

Apraava Energy Group Entities



HANDBOOK ON PREVENTION OF SEXUAL HARASSMENT @ WORKPLACE

Version	Effective from	Due for review by
3.1	Dec 1, 2025	Dec 2027 or earlier

I. Policy Statement

Aprava Energy is committed to providing an environment free from sexual harassment. The company believes that every employee deserves to work in an environment free from sexual harassment. Sexual harassment is a form of misconduct that undermines the employment relationship. No employee should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct. Behavior that amounts to sexual harassment may result in disciplinary action, up to and including termination of the employment contract.

This Policy is framed in accordance with the provisions of the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** ("PoSH Act") and rules thereunder.

Sexual harassment is strictly prohibited and will not be tolerated. Any act of sexual harassment shall be treated as misconduct and will attract disciplinary action, up to and including termination, in addition to legal consequences under applicable law.

II. Applicability & Scope

This policy applies to all employees and contractors employed by Aprava Energy as well as trainees, consultants, vendors, visitors/ clients present at the workplace / extended workplace and at company events.

The policy would also apply if the incident involved employees / contractors employed by Aprava Energy as well as trainees, consultants, vendors, visitors/ clients outside the workplace.

It shall not apply to cases between two independent contractors engaged by the company and their employees or among such employees. Any action which does not involve an employee of Aprava Energy would follow a separate process except when it is on Aprava Energy premises or official functions.

All complaints related to sexual harassment will fall under the purview of this policy. All other grievances should be reported and will be addressed under the Company's Grievance Resolution procedures.

Workplace comprises office premises and extended workplace including travel, place of stay (like guest house, hotels, and township), company bus, office functions.

III. What is Sexual Harassment?

Sexual Harassment is defined as “where any form of unwarranted verbal, non-verbal or physical conduct of a sexual nature occurs with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.”

Sexual harassment includes unwelcome sexually tinted behavior, whether directly or by implication, such as

- i. physical contact and advances
- ii. demand or request for sexual favours
- iii. making sexually colored remarks
- iv. showing pornography, or
- v. any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Behavior that constitutes Sexual Harassment

Verbal

- Verbal abuse or comments that is sexual in nature
- Comments about people's bodies
- Sexually colored remarks
- Tales of sexual exploits and encounters
- Obscene phone calls
- Lewd and threatening letters
- Sexist jokes and cartoons

Non-verbal

- Graphic descriptions or display of pornography
- Sexually explicit gestures / Offensive gestures
- Indecent exposure
- Sexist and insulting graffiti
- Inappropriate gifts

Physical

- Unwelcome touching and hugging
- Sexual or physical contact
- "Accidentally" brushing sexual parts of the body

Virtual:

- Sending inappropriate messages, images, or videos via social media, emails, or messaging apps
- Sharing or forwarding sexually explicit jokes or content in workplace groups (e.g., WhatsApp, MS Teams)
- *Repeated, intrusive, or stalking-like online pings/message.* Refer *Annexure 2* for indicative examples of conduct amounting to Sexual Harassment.

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:

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

IV. Internal Committee

The company has constituted an Internal Committee (IC) of employees and an external member to hear and redress complaints pertaining to sexual harassment. The IC comprises the following:

- a) A Presiding Officer
- b) Members from amongst employees; and
- c) An external member

The term of the IC members shall not exceed 3 years and not less than half of the members shall be women.

Refer *Annexure 3* for constitution of the IC.

V. Reporting Harassment & Procedure for Redressal

Step 1: Any employee, prior to initiating the redressal procedure, is encouraged to try and resolve any grievance directly with the person/s concerned. It may emerge that the harasser realizes the effect of his / her behavior and may cease to display such behavior when confronted.

Step 2: However, if this is not possible or if after asking the person/s to stop, the harassment continues, the employee should send a written complaint to any member of the IC or write a mail to posh.apraava@apraava.com

Additionally, women can register their complaints related to sexual harassment on Sexual Harassment Electronic Box (SHe-Box) portal. Once a complaint is submitted to the SHe-Box portal (<https://shebox.wcd.gov.in/>) , it will be sent directly to the concerned authority having jurisdiction to take action into the matter. Please refer *Annexure 1* for more details.

Supervisors / HR representatives / other colleagues should not attempt to address the complaint themselves (no matter how trivial it may seem), but encourage the employee to approach the IC with the complaint.

Should the employee speak about the harassment to the immediate supervisor / HR representative / any other colleague, it is important that the employee understands that once the company becomes aware of an allegation, it must look into it and the employee should be encouraged to document the complaint and send it to an IC member. If a written complaint is sent to the immediate supervisor / HR representative / any other colleague, then the complaint should be sent to the IC Presiding Officer.

