



AUTOMOTIVE AXLES LIMITED

**POLICY FOR PREVENTION, PROHIBITION AND
REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE**

(Revised w.e.f. May 19, 2026)

AUTOMOTIVE AXLES LIMITED

Document Title	Policy for Prevention, Prohibition and Redressal of Sexual Harassment at Workplace
Current Revision Date	May 19, 2026
Authority approving the Policy	Board of Directors

**POLICY FOR PREVENTION, PROHIBITION AND
REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE**

1. PREAMBLE:

Sexual harassment at workplace is considered as violation of Women's right to equality, life and liberty. The Hon'ble Supreme Court in the case of Visaka and others vs State of Rajasthan 1997 AIR SC 3011 also reaffirmed that sexual harassment at workplace is a form of discrimination against women and recognized that it violates the constitutional right to equality and provided guidelines to address this issue pending the enactment of a suitable legislation.

Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 has come into force w.e.f 9.12.2013. The rules in the matter have been notified and come into force w.e.f 9.12.2013. Under section 19(b) of the Act it is obligatory for an employer to frame the policy for prevention of sexual harassment at the workplace and the procedure for dealing with the complaints arising from such Acts and display the same in a conspicuous place in the workplace. Accordingly, the policy has been framed and notified for the information of the employees.

2. OBJECTIVE

The company firmly believes that every employee has a right to work in an environment free from harassing, intimidating or offensive behavior and in which issues of harassment will be resolved without fear or reprisal. The Company also believes that all Employees of the Company have the right to be treated with dignity. committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment.

The policy is designed to take effective measures in accordance with the applicable law to avoid and to eliminate and if necessary to impose punishment for any sexual harassment.

The aforementioned laws only cover the sexual harassment against women. However, the company aims at treating every employee, irrespective of the gender, with dignity and respect. The company intends to promote a work environment that is conducive to the professional growth of its employees. Hence the company adopts and implements the Prevention, prohibition and redressal for Sexual Harassment at workplace (POSH) policy giving equal treatment to both women and male employees as an ideal employer.

3. POLICY STATEMENT:

Harassment at workplace in any form shall not be permitted or tolerated or condoned by the company whether it is based on a person's race, color, ethnic or national origin, gender, real or suspected sexual orientation, religion or perceived religious affiliation, disability or other personal characteristics. The use of company property including email, notice board or document as a vehicle for harassment is prohibited.

4. APPLICABILITY

This policy is known as policy for Prevention, Prohibition and Redressal of Sexual Harassment at Workplace & The Rules (hereinafter referred to as 'Policy') and is applicable to all employees (both male and female) of Automotive Axles Limited, Hootagalli Industrial Area, Off Hunsur Road, Mysore -570018 and its branches, deployed at the workplace who are either on the rolls of the establishment or engaged through the Contractor(s) having service agreement with the establishment or as enumerated in clause (f) of section 2 of the SHWW Act.

5. DEFINITIONS

In this Policy document, unless there is anything repugnant to the subject or context thereof, the words and expressions as stated below shall have the following meanings:-

- a. **Act** means Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules thereunder (SHWW Act)
- b. **Aggrieved Person** means in relation to a workplace, a person, of any age, who alleges to have been subjected to any act of sexual harassment by another person irrespective of gender or an employee or not;
- c. **Company** means Automotive Axles Limited, having its registered office at Hootagalli Industrial Area, Off Hunsur Road, MYSORE – 570 018, and its branches all over India.
- d. **Internal Committee (IC):** Constituted in accordance with the provisions of this policy read with SHWW Act and Rules thereunder.
- e. **Management** – Management means Company's Managing Director / Director / Manager or such other Officer or Officers / Nominee or nominees as may be authorized in this behalf by the Managing Director /Director and notified in the Notice Board of the establishment and also includes disciplinary authority and Appellate Authority as notified under the service rules or the certified standing orders as applicable.
- f. **Respondent** : Refers to any person against whom the complaint of sexual harassment has been lodged.
- g. **Workplace:** Workplace refers to all the offices of the company and includes departments, branches situated anywhere in India. It also includes any place visited by the employees arising out of or during the course of employment including transportation provided by the Management of the establishment for undertaking the journey, the places where the employees of the company have met for social, sports or extracurricular activities organized by the company or an accommodation provided by the Company for stay on account of business / official purposes including home offices where work from home is permitted by the Company.

