

Prevention of Sexual Harassment at Workplace Policy

POLICY COMMITMENT: While the POSH Act, 2013 specifically protects women, Evans Electric Limited extends this protection to all employees irrespective of gender, ensuring a workplace free from sexual harassment for everyone. Evans Electric Limited is committed to a safe, dignified, inclusive and respectful workplace. Sexual harassment is prohibited and complaints will be handled promptly, fairly, sensitively and confidentially.

Legal basis: The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules, 2013, as amended from time to time.

1. Purpose and policy statement

This policy establishes the framework by which Evans Electric Limited (“EEL” or “the Company”) prevents, prohibits and redresses sexual harassment at the workplace. EEL adopts zero tolerance for sexual harassment, victimisation, retaliation, intimidation and interference with a complaint or inquiry. The statutory mechanism under the POSH Act is available to an “aggrieved woman” as defined by law. As an additional organisational commitment, EEL will address complaints raised by any person, irrespective of sex, gender identity or sexual orientation, under this policy and/or other applicable conduct and disciplinary procedures. This additional coverage does not reduce or replace any statutory right.

2. Scope and applicability

This policy applies to all EEL workplaces and to every person engaged with or visiting the Company, including:

- permanent, temporary, probationary, trainee, apprentice, casual, daily-wage and contract personnel;
- consultants, retainers, agency personnel, vendors, suppliers, customers, visitors and other third parties;
- persons working with or without remuneration, whether directly or through an agent; and
- Any woman, of any age, whether employed by EEL or not, who alleges sexual harassment at an EEL workplace.

“Workplace” is interpreted broadly and includes offices, plants, workshops, shop floors, warehouses, canteens, transport provided by EEL, customer/vendor sites, work-related travel, training, conferences, social events, accommodation arranged for work, and work-related digital or virtual interactions.

3. Key definitions

Term	Meaning
Aggrieved woman	A woman of any age, whether employed or not, who alleges that she has been subjected to sexual harassment at a workplace.
Employee	A person employed at a workplace for any work on a regular, temporary, ad hoc or daily-wage basis, directly or through an agent, including a contractor, with or without the principal employer's knowledge, whether paid or unpaid, and including a co-worker, probationer, trainee or apprentice.
Respondent	The person against whom a complaint of sexual harassment is made.
Internal Committee (IC)	The committee constituted by EEL under the POSH Act to receive and inquire into complaints.

4. What constitutes sexual harassment

Sexual harassment includes any one or more of the following unwelcome acts or behaviour, whether directly or by implication:

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

The following circumstances, if connected with sexual harassment, may also amount to sexual harassment: an express or implied promise of preferential treatment; threat of detrimental treatment; threat concerning present or future employment status; interference with work or creation of an intimidating, offensive or hostile environment; or humiliating treatment likely to affect health or safety.

5. Illustrative prohibited conduct

- unwelcome touching, brushing, blocking movement, staring or suggestive gestures;
- sexual jokes, comments about appearance or body, innuendo, propositions or repeated invitations after refusal;
- sending or displaying sexually explicit, suggestive or offensive messages, images, videos, emails or social-media content;
- quid pro quo conduct—linking employment benefits, ratings, shifts, training, promotion or continued employment to sexual cooperation;
- sexual rumors, intrusive questions about a person's private life, stalking or repeated unwanted calls/messages; and
- retaliating against a person for rejecting conduct, reporting an incident, supporting a complainant or participating in an inquiry.

IMPORTANT: The impact and unwelcome nature of the conduct are central. Intent alone does not determine whether conduct is inappropriate.

6. Internal Committee

EEL shall constitute an IC by a written order at every administrative unit, factory, establishments or office where required by law. IC members will ordinarily hold office for a term not exceeding three years from nomination.

Role	Statutory requirement
Presiding Officer	A senior woman employee. If unavailable at that workplace, nomination may be made from another EEL office/unit or, where permitted, from another workplace of the same employer.
At least two employee members	Persons committed to the cause of women, having experience in social work, or having legal knowledge.
One external member	A person from an NGO/association committed to women's causes, or a person familiar with issues relating to sexual harassment.
Gender composition	At least one-half of the total IC members must be women.

