

## **NEW AMBADI ESTATES PRIVATE LIMITED**

### **Policy on Prevention of Sexual Harassment and Safety of Women at Workplace**

#### **1) Objective**

- a) The objective of this policy is to create and maintain a safe, respectful, and dignified working environment free from sexual harassment, ensuring the safety and security of women at New Ambadi Estates (P) Ltd. This policy aligns with Indian laws and international conventions and applies to all employees, irrespective of gender, position, or location.

#### **2) Scope**

- a) This policy is applicable to all employees, contractual workers, trainees, interns, consultants, vendors, clients, or any other individual associated with the company. It applies to interactions within the workplace, including company premises, field locations, transportation provided by the company, online communication, and any event organized by or related to the company.

#### **3) Definition of Sexual Harassment**

- a) Sexual harassment includes any unwelcome act or behaviour (whether direct or indirect) that is sexual in nature, including but not limited to:
  - i) Physical contact and advances.
  - ii) A demand or request for sexual favours.
  - iii) Sexually coloured remarks.
  - iv) Showing pornography.
  - v) Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

#### **4) Forms of Sexual Harassment**

- a) Sexual harassment can take two forms:
  - i) **Quid Pro Quo Harassment:** Occurs when submission to or rejection of such conduct is used as a basis for employment decisions (promotion, salary increase, etc.).
  - ii) **Hostile Work Environment:** Occurs when the conduct creates an intimidating, hostile, or offensive work environment, unreasonably interfering with work performance.

#### **5) Applicable Laws and Conventions**

- a) This policy adheres to:
  - i) **The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013 ("POSH Act"):** A comprehensive law providing protection against sexual harassment at the workplace.
  - ii) **Indian Penal Code (IPC) Sections 354A, 354D, and others:** Relating to sexual harassment and stalking.
  - iii) **Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW):** International treaty to eliminate discrimination against women in all forms, ratified by India.
  - iv) **Universal Declaration of Human Rights (UDHR):** Ensuring dignity, respect, and equality for all individuals.



### **Internal Complaints Committee (ICC)**

- b) In compliance with the POSH Act, the company will constitute an Internal Complaints Committee (ICC) to address complaints related to sexual harassment. The ICC will consist of:
  - i) A senior woman employee as the Presiding Officer.
  - ii) At least two members with experience in social work, legal knowledge, or committed to women's causes.
  - iii) One external member from an NGO or an organization that is committed to women's rights.
- c) The ICC will have the authority to receive complaints, conduct investigations, and recommend actions.

### **6) Procedure for Filing Complaints**

- a) Any aggrieved woman can file a written complaint with the ICC within three months of the incident, extendable by another three months if there are valid reasons.
- b) The complaint should include details of the incident, parties involved, and any supporting evidence or witnesses.
- c) Anonymous complaints may be accepted for preliminary inquiry.

### **7) Redressal Procedure**

- a) Upon receiving the complaint, the ICC will initiate a confidential inquiry within a reasonable timeframe.
- b) The respondent will be provided with an opportunity to present their defence.
- c) The ICC will complete the investigation within 90 days and submit its report with findings and recommendations to the management.
- d) Actions may include written apology, warnings, reprimand, demotion, suspension, or termination depending on the severity of the violation.

### **8) False Complaints**

- a) While the company encourages employees to raise genuine complaints, it also recognizes that false or malicious complaints can be harmful. If it is determined after an inquiry that a complaint was made with malicious intent, the complainant may be subject to disciplinary action.

### **9) Confidentiality**

- a) The company recognizes the sensitive nature of sexual harassment cases. All complaints, inquiries, and proceedings shall be kept confidential, and details will not be disclosed to any unauthorized person unless required by law.

### **10) Awareness and Training**

- a) The company will organize workshops, awareness programs, and seminars on gender sensitivity, harassment prevention, and employees' rights and responsibilities at regular intervals.
- b) Mandatory POSH training will be provided to all employees at the time of joining and at regular intervals thereafter.

### **Employee Responsibilities**

- c) All employees are expected to behave professionally and uphold a culture of respect, dignity, and equality in the workplace.
- d) Employees must refrain from any form of sexual harassment and report any witnessed or experienced incidents promptly.

### **11) Employer's Responsibilities**

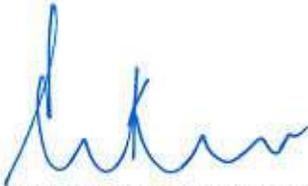
- a) The company is responsible for ensuring a safe and healthy working environment for all employees.
- b) Prompt and effective action will be taken against sexual harassment, including preventive measures, regular audits, and maintaining a zero-tolerance policy.
- c) Adequate infrastructure, including proper lighting and transportation for female employees, will be ensured for their safety, particularly in remote or estate locations.

### **12) Penalties for Non-Compliance**

- a) Non-compliance with this policy will be met with appropriate disciplinary actions.

### **13) Review of the Policy**

- a) This policy will be reviewed periodically to ensure its relevance and effectiveness, and necessary amendments will be made in accordance with changes in laws or workplace dynamics.



Signed By: **ARUN KUMAR**  
**CHIEF EXECUTIVE - PLANTATIONS**

Dated: 02.05.2024

**ISSUED ON – MAY 2024**

**VALID TILL - APRIL 2026**