The definition of "Workplace" expressly includes digital and virtual platforms used for work purposes, including but not limited to email, telephone, video conferencing tools (such as Zoom, Microsoft Teams, Google Meet), messaging applications, and any other online communication platform used in the course of employment.

6. MEANING OF SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR:

- a. **"Sexual Harassment"** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely;-
- (i) Physical contact and advances; or
 - (ii) A demand or request for sexual favors; or
 - (iii) Making sexually colored remarks; or
 - (iv) Showing pornography; or
 - (v) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- b. 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 :-
- (i) Implied or explicit promise of preferential treatment in her/his employment; or
 - (ii) Implied or explicit threat of detrimental treatment in her/his employment; or
 - (iii) Implied or explicit threat about her/his present or future employment status; or
 - (iv) Interference with her/his work or creating an intimidating or offensive or hostile work environment for her/his; or
 - (v) Humiliating treatment is likely to affect her/his health or safety.
- c. Sexual harassment should not be confused with simple friendly behavior or with more intimate exchanges if these are desired and accepted. The difference between the friendly behavior and sexual harassment is that sexual harassment is neither solicited nor accepted by the recipient, it is unwelcome or imposed.
- d. **Hostile Work Environment:** Hostile work Environment occurs when either speech or conduct of a sexual nature takes place and is seen or perceived as offensive and interferes with the work performance of the recipient, or any one or more employees.
- i. Hostile work environment may also include intimidating or harassing conduct that is directed at an individual, or a group of individuals.
 - ii. It will also mean related retaliation which includes marginalizing someone in the workplace with regard to his / her roles and responsibilities, socially ostracizing, intimidating someone physically, psychologically, and emotionally or someone close to or related to the victim
 - iii. This occurs where an employee is subjected to a pattern of unwanted and unwelcome sexual behavior from management or co-workers that creates an intimidating, offensive, oppressive, abusive, or humiliating work environment that is severe and pervasive enough to interfere with the employee's ability to work and perform.

- e. Quid Pro Quo Sexual Harassment: This occurs when consent to sexually explicit behavior or speech is made a condition for employment or preferential treatment in employment. It also occurs when refusal to comply with a request for sexual favors is met with retaliatory action such as dismissal, demotion, or creation of difficult working conditions.

7. CONSTITUTION OF INTERNAL COMMITTEE:

- a. The management shall constitute Internal Committee as per section 4 of the SHWW Act read with the rules thereunder.
- b. The members of the committee shall be constituted by the management consisting of the following;
 - i. A presiding officer who shall be a woman employed at a Senior level at workplace from among the employees.
 - ii. Not less than two members from amongst employees preferably committed to cause of the women or who had experience in social work or have a legal knowledge.
 - iii. One member from amongst non-governmental organization or association committed to the cause of women or a person familiar with the issues relating to sexual harassment.

or such number of people as may be required in accordance with the provisions of the SHWW Act, as amended, modified, or re-enacted from time to time.