All complaints must necessarily be documented, by email or handwritten (in which case it must also be signed by the complainant).

Step 3: All complaints of sexual harassment will be handled by the IC.

Step 3.a.: The Internal Committee, may, before initiating an inquiry into the complaint, at the request of the complainant take steps to resolve the matter between the complainant and the defendant through conciliation. However, no monetary settlement will be made as a basis of conciliation.

In such cases, the Internal Committee will:

- i. Record the settlement and forward the same to the Director – Human Resources and Managing Director - India.
- ii. Provide copies of the settlement to the complainant and the defendant.

iii. Conduct no further inquiry into the complaint.

Step 3.b.: Should the terms or conditions of the settlement not be complied with by the defendant (OR) should the complainant not request conciliation, the Internal Committee will proceed with the inquiry into complaint.

Refer *Annexure 4* for harassment handling procedures.

Employees must also report any incident of perceived harassment that they are aware of, through the official channels mentioned here.

The broad timelines for dealing with a complaint is as mentioned below:

Aggrieved employee to file written complaint	Within 90 days of the incident
Copy of complaint to be sent to the defendant	Within 7 days of receipt of the complaint
Defendant to respond to the complaint	Within 10 days
Inquiry to be completed by the committee	Within 90 days
Case to be closed with appropriate action	Within 10 days

VI. Confidentiality

All information received during the redressal procedure will be kept confidential. Any employee not limited to complainant, respondent, or witness who breaches confidentiality will be subject to disciplinary action.

VII. Protection against retaliation

Regardless of the outcome of the complaint made in good faith, the complainant and any other employee providing information will be protected from any form of retaliation. While dealing with complaints of sexual harassment, the IC will ensure that the complainant or the witnesses are not victimized or discriminated against.

Any unwarranted pressures, retaliatory or any other type of unethical behavior while the investigation is in progress should be reported to the IC immediately. Disciplinary action will be taken against any such complaints which are found genuine.

VIII. Malicious complaints

This policy has been created as a tool to prevent harassment from occurring and the company will take immediate and appropriate action if harassment has occurred. However, if on investigation it is revealed that the complaint was made with a malicious intent, action will be taken against the complainant.

IX. Disciplinary Action

Where any misconduct is found by the IC, appropriate disciplinary action will be taken against the defendant. Disciplinary action will be commensurate to the degree of the misconduct and may include the complainant receiving a verbal or written apology, the defendant receiving a verbal or written reprimand, change in reporting/ team/ role/ location, withholding annual increment and incentive for a specified period of time, termination of employment, reporting to the police or relevant authorities.

Disciplinary action will also be taken in instances where a complaint is found to be malicious; an employee retaliates, threatens or victimizes another employee because of their involvement in the redressal procedure; or if unnecessary disclosure of information has occurred.

X. Dissemination of the Policy

In addition to this policy being uploaded on the Intranet, the company will also organize communication sessions at regular intervals for sensitizing employees on the issues and implications of workplace sexual harassment.

FREQUENTLY ASKED QUESTIONS

- Q.1 Can both men and women be victims of workplace sexual harassment?*
Both men and women can be victims of sexual harassment.
- Q.2 Is it harassment if the harassment is only verbal?*
Verbal harassment can constitute sexual harassment. Words can be just as offensive as physical acts and contact. Sexually coloured jokes, comments and stories can be equally harassing and can create a hostile work environment.
- Q.3 What if the harassment is not sexual in nature, but is still directed at me?*
Non-sexual conduct can still be harassment if it singles you out because of your gender or any other condition. If someone deliberately insults or ridicules you, that is harassment.
Harassment that is not sexual in nature should be reported and will be addressed under the Company's Grievance Resolution procedures.
- Q.4 Is it possible to be sexually harassed by someone who is the same sex as I am?*
Yes. Males can sexually harass males, and females can sexually harass females.
- Q.5 Is my complaint required to be made in writing?*
A complaint of sexual harassment should be made in writing.
Nonetheless, Apraava has a compelling interest to address all allegations of sexual harassment brought to its attention. Apraava reserves the right to take appropriate action in such circumstances, even in cases when the complainant is reluctant to proceed.
- Q.6 If a co-worker or supervisor comments on my clothing or appearance, is that sexual harassment?*
It depends on the nature of the comment. Telling an employee to dress more professionally is unlikely to be seen as sexual harassment. Frequently suggesting to an employee to wear a particular type of clothes, however, could be seen as sexual harassment. Likewise, an innocuous compliment, such as "that's a nice sweater," would not be harassment; but if it were followed up with a sexual reference ("it really shows off your body"), that type of behavior would be inappropriate. The key is whether the behavior, occurring because of the sex of the employee, creates a hostile or abusive work environment.
- Q.7 A fellow employee spends a lot of time downloading pornography from the Internet to his work computer. Is this sexual harassment?*
Is this employee's computer screen visible to anyone who passes? Does s/he draw others' attention to what s/he has downloaded? Does s/he continue to download

pornography after s/he has been told that others find it offensive? If so, this could be sexual harassment — just because the activity is not directed at you does not mean that you cannot be affected.