The names, contact details and tenure of IC members shall be displayed conspicuously and communicated to the workforce. A member shall disclose any actual or perceived conflict of interest and recuse where impartiality may reasonably be questioned.

7. Reporting and assistance

a. How to submit a complaint

A written complaint may be submitted to the Presiding Officer or any IC member, physically or through the designated confidential channel:

Channel	Details
Email	posh@evanselectric.co.in
Sealed cover	Presiding Officer, Internal Committee, Evans Electric Limited
In person	Any IC member or HR, who shall promptly forward it confidentially to the IC
SHe-Box	The Ministry of Women and Child Development's online complaint platform, where applicable

A complaint should ordinarily be filed within three months from the incident, or within three months from the last incident in a series. The IC may extend this period by up to a further three months for reasons recorded in writing if circumstances prevented timely filing.

If the aggrieved woman cannot make a written complaint, the IC shall provide reasonable assistance. Where she is unable to complain because of physical or mental incapacity, death or otherwise, a complaint may be made by a person authorised under the applicable Rules.

b. Immediate support

A person may approach the IC or HR for safety support even before deciding whether to file a formal complaint. EEL will, as appropriate, facilitate medical, counselling, accessibility, translation or legal support and explain available options without pressuring the person.

8. Resolution and inquiry procedure

1. Conciliation (only at the complainant's request)

Before commencing an inquiry, the IC may attempt conciliation only if requested by the aggrieved woman. Monetary settlement shall not be the basis of conciliation. If a lawful settlement is reached, the IC shall record it and provide copies to the parties; no inquiry will be conducted unless the settlement terms are not complied with.

2. Formal inquiry

If conciliation is not requested, is unsuccessful, or settlement terms are breached, the IC shall conduct an inquiry in accordance with the Act, Rules and applicable service rules. The inquiry will observe natural justice and procedural fairness.

- The respondent will receive the complaint and supporting documents and a fair opportunity to respond.
- Both parties may submit documents and witness details and will receive a reasonable opportunity to present their case.
- The IC may call persons, require documents and exercise the powers available to it under law.
- A minimum of three IC members, including the Presiding Officer, should be present for inquiry proceedings.
- Proceedings and evidence will be documented. Parties shall not intimidate, influence or retaliate against participants.
- The inquiry should be completed within 90 days.

Neither party may insist on legal representation before the IC, subject to the applicable Rules. The IC may adopt suitable arrangements for safety, accessibility and privacy, including separate waiting areas or technology-assisted participation, while preserving a fair opportunity to be heard.

3. Criminal complaint and other remedies

Where the aggrieved woman wishes to pursue a criminal complaint, EEL shall provide reasonable assistance. If the conduct may constitute an offence, the IC will inform her of the right to approach the police. The internal process does not prevent any person from using other remedies available under law.

9. Interim measures

During the inquiry, on the written request of the aggrieved woman, the IC may recommend appropriate interim relief, including:

- transfer of the aggrieved woman or the respondent;
- leave to the aggrieved woman for up to three months, in addition to regular leave entitlement;
- restriction of reporting, supervision or direct contact;
- temporary change in shift, work location, seating, transport or assignment; or
- other relief permitted by law and reasonably necessary for safety and fairness.

Interim measures are precautionary and do not imply a finding of guilt. EEL shall implement lawful IC recommendations and monitor compliance.

10. Inquiry report and action

The IC shall provide its findings to the employer and the parties within ten days of completion of the inquiry. EEL shall act on the IC's recommendations within sixty days, as required by law.

Finding	Possible action
Allegation proved	Action under applicable service rules/standing orders, which may include counselling, written apology, warning, withholding promotion or increment, reassignment, suspension, termination, deduction from salary for compensation where legally recommended, and/or other proportionate action.
Allegation not proved	The matter is closed without adverse action against the respondent. EEL may still address unrelated workplace concerns identified during the process through appropriate procedures.
Settlement breached	The IC may proceed with inquiry or forward the complaint as permitted by law.

Any appeal may be made to the court or tribunal prescribed by applicable law/service rules within ninety days of the recommendation or order, as applicable.

11. False or malicious complaints and evidence

If the IC concludes, after inquiry, that a complaint was malicious or that forged or misleading evidence was knowingly produced, it may recommend action in accordance with law and applicable service rules. Malice must be established through an inquiry; mere inability to substantiate a complaint or provide adequate proof does not attract action.