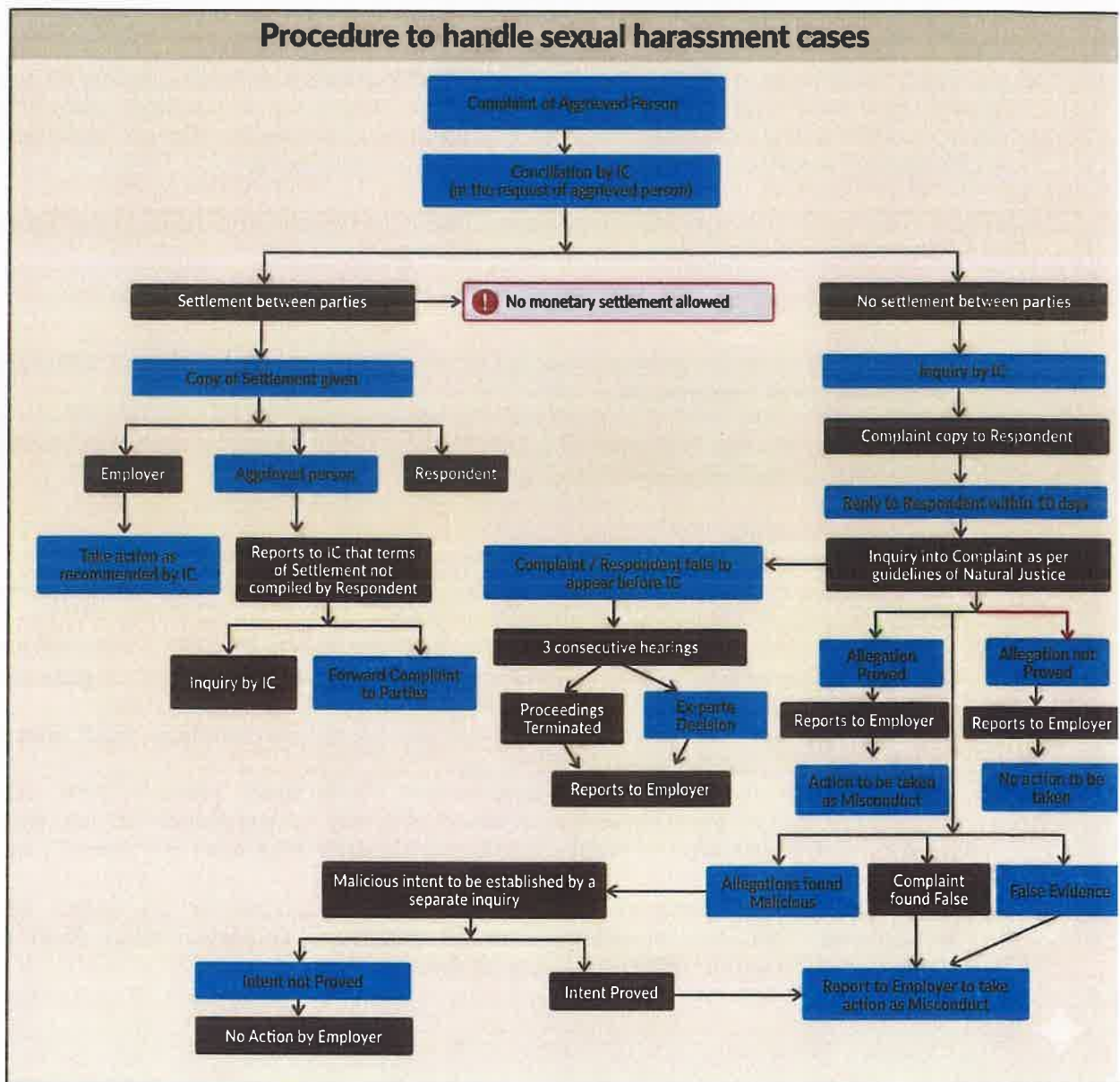
Provided further that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace.

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.

- c. The management shall decide the total members on the internal committee but shall ensure that at least one half of the total members so nominated shall be women.
- d. The management may appoint IC for each office and create a common group mail ID for all the units. i.e. posh@autoaxle.com. The group mail id will be single place for receiving the complaints under the POSH Policy which will be operated under the custody of Key IC members. In addition, the Company shall prominently display the members of the IC committee and the reporting mechanism on notice boards and the Company intranet. Anonymous complaints received through this channel shall be reviewed and appropriate action taken in accordance with the provisions of this Policy and applicable law.
- e. The committee as far as possible shall hold the proceedings in the office or in any other premises at the place in which the complainant is posted. However, committee, at its discretion and without causing avoidable inconvenience to the complainant may hold the proceedings at the corporate office of the company or any other place as decided by the committee.

