Complainant separately. The POSH Committee at all times shall be sensitive to the possibility of the Respondent displaying retaliatory behavior. The Company shall act upon the recommendation given by the POSH Committee within sixty days of receipt of the recommendation

Procedure for determining compensation

The POSH Committee may consider various factors as required under the law for the purpose of determining the sums to be paid to the Aggrieved Woman and may take the following into consideration:

- the mental trauma, pain, suffering and emotional distress caused to the aggrieved woman.
- the loss in the career opportunity due to the incident of sexual harassment.
- medical expenses incurred by the victim for physical or psychiatric treatment.
- the income and financial status of the Respondent.
- feasibility of such payment in lump sum or in instalments.

Non Retaliation

The Company will not accept, support or tolerate retaliation in any form against any Employee who, acting in good faith, reports suspected misconduct, asks questions or raises concerns. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary action.

- Retaliation will be treated as a major misconduct.
- Retaliation against those reporting Sexual Harassment is prohibited by this policy.
- Retaliation means and includes any hurtful employment action against an individual/s.
- Anyone suspecting or experiencing retaliation should report to the appropriate authorities.
- Anyone feeling that a retaliation complaint did not get a prompt response can contact the Head - HR directly.
- Retaliation cases are treated as seriously as an alleged case of Sexual Harassment even if the original Sexual Harassment Complaint is not proven.

Malicious Complaint

In the case where a false Complaint has been filed and the investigation has proved that the motivation of the Complaint was purely to defame the Respondent, disciplinary action must be initiated against the Complainant. For a false Complaint of a serious nature, suspension for one week without pay and for false Complaints whose implications are less serious, a warning letter will be issued to the Complainant and a copy of the same will be maintained in their personal file. Mere inability to substantiate a Complaint or provide adequate proof need not attract action against the Complainant. Further, the malicious intent on part of the Complainant needs to be established through the inquiry process before any action against such Complainant is recommended by the POSH Committee to the Company.

Procedure for filing an Appeal

In the event that any person is aggrieved from the recommendations made by the POSH Committee or non-implementation of such recommendations, he/she may appeal to the appropriate authority, as specified by law, within a period of ninety days of the recommendations.

Confidentiality

The strictest confidentiality will be observed, therefore restricting all information generated to the smallest possible group. It must be ensured that the process is brief and quick. Any attempt by the members of the POSH Committee or the witnesses or any other persons involved in the inquiry to discuss or disclose this information to anyone except those directly involved with the Complaint will be treated with disciplinary action. Further, all the POSH Committee Members, General Manager, Human Resources Manager are required to sign a Confidentiality & Non-Disclosure Undertaking (Appendix III), declaring that they would maintain utmost confidentiality on all matters discussed under the purview of the POSH. This information will not be disclosed even to members of senior management who are not directly involved with the Complaint

The contents of the complaint made the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the POSH Committee and the action taken on the Respondent shall not be published, communicated or made known to the public, press and media in any manner. If the same is violated, the Company shall recover a sum of Rupees five thousand as penalty from such person or take action as per the provisions of the service rules.

However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

Roll Out Action Plan

The emphasis of the Policy should be preventive rather than prescriptive. To facilitate this approach, every Employee requires to be aligned to what the Company defines as appropriate and inappropriate behavior.

Duties of POSH Committee

The POSH Committee of the Company shall have the following duties:

- Follow the principles of natural justice and treat the Complainant, Respondent, witnesses and related persons to the inquiry with dignity and respect and give both the Complainant and the Respondent a fair opportunity to make their submissions.
- Submit to the Company and to the POSH Corporate Committee an annual report comprising details of all cases and actions taken and provide for the following details:
  - number of complaints of sexual harassment received in the year.
  - number of complaints disposed of during the year
  - number of cases pending for more than ninety days.
  - number of workshops or awareness programs carried out.
  - nature of action taken by the Company.
- To make efforts to ensure that the Complainant and the witnesses are not further victimized or discriminated against while the complaint is pending.
- Keep the matter confidential and assist Aggrieved Individual in filing the complaint, in case the person is unable to do so.
- To ensure the safety of the Complainant and witnesses during the pendency of the enquiry and till the final disposal of the complaint, if the Respondent intimidates the Complainant or witnesses and take action against anyone who threatens or intimidates the Complainant or members of the POSH Committee.
- To regularly organize and carry out programs for gender sensitization of members of POSH Committee through workshops, seminars, posters, film shows, debates etc. with assistance from POSH Corporate Committee.
- If an employee faces sexual harassment outside of the company work and work premises, assist them in filing a complaint in the police station as appropriate.
- To keep complete and accurate documentation of the complaint, its investigation and the resolution thereof.
- Set an example of proper and appropriate workplace behavior and ethical standards in line with Tata Values and Tata Code of Conduct.