12. Confidentiality and records

The complaint, identities and addresses of the parties and witnesses, conciliation and inquiry proceedings, recommendations and action taken shall be kept confidential and shall not be published, communicated or disclosed except as permitted or required by law. Information about justice secured may be shared only without disclosing identifying details.

IC and HR records shall be stored securely with access limited to authorised persons. Records shall be retained for the period required under EEL's record-retention schedule and applicable law. Breach of confidentiality may lead to action under the Act, Rules and Company procedures.

13. Protection against retaliation

Retaliation, victimisation, intimidation, adverse treatment, threats, isolation, interference with evidence, or pressure to withdraw or alter a complaint is prohibited. Any suspected retaliation must be reported immediately to the IC or HR and may result in separate disciplinary action.

14. Responsibilities

Stakeholder	Key responsibilities
Employer / Management	Provide a safe workplace; constitute and support the IC; display the penal consequences of sexual harassment and the IC constitution order; provide facilities for inquiry; assist in securing attendance and information; conduct awareness programmes; support legal reporting when requested; and act on recommendations within statutory timelines.
Internal Committee	Receive complaints; provide assistance; assess interim relief; conduct fair and timely proceedings; maintain confidentiality; issue reasoned reports; prepare annual reports; and undertake prevention and awareness activities.
HR and managers	Model respectful conduct; escalate disclosures without investigating independently; preserve confidentiality; prevent retaliation; implement IC recommendations; and ensure employees can participate without disadvantage.
Employees and third parties	Maintain professional conduct; complete training; cooperate truthfully with proceedings; preserve confidentiality; avoid retaliation; and report concerns promptly.

15. Prevention, training and communication

- POSH orientation during induction and periodic refresher training for all employees;
- specialised training for IC members, HR, managers and supervisors;
- awareness in English and, where appropriate, Marathi and Hindi for shop-floor and contract workers;
- prominent display of the policy, IC details and penal consequences at entrances, notice boards, canteen, shop floor and digital channels;
- briefing of contractors, vendors and visitors on expected conduct; and
- periodic assessment of workplace risks, including transport, late shifts, isolated areas and digital communication.

16. Annual reporting and statutory compliance

The IC shall prepare an annual report for each calendar year and submit it to the employer and the District Officer in the prescribed manner. The report shall include the number of complaints received, disposed of and pending for more than ninety days; workshops/awareness programmes conducted; and the nature of action taken by the employer/District Officer.

EEL shall include the required POSH disclosure in its Board's Report or otherwise make the prescribed declaration where applicable. HR shall maintain a compliance calendar and evidence of IC constitution, displays, training, meetings, annual reporting and action taken.

17. Non-compliance

Failure to constitute the IC or comply with the Act may attract a fine of up to ₹50,000. Repeated contravention may lead to enhanced punishment and may affect the registration or license required for carrying on business, in accordance with law.

18. Policy administration

This policy shall be read with EEL's Code of Conduct, disciplinary procedures, standing orders, grievance framework, data-protection requirements and applicable law. If any provision conflicts with mandatory law, the law will prevail and the remaining policy will continue to operate. HR, in consultation with the IC and Legal/Compliance, shall review this policy annually and whenever there is a relevant legal or organisational change. Any amendment requires approval by the authorised management representative.

Annexure A — Confidential POSH Complaint Form

CONFIDENTIAL Submit this form to the Presiding Officer or any Internal Committee member. Attach additional pages or supporting documents if required.

1. Name of complainant

2. Employee ID / relationship with EEL

3. Department / organization

4. Contact details

5. Name and details of respondent

6. Date(s), time(s) and location(s) of incident

7. Detailed description of incident(s)

8. Witnesses, if any

9. Supporting documents / electronic evidence attached

10. Interim protection or assistance requested, if any

11. Any delay in filing and reasons, if applicable

12. Signature / thumb impression

13. Date and place

Declaration: I state that the information provided is true to the best of my knowledge and belief. I understand that the IC will handle the matter in accordance with law and this policy.