- f. Every member of IC shall hold office for a period not exceeding 3 years from the date of their nomination as specified by the management or for such period of time as may be required in accordance with the provisions of the SHWW Act, as amended, modified, or re-enacted from time to time. The management may at their discretion re-appoint any member or the presiding officer for further terms having regard to his/her expertise and the experience gained by him/her while being associated with the committee.
- g. The names of members of the committee appointed from time to time shall be displayed for the information of the employees along with their designation, office of working and the group mail id.

8. FLOWCHART



9. FILING A COMPLAINT

- a. An aggrieved person shall make the complaint from the official id via email to posh@autoaxle.com. Wherever an aggrieved person is not able to send an email, such person will have a right to lodge a complaint concerning sexual harassment against herself/himself with the presiding officer of the committee.
- b. It is preferred that a complaint is backed by the supporting evidence. However, if there is no evidence available, the complaint may be filed without any supporting evidence, documents, etc.
- c. Such complaint shall be submitted within three (3) months from the occurrence of the incident. The Committee may for the reasons to be recorded in writing, extend the time limit up to three (3) months, if satisfied about the circumstances which led to delay in filing the complaint.
- d. An aggrieved person can also speak to any of the committee members, before filing a complaint if there is a need of help or assistance. Where such complaint cannot be made in writing, the Presiding Officer or any member of IC shall render all reasonable assistance to Aggrieved Person for making complaint in writing
- e. Where Aggrieved Person is unable to make complaint by reason of his / her physical incapacity the complaint may be filed by him/her:
 - i. Relatives or friends;
 - ii. Co-worker;
 - iii. In case of a Female Employee by an officer of the National Commission for Women or State Women Commission.
- f. Where Aggrieved Person is unable to make complaint by reason of his / her mental incapacity, the complaint may be filed by her/his:
 - i. Relatives or friends;
 - ii. A special educator; A qualified psychiatrist or a physiologist;
 - iii. The guardian or authority under whose care he/she's receiving the treatment or care;
 - iv. Any person who has the knowledge of the incident jointly with his / her relative; friend or a special educator or qualified psychiatrist or a physiologist, or guardian or authority under whose care he/she's receiving the treatment or care;
 - v. The Complainant and further proceedings relating to the complaint shall always be afforded full confidentiality at all stages.
 - vi. The Aggrieved Person and the Respondent, both shall present their case themselves before the Committee without any aid or assistance of any third person, be it in the form of family member, relative or otherwise any formal Legal assistance.
 - vii. Generally, the Company shall not, at any time, entertain or investigate any anonymous mail, correspondence; letters and such communication shall be ignored and no action will be taken or initiated.

10. RECEIPT AND ACKNOWLEDGEMENT OF THE COMPLAINT

A fair, prompt, and impartial inquiry process starts with the Internal Committee capable of creating an environment of trust and confidence throughout the inquiry. The complainant will be notified in writing to acknowledge the receipt of the complaint.

11. INQUIRY PROCEDURE AND PROCESS GUIDELINES

- a. Upon receipt of a written complaint, the Internal Committee shall review the complaint and:
 - i. If the complaint, prima-facie, do not meet and qualify for investigation under the provisions of this Policy, the Committee shall inform the complainant about the same and guide the Complainant to take up the issue with the Reporting Manager or HR Department for redressal.
 - ii. If the complaint, prima-facie, meets and qualify for investigation under the provisions of this Policy, the Committee shall initiate the necessary investigation proceedings.
- b. The IC shall ensure that the complainant has been informed about the process and the informal or formal options available for the redress upon receiving a complaint
- c. Upon receipt of the complaint from the Aggrieved Person, and if the Complaint qualify for investigation, the IC shall send a notice along with a copy of the complaint to the Respondent/s within seven (7) working days from the date of receipt of Complaint.
- d. The Respondent shall have to file his / her reply to the Complaint and send the reply to Internal Committee along with the list of documents, and names and addresses of the witnesses, within a period not exceeding ten (10) working days from date of receipt of the said Notice sent by IC.
- e. Internal Committee shall have the authority to terminate the inquiry proceedings or to give exparte decision on the complaint and send its recommendations to the concerned authority, if the Complainant or the Respondent fails, without sufficient cause, to present himself / herself for three (03) consecutive hearings convened by the Presiding Officer; provided such termination or the exparte may not be passed without giving 15 days advance notice to the Complainant or Respondent as the case may be.