Duties of the POSH Corporate Committee

- To collate and review statistical details received by POSH Committees of the Company.
- To regularly organize and carry out programs for gender sensitization of members of POSH Committee of Companies through workshops, seminars, posters, film shows, debates etc. It may enlist the help of specialized NGOs to carry out these programs.
- To draft, review or amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

Duties of the Employees

- To support/co-operate during any investigation as part of the inquiry process and provide a full and truthful disclosure of relevant information and assist with investigations.
- Be aware of and abide by laws applicable to them, their job and the Company's policies and procedures and set an example of proper workplace behavior and ethical standards.
- Be aware that the Company will take allegations seriously and will ask their cooperation in an investigation if they bring a complaint forward.
- Participate in the procedure of investigation if a complaint is brought forward, it will be reviewed. If

an employee elects not to participate in the procedure constituted by the Company and does not wish to proceed with the complaint, it will need to be formally withdrawn. The complaint will still be reviewed and the findings of the complaint will be explained in writing. It will be the discretion of the management to accept or reject the request for withdrawal of the complaint.

- Handle information related to known or suspected violations of this policy in a discreet and confidential manner and not attempt to investigate the information or suspected violations of this policy on their own
  i.e. without involving the POSH Committee.
- Participate in gender sensitization programs through workshops, seminars, posters, film shows, debates etc.
- Set an example of proper workplace behavior and ethical standards in line with Tata Values and Tata Code of Conduct.

Duties of the Company

- Treat sexual harassment as misconduct under the service rules.
- Encourage respectful and dignified behavior at workplace.
- Display at conspicuous places in the workplace, the penal consequences of sexual harassment.
- Organize workshops and awareness programs at regular intervals for sensitizing employees with the provisions of this policy.
- Carry out orientation programs and seminars for the members of POSH Committee and conduct capacity building and skill building programs for the members of POSH Committee.
- Carry out employee's awareness programs and create forum for dialogues.
- Declare the names and contact details of all the members of POSH Committee.
- Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the law.
- Ensure that necessary facilities and information are provided to the POSH Committee for dealing with the complaint and conducting an inquiry.
- Assist in securing the attendance of Respondent and witnesses before the POSH Committee and make available such information to the POSH Committee as it may require with regards to the complaint.
- Provide assistance to the Complainant if the Complainant chooses to file a complaint in relation to the offence under the Indian Penal Code.
- Cause to initiate action, under the Indian Penal Code, against the Respondent, or if the Complainant so desires, where the Respondent is not an employee, in the workplace at which the incident of sexual harassment took place.
- Monitor the timely submission of reports by POSH Committee and include in its report the number of cases filed (if any) and their disposal, in the annual report of the Company or where no such report is required to be prepared, intimate such number of cases to the District Officer.

Duties of the Manager

Manager is a reporting authority or anyone who is responsible for the outcome of work and has a reporting relationship with the Complainant in the Company.

Manager has the same duties as the employee, as well as these additional responsibilities as a custodian of the Tata Values, Tata Code of Conduct and statutory guidelines. If an Aggrieved Individual has conveyed about sexual harassment to the manager, it is the responsibility of the manager to encourage the Complainant to give it in writing to him/her and the POSH Committee.

- Bring the written complaint immediately to the POSH Committee, and provide all kinds of support for the further investigations as a part of inquiry process.
- Have adequate knowledge about applicable laws, and answer questions regarding relevant policies and procedures.
- Immediately forward any report or complaint of an alleged violation of this Policy and all relevant or requested information to the Human Resources.
- Keep disclosed information as confidential. Handle information in a discreet manner, and disclose confidential information strictly on a need-to-know basis only.

- Not attempt to investigate or verify the information unless instructed by the Human Resources or Legal Department personnel in charge of the investigation and the POSH Committee.
- Fully cooperate, facilitate and aid the prompt handling of an investigation by POSH Committee, Human Resources, the Legal Department or the management.
- Allow the complainant, respondent, witnesses and allied parties to attend the inquiry proceedings at the stipulated time and place.
- Carry out all corrective measures and remediation established in the final decision.
- Ensure that employees are adequately informed about the Policy.
- Ensure no retaliation and zero tolerance to sexual harassment or inappropriate conduct.
- Set an example of proper workplace behavior and ethical standards in line with Tata Values and Tata Code of Conduct.

Duties of Human Resources

Human Resource team members have the same duties as the employee and additional responsibilities as a custodian of the company's Code of Conduct and statutory guidelines.

Make information, policies and procedures available to employees via the Human Resources department of the Company.

Take cognizance of the written complaint and bring the complaint immediately to the POSH Committee and provide all kinds of support for the further investigations as a part of inquiry process.

Ensure that employees and other stakeholders are communicated properly about the Policy.

Not attempt to investigate or verify the information unless instructed by the legal Department personnel in charge of the investigation and the POSH Committee.

Carry out all corrective measures and remediation established in the final decision.

Set an example of proper and appropriate workplace behavior and ethical standards in line with Tata Values and code of conduct.

Awareness of Appropriate Behavior

The most important step in this direction is the communication cascade. A presentation has been prepared and has been made to every Employee. The interactive training presentation is available on mi-university as well and can be accessed by all employees.

Employees who would like to further clarify their understanding of the Policy will be encouraged to call the respective branch POSH Committee whose contact information will be publicized on the notice board in their respective branches.

The HR Department of the Company is responsible for enforcing the POSH Policy. Employees may contact their Human Resources Department or respective Posh Committee members whose names are displayed in the notice board of respective branches if they have any questions with regards to the Policy.

Evaluation

The Policy should be evaluated so that any amendments required may be recommended by the POSH Committee based on their experience of dealing with Complaints. This exercise may be an annual exercise at the minimum. The Policy will have to be flexible, as each situation will throw up situations that the Policy will not cover.