

Subject: Internal Policy on Prevention of Sexual Harassment at Workplace



## **INTERNAL POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE**

## **A. INTRODUCTION**

AMASTCO Limited (the “**Company**”) is an equal employment opportunity company and is committed to creating a healthy work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. Sexual Harassment infringes the fundamental right of a woman to gender equality under Article 14 and 15 of the Constitution of India and her right to life and live life with dignity under Article 21 of the Constitution of India which includes right to a safe environment free from sexual harassment.

The Company also believes that all its employees have the right to be treated with dignity. Sexual harassment is therefore unacceptable and regarded as misconduct as per this policy. In order to deal with sexual harassment at the workplace and as required under ‘The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the “**Act**”), this policy provides for protection against sexual harassment at the workplace, for the prevention and redressal of complaints of sexual harassment and to enforce strong disciplinary action in the event of any such incident.

This policy document details the relevant terms and definitions relating to sexual harassment in the workplace; the complaint and redressal mechanisms; and relevant guidelines for all employees.

## **B. POLICY OBJECTIVES**

The Company is committed to treating every Employee with dignity and respect. To reinforce Company’s commitment to foster and create a workplace which is safe and free from any act of Sexual Harassment; the Policy encompasses the following objectives.

- To define Sexual Harassment.
- To lay down the guidelines for reporting acts of Sexual Harassment at the workplace; and
- To provide the procedure for the resolution and redressal of complaints of Sexual Harassment.

## **C. SCOPE AND EFFECTIVE DATE**

- a) This Policy extends to all employees of the Company at all its locations and establishments; and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.
- b) The policy may be amended from time to time, based on changes in Company’s internal policies, or changes to the Act, or its rules, applicable law. Please refer to our website on [www.atmastco.com](http://www.atmastco.com) for the current version of this policy.

#### D. DESCRIPTION AND DEFINITION OF TERMS

Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- physical contact and advances; or
- a demand or request for sexual favours; or
- making sexually coloured remarks; or
- showing pornography; or
- any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

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 –

- i. implied or explicit promise of preferential treatment in their employment; or
- ii. implied or explicit threat of detrimental treatment in their employment; or
- iii. implied or explicit threat about their present or future employment status; or
- iv. interferes with their work or creating an intimidating or offensive or
- v. hostile work environment for them; or
- vi. Humiliating treatment likely to affect their health or safety.

**For a further explanation of what kinds of acts constitute sexual harassment, please read the FAQ's.**

**“Employee”** means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor with or, without knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether terms of employment are expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

*Explanation:* The aforesaid definition of ‘Employee’ shall be used only for the purposes of the Policy and cannot be used to claim the rights of an employee conferred by any law for the time being in force.

**“Internal Complaints Committee (ICC)”** means the committee constituted by the Company to investigate complaints of sexual harassment, in the manner prescribed under the law.

**“Respondent”** means a person against whom a complaint of sexual harassment as set out in this policy has been made.

**“Workplace”** includes any office or actual place of work including any department, organization, undertaking, establishment, enterprise, institution, branch, or unit and site which are owned, controlled, or financed directly or indirectly by funds provided by ATMASTCO and any place visited by the Employee (as defined above) arising out of or during the course of the employment including transportation provided by the Company for undertaking such journey and any place for any event in connection to work including places where an employee is present for work-related activities, such as meetings, training, conferences, or social events sponsored by ATMASTCO.

**“Aggrieved woman”** means, in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

**“Complaint”** means any complaint (written or oral form) made by a female Employee against any other employee within ATMASTCO or any Third-Party having business dealings with ATMASTCO.

### Composition of COMMITTEE (ICC)

As per the Act, every employer of a workplace shall, by an order in writing, constitute a Committee to be known as the Internal Complaints Committee "ICC".

The ICC shall consist of the following members nominated by the employer, namely:

- i. The Presiding officer who shall be a woman employed at a senior level at the workplace from amongst the employees.