Annexure B — Complaint Receipt and Preliminary Action Record

Field	Record
Complaint reference number	
Date and mode of receipt	
Received by	
Date of incident / last incident	
Limitation reviewed	☐ Within 3 months ☐ Extension requested ☐ Reasons recorded
Writing assistance required/provided	
Immediate safety/support needs assessed	
Conciliation requested by aggrieved woman	☐ Yes ☐ No Date: _____
Conflict-of-interest check completed	☐ Yes ☐ No
Complaint copy sent to respondent	Date: _____
Inquiry commencement date	
Target completion date (within 90 days)	

Acknowledgment to complainant:

The Internal Committee acknowledges receipt of your complaint. Your information will be handled confidentially subject to legal requirements. The IC will contact you regarding the next step and any support or interim measures.

IC Member Name and Signature

Date _____

Annexure C — Internal Committee Constitution Order

Pursuant to Section 4 of the POSH Act, Evans Electric Limited hereby constitutes the Internal Committee for Head Office at Stantacruz with effect from 26th August 2026.

Sr.	Name and designation	IC role	Contact	Term
1	Michelle Kiny	Presiding Officer	+91 89285 11292	2026 – 2027
2	Christabel Silva	Employee Member	+91 91677 62309	2026 – 2027
3	Brett Dsouza	Employee Member	+91 98201 98599	2026 – 2027
4	Dilsi Isaac (Sr. Kripa Isaac)	External Member	+91 82913 34588	2026 – 2027

Pursuant to Section 4 of the POSH Act, Evans Electric Limited hereby constitutes the Internal Committee for Factory at Palghar with effect from 26th August 2026.

Sr.	Name and designation	IC role	Contact	Term
1	Michelle Kiny	Presiding Officer	+91 84228 46852	2026 – 2027
2	Bhagirath Kulkarni	Employee Member	+91 98234 46116	2026 - 2027
3	Ganesh Machhi	Employee Member	+91 98234 46116	2026 - 2027
4	Dilsi Isaac (Sr. Kripa Isaac)	External Member	+91 82913 34588	2026 – 2027

At least one-half of the total members are women. Members shall act independently, preserve confidentiality, disclose conflicts of interest and complete periodic capability-building.

Authorised signatory

Date and place _____

Annexure D — Inquiry Report Template

Report element	Details
Complaint reference / parties	
IC members present and conflict declarations	
Allegations / issues framed	
Response of respondent	
Evidence and witnesses considered	
Process followed and hearing dates	
Assessment of each allegation	
Finding with reasons	☐ Proved ☐ Not proved ☐ Partly proved
Recommendations	
Interim measures and compliance	
Date inquiry completed	
Date report issued to employer and parties	

Each participating IC member should sign and date the report. Any differing view should be recorded with reasons.

Annexure E — POSH Training Acknowledgment

I confirm that I attended EEL's POSH awareness programme and received access to the policy. I understand the standards of conduct, reporting channels, confidentiality requirements, prohibition on retaliation and my duty to cooperate truthfully with any proceeding.

Employee name

Employee ID and department

Training date / mode

Trainer

Employee signature and date

Annexure F — Annual Compliance Register

Compliance item	Status / evidence	Owner	Due date
Valid IC constitution order displayed at each applicable location			
IC member training completed			
Employee and contractor awareness completed			
Complaints received / disposed / pending >90 days recorded			
Recommendations implemented within 60 days			
Annual report submitted to employer and District Officer			
Board's Report / prescribed disclosure completed, where applicable			
Policy and posters reviewed in English/Marathi/Hindi			
Secure records and retention controls verified			

Annexure G — Quick Process Guide

Stage	Primary action	Indicative statutory timeline
1. Report	Written complaint to IC; writing assistance if required	Within 3 months; extendable by up to 3 months for recorded reasons
2. Optional conciliation	Only at the aggrieved woman's request; no monetary settlement as basis	Before formal inquiry
3. Inquiry	Notice, response, evidence, hearings and reasoned assessment	Complete within 90 days
4. Report	Findings and recommendations to employer and parties	Within 10 days of completion
5. Employer action	Implement lawful IC recommendations	Within 60 days
6. Appeal	To prescribed court/tribunal under applicable law/service rules	Within 90 days

Approval

Prepared / reviewed by	Approved by
Name: _____ Designation: _____ Signature: _____ Date: _____	Name: _____ Designation: _____ Signature: _____ Date: _____

SD/-

Rajesh Dattatray Dhekane

(Chief Executive Officer)