12. INFORMAL PROCESS / COMPLAINT CONCILIATION

- a. The IC, before initiating a formal enquiry into the complaint of sexual harassment, in consultation and agreement of the Aggrieved person, shall explore enabling ways to address the complaint via conciliation.
- b. However, before recommending conciliation, the Committee must assess the severity of the situation and if necessary advise and enable the complainant to opt for the formal inquiry route.

- c. At no point, the Internal Committee will advise the complainant to resolve the matter directly with the respondent. Further, in no case monetary settlement be made basis of conciliation.
- d. Where such an informal process is successful, such resolution is to be recorded and forwarded the same to the employer for further action based on the resolution.
- e. Employers are responsible for taking steps to ensure that the complainant is not subject to any backlash and / or victimization.
- f. The choice of a formal process rests with the complainant even if IC believes that this can be resolved through an informal process.
- g. In case of settlement through conciliation, the IC shall record the said settlement and forward the same to Employer represented by Whole time Director to take action as specified in the recommendation with a copy to the Aggrieved Person and the Respondent.
- h. In case of closure by settlement no further inquiry shall be made by IC.
- i. In case it is informed by the Aggrieved Person that any of the terms or conditions of the settlement has not been complied by the Respondent then the IC may proceed to conduct the formal inquiry.
- j. However, in case both parties are Employees, they shall be given opportunity of being heard and making representation against the findings before the Committee. Further, if one of the parties happens to be not an Employee of the Company, then the parties may initiate necessary steps with appropriate authorities including filing a Police Complaint at the applicable jurisdiction Police Station.

13. FORMAL INQUIRY PROCESS OF COMPLAINT

- a. In case no settlement is arrived at between the Aggrieved Person and the Respondent, the IC shall, where the Respondent is an Employee, proceeds for inquiry into the complaint in accordance with the provisions of the Act and the Policy Guidelines of the Company.
- b. IC shall send a copy of the Complaint to the person against whom the complaint is made ("the respondent"). The copy of the complaint shall be sent within Seven (7) working days from the date of Aggrieved person opting for formal investigation or IC deciding for formal investigation based on the severity of the case.
- c. The respondent shall file the reply along with any evidence to substantiate his response within a period not exceeding ten (10) working days from the date of receipt of the copy of the complaint from the IC.
- d. As per the provisions of the Act, the Committee shall have the same powers as those vested with a Civil Court including:

- i. Summoning and enforcing attendance of any person and examining him on oath.
 - ii. Requiring the discovery or production of a document.
 - iii. Any other matter which may be prescribed.
- e. IC shall follow and adhere to the rules specified for the IC.
- f. The IC shall proceed with the enquiry in terms of the Act and the Rules made thereunder including Principles of Natural Justice.
- g. The proceedings of the investigation must have highest level of confidentiality and the members of the IC shall take appropriate measures to ensure that the proceedings or the deliberation therein or their findings are not disclosed until and unless the findings are accepted by the Management of the Company.