*Provided that in case a senior-level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.*

*Provided further that in case the other offices or administrative units of the workplace do not have a senior-level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.*

- ii. 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.
- iii. 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.

*Provided that at least one-half of the total Members so nominated shall be women.*

- iv. The Presiding Officer and every Member of the ICC shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.
- v. The Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceedings of the ICC, by the employer, as may be prescribed.

As mentioned hereinabove, the ICC shall consist of a minimum of four members. While conducting the inquiry, it is mandatory that a minimum of three Members of the ICC (including the Presiding Officer or Chairperson) should be present. The Inquiry Committee shall preferably have one (1) external member from the ICC.

### E. DETAILS OF THE INTERNAL COMPLAINTS COMMITTEE (ICC)

Sl. No.	Name	Designation	Mobile No.	Email ID
1	Mrs. Annapoorani Iyer	Presiding Officer	8376062272	annapoorani@atmastco.com
2	Mrs. Reena Barai	Executive Member	9039036400	reena.b@atmastco.com
3	Mrs. Shibbi K Nair	Executive Member	9039036401	shibbi.nair@atmastco.com
4	Mr. S. Ishwar Rao	Member	9827930629	ishwar.rao@atmastco.com

a) The ICC shall be responsible for a fair and judicious enquiry into any complaint of sexual harassment in the workplace.

b) A quorum of 3 members, including the Chairperson, is required to be present for the investigation proceedings to take place.

c) The Board at its meeting held on May 12, 2025 had reconstituted the Committee. The tenure of the ICC members shall be 3 years from the date of re-constitution.

## **F. PROCESS & PROCEDURE**

- I. Any Aggrieved Woman may make, in writing, a Complaint of Sexual Harassment as per Annexure Template for Reporting Sexual Harassment to the ICC within a period of three months from the date of incidents, and in case of a series of incidents, within a period of three months from the date of last incident.  
*Provided that where such Complaint cannot be made in writing, the Presiding Officer or any Member of the ICC shall render reasonable assistance to the Aggrieved Woman for making the Complaint in writing.*  
*Provided further that the ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Aggrieved Woman from filing a Complaint within the said period.*
- II. Where the Aggrieved Woman is unable to make a Complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed under the Rules may make a Complaint.
- III. The ICC, may, before initiating an inquiry and at the request of the Aggrieved Woman take steps to settle the matter between her and Respondent through conciliation as per the provisions of the Act.  
*Provided that no monetary settlement shall be made as a basis of conciliation.*
- IV. Keeping in mind the criticality of the responsibility that has been bestowed upon the Committees, it is necessary for them to operate within realistic and reasonable time frames for the resolution of Complaints, depending upon the magnitude of seriousness. In any case, the Committees should initiate action expeditiously on Complaints received. The Committee should complete the inquiry process within a period of three months (90 days).
- V. The Committee at the written request of the Aggrieved Woman may recommend to ATMASTCO to restrain the Respondent from reporting on the work performance of the Aggrieved Woman or writing her confidential report and assign the same to another officer.
- VI. The redressal procedure should be as per the procedure prescribed under the Act and the Rules.
- VII. A copy of the full enquiry report along with all the annexures of the Complaint post completion of investigation process shall be made available by the Committee to the Employer.
- VIII. A copy of the report shall be provided to the Aggrieved Woman and the Respondent respectively. It must be ensured that the identity of the witnesses is kept strictly confidential.

## **G. ENQUIRY PROCESS**

a) The Inquiry will be conducted confidentially as per the provisions of the Act, and upon the aggrieved woman's request, shall grant her relief during the pendency of the inquiry including but not limited to leave with full pay.

b) The ICC shall interview the complainant, respondent and all relevant witnesses, if any, as part of its enquiry process. It shall complete the inquiry into the complaint within 90 days including all confidential interviews and examination of evidence. Within 10 days of completion of the inquiry, the ICC will submit its findings and recommendations to the Company's management.

c) In case the complaint does not fall under the purview of Sexual Harassment it shall be concluded after recording the reasons thereof.

d) In case the complaint is found to be false, the Complainant shall, if the complaint is found to be with malicious intent as per the inquiry in accordance with the procedure prescribed, be liable for appropriate disciplinary action by the management on the recommendation of the ICC.

e) The management will direct appropriate action in accordance with the recommendations proposed by the Committee. Appropriate disciplinary action can include monetary compensation to the complainant, verbal or written reprimands, counseling, withholding of promotions or other benefits, or termination of employment.