More importantly, use of Apraava's electronic resources for viewing pornographic content is strictly prohibited.

Q.8 The other day, a fellow employee told me a joke that had mild sexual content. I wasn't offended by it, and we both found the joke to be funny. Today, we both got a memo from our boss saying our conduct was inappropriate and a potential violation of the company's sexual harassment policy. Was the joke harassment?

While one joke alone may not be harassment, it could be part of a hostile environment. In this situation, you need to remember that the question is not whether you or the employee who told the joke was offended, but whether a "reasonable person" would find it offensive. The other point to remember is that someone must have found the joke offensive enough to report it, causing the boss to send the memo. This should be a warning that not everyone you work with shares your opinion as to what is or is not offensive. Take it as a sign that you need to be more careful with what you say at work.

Q.9 Is there anything I can do, if I'm being harassed by someone who is not a Apraava employee, but who comes to our office to conduct business?

Apraava's Policy on Prevention of Sexual Harassment at the Workplace Policy protects you from sexual harassment by vendors, contractors, and third parties you encounter in the course of your employment with Apraava. If you believe that you have been subjected to conduct that violates the policy, please contact speak to your supervisor, location HR or an IC member.

Q.10 What if I witness inappropriate conduct or someone tells me about it?

If you witness inappropriate conduct or someone tells you about it, please encourage that employee to make a written complaint. If the employee, however, is uncomfortable in doing so, you should feel free to report the incident to the Director – Human Resources / Managing Director – India or an IC member.

Q.11 Will my complaint be treated confidentially?

While Apraava cannot promise complete confidentiality in its handling of harassment complaints, Apraava will make every reasonable effort to handle inquiries, complaints and related proceedings in a manner that protects the privacy of all parties. Each situation will be resolved as discreetly as possible, with information shared with those who need to know in order to investigate and resolve the matter. In certain circumstances, Apraava may be able to address your concerns and stop the behavior without revealing your identity to the alleged

harasser. However, this is not possible in every matter, as some situations require the disclosure of the complainant's identity in order to fully investigate the matter and/or to enable the accused harasser the ability to fully respond to the allegations against him or her.

In its investigation, Apraava will be sensitive to the feelings and situation of the alleged victim and/or reporter of sexual harassment. Nonetheless, Apraava has a compelling interest to address all allegations of sexual harassment brought to its attention. Apraava reserves the right to take appropriate action in such circumstances, even in cases when the complainant is reluctant to proceed.

ANNEXURES

Annexure 1: SHe-Box Portal

SHe-Box Portal: Commitment to a Safe workplace



Key Features:

- **Comprehensive Coverage:** For all women, regardless of work status or sector
- **User-Friendly:** Easy access and straightforward process
- **Resources:** Centralised public repository of all Internal Committees and Local Committees across the country

How to Register Your Complaint?



1. **Visit:** SHe-Box Portal
<https://shebox.wcd.gov.in/>
2. **Requirements:** A valid email ID and mobile number
3. **Register:** Click on "Register your Complaint" on the homepage
4. **Submission:** Your complaint will be sent to the concerned Internal / Local Committee directly