14. POSSIBLE DISCIPLINARY ACTION

In the event that the IC arrives at the conclusion that the allegation against the Respondent has been proved, possible disciplinary action will be in direct proportion to the seriousness of the offence. It could range from: –

- a. A letter of warning that will be placed in the personal file for an offence that is deemed minor by the IC such as offensive behavior that is verbal, graphic or through gesticulation.
- b. Immediate transfer or suspension without pay for a Complaint of harassment that is written or if more than one Complaint is lodged against a single person for a minor offence.
- c. Dismissal of the Respondent will be invited if the offence is serious enough such as in the case of emotional and physical harassment.
- d. When there are Complaints punishable under the Indian Penal Code, 1860, the Company shall take action in accordance with the Act and provide assistance to the Aggrieved Individual, if he/she so desires, to lodge the Complaint with the appropriate authority.
- e. Deduction from the salary or wages of the Respondent such sum as it may consider appropriate to be paid to the Aggrieved person or to his/ her legal heirs. In case the Company is unable to make deductions from the salary of the Respondent due to his being absent from duty or cessation of employment, it may direct the Respondent to pay such sum to the Complainant. In case the Respondent fails to pay the sum referred above, the POSH Committee may forward the order for recovery of the sum as an arrear of land revenue to the concerned district officer.
- f. The management shall take action on the recommendations of the IC within a period of sixty (60) days.

15. IMMEDIATE RELIEFS

- a. The IC at the request of the Aggrieved Person may recommend to the management:
 - i. To restrain the Respondent from reporting on the work performance of the aggrieved person or writing her confidential report and assign the same to another officer.
 - ii. To transfer the aggrieved person or the Respondent to any other workplace or
 - iii. Grant leave to the aggrieved person up to a reasonable period of time having regard to the severity of the complaint and the health and safety of the Aggrieved Person.
 - iv. Suspend the Respondent during the pendency of the inquiry, where the IC determines that continued presence of the Respondent in the workplace poses a risk to the safety or well-being of the Aggrieved Person or other employees. The payment for the suspension period will be as per the provisions of the Certified Standing Order of Automotive Axles Limited , Mysore and Model Standing Orders , as applicable for other locations.

16. OTHER FUNCTIONS OF THE INTERNAL COMMITTEE:

- a. The committee may meet periodically as per the legal requirement or within a period of such frequency as the IC may determine and review the measures taken by the company to suggest enhancing the measures taken by the company to prevent any type of harassment at workplace and recommend remedial measures.
- b. The internal committee shall submit its annual report as per the Act and the rules made thereunder.

17. ACTION ON THE REPORT OF THE IC:

- a. The Management shall initiate action on the report submitted by the IC.
- b. If the IC has held that charges against the Respondent have been proved the disciplinary action against the Respondent shall be in accordance with this policy. There is no need for ordering for a fresh inquiry. The Management shall examine the report and thereafter propose the punishment in accordance with the code of conduct or such other applicable policies/employment contract of the company. The management shall complete the disciplinary action against the employee within 60 days of the receipt of the recommendations of the IC.
- c. The Respondent shall have a right of appeal to the Appellate Authority in accordance with the act. The appeal shall be preferred within 90 days of the recommendations of the IC to the Management.

18. OBLIGATIONS OF THE MANAGEMENT:

- a. The management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of the policy.
- b. The management shall ensure that the IC will be reconstituted once the term of the existing committee is over. The management may consider re-appointing the members at its discretion. In cases if there are any complaints against any of the IC members the management shall take immediate steps to reconstitute the IC. The time limit specified under this policy shall be inclusive of the time taken for reconstituting the committee.
- c. The Management will monitor timely submission of reports. For this, the Management will conduct periodic update meetings with the IC to ensure that the said policy is being implemented in letter and spirit.
- d. The management shall provide assistance to the aggrieved person if she/he so chooses to file a complaint with the police in relation to the offence under the Indian Penal code or any other law for the time is being in force.
- e. The Management shall ensure that the annual report of the company includes the measures taken for ensuring the provisions of the SHWW Act are fully complied with and the complaints received under this policy and the action thereon.
- f. The Management will create awareness amongst employee on sexual harassment in the following manner:-
 - i. Training cum Awareness session for employees (men and women)
 - ii. Training cum Awareness session for IC members
 - iii. Training cum Awareness session for Human Resource teams and Senior Management.