## **H. RETALIATION**

This policy recognizes retribution or retaliation in the context of reporting acts of sexual harassment as a serious violation. The report and investigation of allegations of retaliation will follow the procedures set forth in this Policy and will be treated as an additional complaint and investigated similarly. Any person found to have retaliated against an individual for reporting harassment, or for participating in an investigation of allegations of such conduct, may expect the Company to impose severe disciplinary action.

## **I. RESPONSIBILITIES**

### **1. Employee responsibilities**

The Company expects all its employees to comply with its policy and code of conduct towards creating a respectful and dignified work-environment for all. Employees must:

- Familiarize themselves completely with this policy as well as its contents.
- Co-operate with any measures introduced to promote equal opportunities.
- Make sure they understand and respect the sensitivities of co-workers and other people in the workplace.
- Refrain from discriminatory, offensive or disrespectful behavior, or any behavior which is in contradiction to the letter or the spirit of this policy.

- Make sure they extend support to any person who they suspect is being harassed in addition to reporting any such instance of sexual harassment to the appropriate person/s.
- Maintain confidentiality regarding any aspect of a complaint or an inquiry of which they may have information or may be included.

## **2. Manager responsibilities**

As representatives of the Employer, the Company's managers are expected to present exemplary behavior, as well as play a strong supporting and guiding role for team members and others in adhering to this policy. Managers must

- Provide a safe place for their employees and team members and foster a discrimination-free environment.
- Communicate and provide support in understanding this policy.
- Handle any complaint that they receive with tact and maturity and take prompt action and communicate such issues to the appropriate person/s.
- Refrain from playing favorites, colluding, campaigning, gossiping or attempting to induce or pressure or otherwise interfere with such complaints or employees to influence an outcome.

## **Policy Implementation and review**

The policy will be implemented and reviewed by the Board on need basis. The Company reserves the rights to amend, abrogate, modify, rescind, reinstate the entire policy or any part of it at any time.

## ADDENDUM

### FAQs

#### *1. What is considered sexual harassment?*

Sexual harassment can include (but is not limited to) any one or more of the following unwelcome acts or behaviour (whether directly or by implication), such as -

- An unwelcome act of inappropriate physical intimacy, like grabbing, brushing, touching etc.
- An unwelcome remark with sexual connotations, like sexually explicit comments or compliments / jokes with sexual connotations/ making sexist remarks etc.
- Sharing of any sexually explicit visual material, in the form of pictures / cartoons / screen savers on computers /any offensive written material or sms's /pornographic e-mails, etc.
- Engaging in any other unwelcome conduct of a sexual nature, which could be verbal, or even non-verbal, like staring to make the other person uncomfortable, making offensive gestures, kissing sounds, etc.
- Making an unwelcome demand or request (whether directly or by implication) for sexual favors from another person.
- A superior requesting or implying a request for sexual favors from a junior in return for advancement or benefits or negative threats whether direct or implied.
- A person in power making intrusive inquiries or references about the private lives of employees, or persistently asking them out.
- A group of workers joking about sexual conduct (even amongst themselves) in an attempt to humiliate or embarrass another person.
- Acts or conduct by a person in authority that renders the environment at workplace hostile or intimidating to a person belonging to the other sex.

Please remember that in cases of sexual harassment, the intent of the perpetrator is irrelevant; and it is the impact on the aggrieved person that is considered pertinent.

#### *2. What should I do if I think I am being sexually harassed?*

Please let an ICC member know right away. Unfortunately, ignoring sexual harassment does not make it go away. Please read the policy on PSHW and make a written complaint of the behavior.

