TGV SRAAC LIMITED ANTI-SEXUAL HARASSMENT POLICY

1. Introduction to the policy

TGVSRAAC Limited is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company believes that all employees of the Company have the right to be treated with dignity.

The company has zero tolerance towards sexual harassment and has adopted a policy that has been formed under the provisions of The Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013, to prohibit, prevent or deter the commission of acts of sexual harassment at workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

2. Scope

This policy is applicable to employees, workers, volunteers, probationer and trainees including those on deputation, part time, contract, working as consultants or otherwise (whether in the office premises or outside while on assignment). This policy shall be considered to be a part of the employment contract or terms of engagement of the persons in the above categories.

Where the alleged incident occurs to our employee by a third party while on a duty outside our premises, the Company shall perform all reasonable and necessary steps to support our employee.

3. What constitutes Sexual Harassment?

Sexual Harassment means such unwelcome sexually determined behaviour (directly or through implication), like physical contact and advances by the employee(s) including:

- A. A demand or request for sexual favors, sexually colored remarks, showing pornography, any other unwelcome physical conduct of sexual nature, , lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs,;
- B. Eve teasing, innuendos and taunts, physical confinement against one's will;
- C. A demand or request for sexual favors, whether verbally or non-verbally, where the submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or promotion/evaluation of work thereby denying an individual equal opportunity at employment;



- D. An act or conduct by a person in authority which makes the environment at workplace hostile or intimidating to a person or unreasonably interferes with the individual's privacy and productivity at work;
- E. Verbal harassment of a sexual nature, such as lewd comments, sexual jokes or references, and offensive personal references; demeaning, insulting, intimidating, or sexually suggestive comments (oral or written) about an individual's personal appearance or electronically transmitted messages (Jokes, remarks, letters, phone calls);
- F. Any other behaviour which an individual perceives as having sexual overtones.

Procedure for Redressal:

If you are working for our Company and in the course of your work, you have been sexually harassed by anyone through means which are mentioned in Item 3.0, we urge you to come forward with a written complaint as early as you can. Your complaint will be taken seriously and confidentiality would be maintained by us in the matter. We will have zero tolerance towards such practices once they are proven.

A complaint with respect to sexual harassment may be made by a written or electronic application addressed to Sri K. Karunakar Rao, Executive Director (F&C) [the Internal Complaints Committee, through the President / or to any member of the Internal Complaints Committee]. The Company may prescribe a format for filing complaints, which may be used by employees to make the process more efficient.

The Internal Complaints Committee may administer a declaration form to verify that the contents of the complaint are true and genuine, before it proceeds further with the complaint. Where necessary (for example, when the complaint is incomplete), the complainant may be contacted to provide further details in relation to the complaint to enable the Internal Complaints Committee to appreciate the situation more comprehensively.

The complaint must be given to the persons specified above within 3 months of the occurrence (the complaint can be made within 6 months if the person is able to prove that there were some exceptional circumstances due to which complaint could not be made earlier) and we advise you to be vigilant and keep any document with you which can be used to substantiate an allegation. The redressal system will work based on other evidence if you cannot produce any documentary evidence.

If the complainant cannot make a written complaint because of physical or mental incapacity or death, the legal heirs can make the complaint on her behalf.



An **Internal Complaints Committee** is constituted for our company by the management to look into the matters concerning sexual harassment. The Committee consists of following persons

At present the company is not having Women employees. Depending upon requirement in future the committee will be constituted with Women employee members. So also redressal mechanism will be formulated and implemented as and when required.

A complainant can approach any member of the committee with her written complaint.

The President and other members of the committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

Board approval	Date
Initial	29.05.2023

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For TGV SRAAC LIMITED

V. RADHAKRISHNA MURTHY C.G.M. And Company Secretary