19. CONFIDENTIALITY AND NON-DISCLOSURE:

- a. The identity and address of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the internal committee, the action taken by the employer shall be treated as confidential and shall not be disclose to anyone who is not authorized to receive the said information.
- b. The above restrictions shall be applicable to all the members of the internal committee and those who appear before the internal committee as witnesses and all those people who are entrusted with the duty to handle or deal with the complaint, inquiry or any recommendations. Any breach of confidentiality the person concerns shall be liable for the consequences as stipulated under Section 17 of the Act read with rule 12 of the rules.
- c. The provisions of the Right to Information Act are not applicable to the proceedings initiated under the Act in accordance with section 16 of the Act. Accordingly, no disclosure shall be made even if an application under RTI Act is made seeking any information with respect to the complaint or the proceedings or the action taken on the recommendation of the internal committee.

- d. The management may decimate regarding the justice secured to any victim of sexual harassment without disclosing the name, address, identity or other particulars calculated to lead to the identification of the aggrieved person and witnesses.

20. NON-RETALIATION:

The Company is committed to ensuring that no employee suffers any adverse consequence as a result of reporting, in good faith, a complaint of sexual harassment or participating in any proceeding under this Policy. Retaliation against any person who has made a complaint, provided testimony as a witness, or participated in any inquiry under this Policy is strictly prohibited and shall itself constitute a separate and serious violation of this Policy, subject to disciplinary action.

Retaliation includes, but is not limited to, termination, demotion, denial of promotion, transfer, harassment, exclusion, or any other act that adversely affects the employment or working conditions of the person making the complaint or participating in the inquiry. Any employee who believes they have been subjected to retaliation may report such retaliation to the IC or Management, and the matter shall be investigated and addressed in accordance with the disciplinary procedures of the Company.

An employee does not need to be proven correct in their complaint to receive protection under this clause, but must have acted in good faith and provided truthful and accurate information to the best of their knowledge

21. TIMELINE FOR ACTIVITIES UNDER THE POLICY:

SL.No	ACTION POINT	AUTHORITY/CONCERNED PERSON	TIME LIMIT
1	Complaint:	Complaint to be lodged by aggrieved person Before Internal Complaints Committee	1) within the period of 3 months from the date of the incident, or 2)in case of series of incidents, within the period of 3 months from the date of last incident.
2	Initiation of Inquiry Proceedings	By the Internal Complaints Committee, by sending the copy of complaint to the Respondent	Within 7 working days of receipt of the complaint
3	Reply by the Respondent along with his list of documents, names and addresses of witnesses	To the Internal Complaints Committee	Within 10 working days from the day of receipt of the copy of complaint forwarded by IC.
4	Completion of Inquiry proceedings	By IC	Within 90 days from the date of receipt of complaint

5	Submission of Inquiry Report and Findings along with Recommendations by IC	To the Management	Within 10 days of completion of Inquiry proceedings by IC
6	Implementation of Recommendations made in the Inquiry Report of IC	By the Management	Within 60 days of the receipt of the Recommendations made in the Inquiry Report by IC
7	Appeal under clause 11.3 of the policy.	By the aggrieved person	Within a period of 90 days of Recommendations by IC.

22. PUNISHMENT FOR FALSE OR MALICIOUS COMPLAINT AND FALSE EVIDENCE.

Where the Internal Committee, as the case may be, arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved person or any other person making the complaint has made the complaint knowing it to be false or the aggrieved person or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer, as the case may be, to take action against the woman or the person who has made the complaint under sub-section (1) or sub-section (2) of section 9, as the case may be, in accordance with the provisions of the service rules applicable to her or him or where no such service rules exist, in such manner as may be prescribed:

Note: Mere inability to substantiate a complaint or provide adequate proof need not attract action against complainant under this section.

23. AMENDMENT

The power to amend this policy shall be with the Board of Directors.

Date: 19.05.2026
Place: Pune


Nagaraja Gargeshwari
President & Wholetime Director