#### *3. What should I do if I feel I have been discriminated against or harassed, but I don't think it is sexual harassment?*

Please let your supervisor or a Management Committee member know right away. The Company prohibits discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity, gender expression, marital status, age, disability, nationality or background.

#### *4. I'm being harassed by someone who is not an employee, but who visits the Company to conduct business. Is there anything I can do?*

Yes, you can report the issue as Sexual Harassment. The policy applies to the extended workplace, as well as situations involving an external stakeholder.

*5. I think I was witness to something which may be Sexual Harassment, but it is not directed at me. What should I do?*

Anyone who witnesses inappropriate comments or conduct, even if it is directed at someone else, can still feel uncomfortable and harassed. If you witness conduct that you believe might be sexual harassment and are not sure, please contact your supervisor or a Management Committee or ICC member who can guide you.

*6. Will my complaint be treated confidentially?*

The Company will make every practicable effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties. Each situation is resolved as discreetly as possible, with information shared only with those who need to know in order to investigate and resolve the matter. The organization will be sensitive to the feelings and situation of the alleged victim and anyone who reports sexual harassment. However, the organization will need to address the issue and try and get as much information as possible while keeping the information confidential. All employees are also constrained to follow confidentiality to the maximum possible extent.

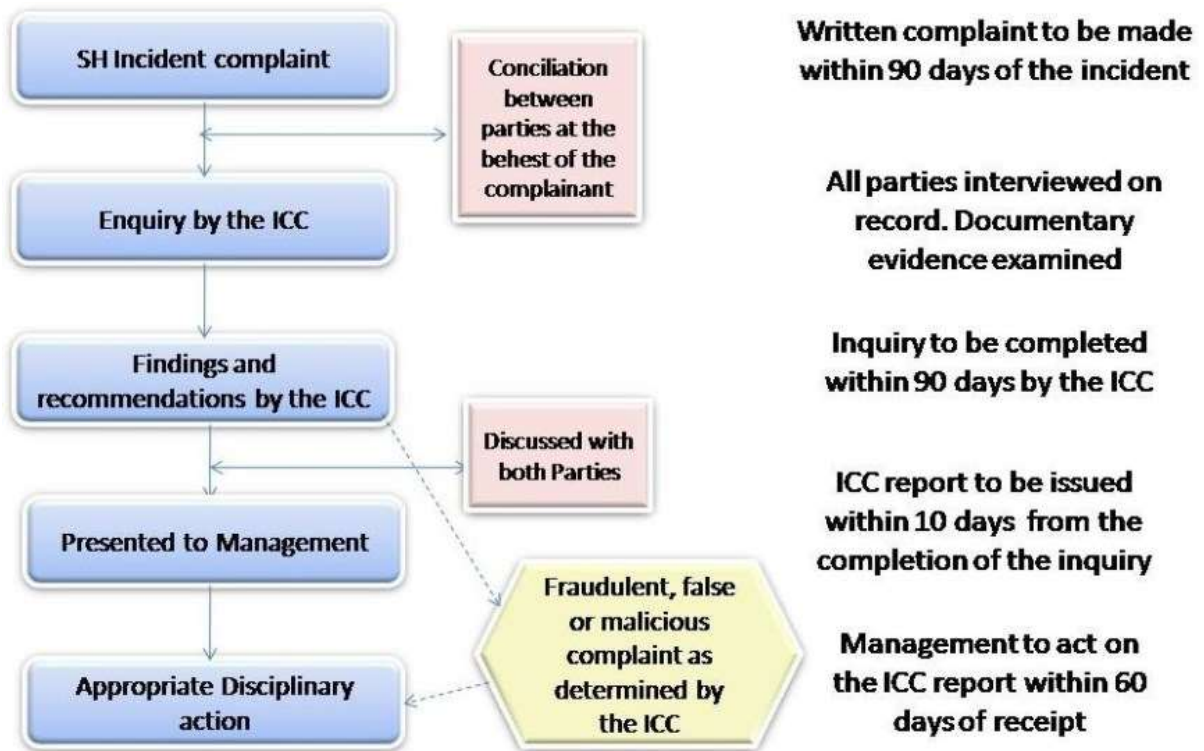
*7. How will a false allegation of sexual harassment be handled?*