Annexure 2: Examples of conduct amounting to Sexual Harassment

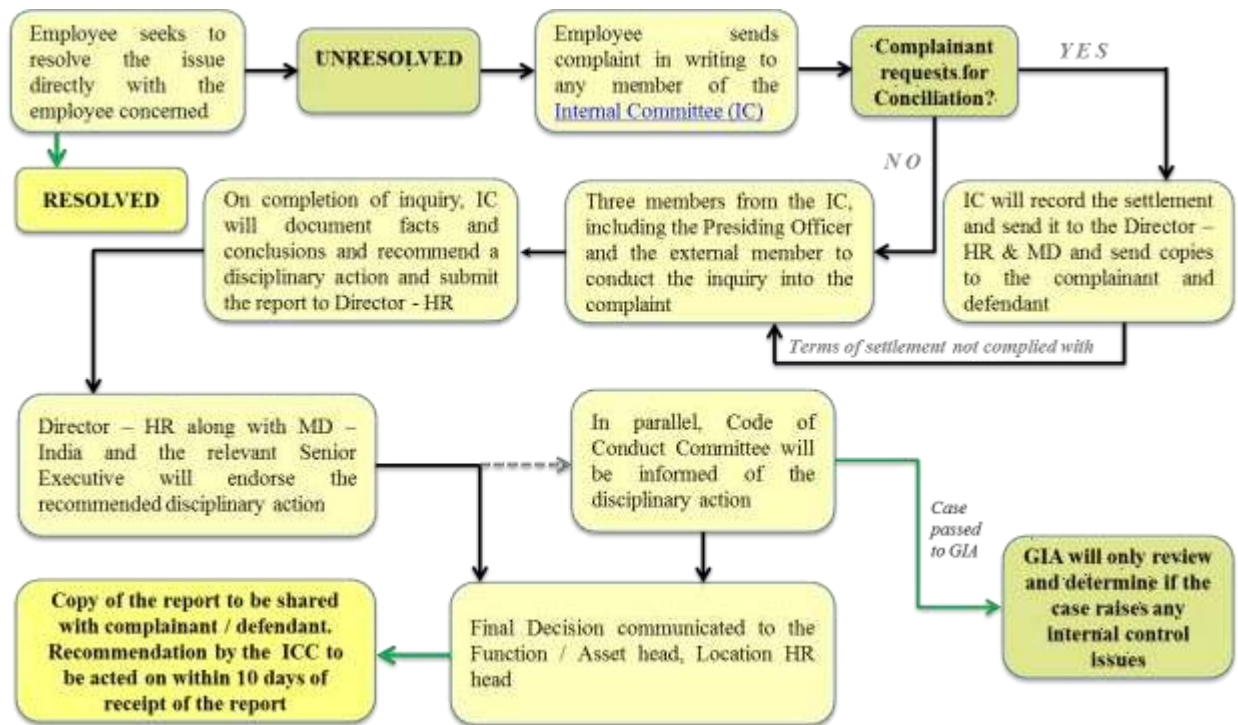
Whether a particular act or conduct could amount to sexual harassment is dependent on the specifics of the act and the circumstances; the following is an indicative list of conduct that could be considered as amounting to sexual harassment:

- i. Unwanted sexual advances or propositions
- ii. Offering employment benefits in exchange for sexual favors
- iii. Leering
- iv. Making sexual gestures
- v. Displaying sexually suggesting objects or pictures, cartoons, calendars or posters
- vi. Making or using derogatory comments, comments about a person's body or dress, slurs, epithets or sexually suggestive jokes
- vii. Written communications of sexual nature distributed in hard copy or via a computer network, suggestive or obscene letters, notes or invitations
- viii. Physical conduct such as unwanted touching, assault, impeding or blocking movements
- ix. Making or threatening retaliation after a negative response to sexual advances or for reporting or threatening to report sexual harassment
- x. Eve-teasing
- xi. Sexually tinted remarks, whistling, staring, sexually slanted and obscene jokes, jokes causing or likely to cause awkwardness or embarrassment
- xii. Subtle innuendoes or open taunting regarding perfection, imperfection or characteristic of physical appearance of a person's body or shape
- xiii. Gender based insults and / or sexist remarks
- xiv. Displaying pornographic or other sexually offensive or derogatory material
- xv. Forcible invitations for dates
- xvi. Forcible physical touch or physical assault or molestation
- xvii. Suggesting or implying that failure to accept a request for a date or sexual favors would adversely affect the individual in respect to performance evaluation or promotion
- xviii. Explicitly or implicitly suggesting sexual favors in return for hiring, compensation, promotion, retention decision, relocation, or allocation of job/responsibility/ work
- xix. Any act or conduct by a person in authority and belonging to one sex which denies or would deny equal opportunity in pursuit of career development or otherwise making the environment at the work place hostile or intimidating to a person belonging to the other sex, only on the ground of such individual providing or refusing sexual favors or physical confinement against one's will and any other act likely to violate one's privacy.

Annexure 3: Constitution of the Internal Committee (IC) for All Apraava Entities (Excl. JPL)

Employee Name	Contact Numbers	E-mail address
Madhurima Jain (Presiding Officer)	+91 22 67588888 +91 9819382087	madhurima.jain@apraava.com
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Annexure 4: Harassment handling procedures



Version No	Release Date	Changes
3	Dec-2024	• Reconstitution of POSH IC for JPL & Non-JPL entities • Change in appointment of external member
3.1	Dec-2025	• Inclusion of virtual harassment as an illustrative behaviour • Introduction of POSH email id for registration of complaints • Introduction of SHe-Box Portal id for registration of complaints • Change in appointment of external member
	Mar-26	• Change of IC member- Garima Kochar replaced by Binita Kalita