When someone intentionally reports information or incidents that they know to be untrue, or lies to make a claim, or makes a malicious complaint, or provides false or forged documents during a complaint or an inquiry; it is considered a fraudulent claim. Disciplinary action may be imposed on individuals who make false allegations of sexual harassment upon enquiry of the same. Failure to prove a claim of harassment is not equivalent to a false allegation.

*What else can I do?*

- Feel empowered to set your own boundaries. Say "NO" emphatically and clearly when you are asked to do things, go places, respond to questions, or engage in situations that make you uncomfortable. Do not worry about offending the other person or damaging relationships. Take care of yourself first and ensure you communicate directly and clearly if you are uncomfortable with any inappropriate behavior.
- Be aware of situations and people around you. Don't ignore other's warnings about particular people or locations or social settings.
- Trust your own instincts about possible danger. In an uncomfortable situation remove yourself from the situation immediately. Regardless of your previous behavior or signals, you have the absolute right to halt any inappropriate or unwelcome exchange at any time.

## THE REDRESSAL PROCESS – EXPLAINED



## ANNEXURE

### ICC GUIDELINES

All ICC members must consider the prevention of sexual harassment in the workplace as their responsibility and obligation; and must proactively initiate measures to achieve the same, including communicating to employees, and sensitizing and educating them through periodic trainings. In addition, they must

- a) Familiarize themselves with the details of the Act, and its rules; and any other amendments or notifications that may be made.
- b) meet regularly to update themselves on and review the details of any complaints that may have been made, and inquiries conducted
- c) Be responsible for submitting an annual report on all complaints of this nature to both the Management as well the District Officer, in the manner prescribed.
- d) keep in mind the covert and insidious nature of sexual harassment, and stay sensitive to the practical and societal difficulties in reporting such acts
- e) be sensitive to the difficulties in providing direct or corroborative evidence of such incidents

**Further, while conducting an investigation, ICC members shall follow their own code of conduct:**

1. Shall be cognizant of the implicit and explicit power equations between all parties, including organizational hierarchy and influence as well as the relative socio-economic differences, while evaluating testimonies and evidence.
2. Shall not conduct any enquiry or allow any evidence about the complainant's personality, character, personal life, general behavior or personal and sexual history.
3. Shall guard against any bias in their own perception or investigation.
4. Shall keep both parties reasonably informed at their discretion about the status of the complaint and enquiry.
5. Shall stay impartial to both parties, and follow the principles of natural justice in its enquiries
6. Shall evaluate all testimonies and evidence applying a balance of probabilities.

## **ANNEXURE**

### **EMPLOYER GUIDELINES**

The Company is committed to providing a safe and respectful working environment and a harassment-free atmosphere. By means of this policy and other measures, it shall:

1. Ensure the communication of this policy, and any other relevant information, to all its employees.
2. Organize workshops and training programmes at regular intervals for sensitizing the employees regarding the provisions of the policy.
3. Provide necessary facilities to the ICC for dealing with complaints and conducting inquiries.
4. Assist in securing the attendance of respondent and witnesses before the ICC and make available any information the ICC may require in conducting its enquiry.
5. Provide assistance to the aggrieved person if they choose to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita (BNS), 2023.
6. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
7. In case the degree of offence is deemed coverable under The Bharatiya Nyaya Sanhita (BNS), 2023, then appropriate action shall be initiated by the Management, for making a Police Complaint.
8. Encourage all its vendors and other relationships to be compliant with the Act and communicate the Company's commitment to a harassment-free workplace both officially and informally to all its vendors.
9. To take such actions based on the findings and recommendations of the Internal Complaints Committee (ICC) as per the Act.
10. Proper protection against retaliation to complainants, witnesses, committee members and other employees involved in prevention and complaint resolution.

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