

Purpose and Scope of this document

To define the standard procedure for the prohibition, prevention, and redressal of sexual harassment at the workplace, ensuring a safe and respectful work environment.

SCOPE:

Applicable to all Employees, Contractors, Trainees/Interns, and third-party associates of Plansee India High Performance Materials Private Limited

Responsibility

Role	Responsibility
HR Lead/Manager	Lead awareness, training, and implementation of POSH policy. Ensure ICC is functional, and complaints are addressed.
Internal Complaints Committee (ICC)	Investigate and resolve complaints as per the POSH Act. Maintain confidentiality and follow principles of natural justice.
Employees	Comply with the policy, report incidents, and cooperate during investigations.

POLICY

for

PROHIBITION, PREVENTION & REDRESSAL

of

SEXUAL HARASSMENT AT THE WORKPLACE

Content

1. OBJECTIVE	Error! Bookmark not defined.
2 PROHIBITION OF SEXUAL HARASSMENT.....	2
3. PREVENTION OF SEXUAL HARASSMENT.....	3
4. REDRESSAL OF COMPLAINTS.....	4
5. PUNISHMENT FOR SEXUAL HARASSMENT.....	4
6. CONSEQUENCES OF MAKING FALSE OR MALICIOUS COMPLAINTS.....	5
7. CONFIDENTIALITY.....	5
8. AMENDMENTS.....	6

APPENDIX A: INTERNAL COMPLAINTS COMMITTEE DETAILS**APPENDIX B: GRIEVANCE REDRESSAL PROCESS**

Terms, definitions, abbreviation.....	6
Referenced documents.....	6
Changes to last version(s).....	6

This policy is the Company’s policy against sexual harassment (“Policy”). This Policy extends to all staff of the Company. This Policy supersedes and replaces all prior policies and procedures of the Company in relation the prohibition and prevention of sexual harassment at the workplace.

1 Objective

- Sexual Harassment violates an individual’s dignity and may have significant adverse effects on the harassed individual, her/his family, colleagues and the entire organization.
- **Plansee India High Performance Materials Private Limited (the “Company”)** is an equal employment opportunity employer and is committed to creating a safe and healthy working environment that enables individuals to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all individuals of the Company and persons who deal with the Company, have the right to be treated with dignity.

PROHIBITION OF SEXUAL HARASSMENT

(A) The Company strictly prohibits Sexual Harassment of any individual in its Work Environment, regardless of form or whether it is explicit or implied.

(B) “Sexual Harassment” means:

- (i) any conduct or behaviour that is unwelcome and sexual in nature.**

A few examples of such conduct are:

- (a) physical contact and advances.
- (b) a demand or request for sexual favours.
- (c) making sexually colored remarks.
- (d) showing pornography.

- (ii) any conduct, behaviour or circumstance that is harassing in nature and supports one’s own or another person’s unwelcome conduct or behaviour of a sexual nature.**

A few examples of such conduct/behaviour/circumstances are:

- (a) Retaliating in any manner, for complaining against Sexual Harassment or giving evidence in support of such a complaint.

- (b) Promising preferential treatment in employment.
- (c) Threatening detrimental treatment in employment.
- (d) Threatening to adversely affect a person's present or future employment status.
- (e) Creating circumstances that interfere with a person's work.
- (f) Creating an intimidating or offensive or hostile work environment.
- (g) Subjecting a person to humiliating treatment that affects her/his health or safety.

Any conduct or behaviour that falls within the meanings defined in B(i) or (ii) above, will be deemed to be Sexual Harassment, whether it is implied or explicit and whether it is physical, verbal, non-verbal or in any other form. The examples listed above are only illustrative in nature and do not limit the above definitions B(i) and B(ii) in any manner.

(C) **“Work Environment”** means:

- (i) Interactions amongst the Company's staff, irrespective of location and timing.
- (ii) Interactions between the Company's staff and a third party during the course of employment or third party's business relationship with the Company.
- (iii) Interactions between any staff member of the Company/third party having a business relationship with the Company and a visitor to the Company's premises/events.

*The term “staff” includes full-time and part-time, permanent as well as temporary/contract employees, individual consultants and trainees (paid as well as unpaid).

- (D) In determining whether certain conduct/ behaviour is unwelcome, the alleged victim's reasonable perception of how she/he felt as a result of such conduct/behaviour will have greater relevance than the alleged harasser's intentions.

PREVENTION OF SEXUAL HARASSMENT

- (A) The Company believes that Sexual Harassment can and must be eliminated through awareness. The HR Department of the Company will take overall lead in creating awareness about the Policy and take the necessary actions as and when required to govern the Policy.
- (B) The Company will spread awareness within its organization through periodic communications about Sexual Harassment and its consequences for the organization and the individuals involved.
- (C) The Company will also take other appropriate steps as may be required to prevent and eliminate Sexual Harassment from its Work Environment.

REDRESSAL OF COMPLAINTS

- (A) The Company has constituted Internal Complaints Committees (“**ICC**”) to investigate and decide complaints of Sexual Harassment made against its staff.
- (B) The names and contact details of the ICC members are provided in Appendix A to this Policy.
- (C) Anyone who faces or is affected by Sexual Harassment in the Company’s Work Environment may make a complaint to the respective ICC. The ICC will provide assistance in making the complaint as may be required. The ICC may also require the Company to implement measures to protect the complainant, alleged victim and witnesses against any retaliation or to maintain a safe and healthy working environment while the complaint is pending.
- (D) The procedures and time frames for filing, investigating and deciding complaints; and rights and obligations of the parties involved in the complaint are detailed in the Grievance Redressal Process (see Appendix B to this Policy).
- (E) If the ICC requires you to attend an inquiry hearing or to cooperate for the purposes of inquiring into a complaint, it is mandatory for you to attend and/or cooperate as requested.
- (F) When enquiring into a complaint the ICC will observe the principles of natural justice and give both sides an opportunity to present their case.
- (G) Where a woman has complained of sexual harassment and either party is unhappy with the ICC’s decision or if the complainant is unhappy with the action taken against the harasser, they may appeal to the appropriate appellate authority appointed by the government within 90 days from the date of the ICC’s decision. The presiding officer of the ICC and/or any person so authorized by the Company will provide information on the appropriate authority at the relevant time.

PUNISHMENT FOR SEXUAL HARASSMENT

- (A) The Company shall act as recommended by the ICC against any employee who is found guilty of Sexual Harassment after due inquiry by the ICC. Such action may include one or more of the following:
 - 1. a warning.
 - 2. a written apology.
 - 3. mandatory counselling sessions or community service.
 - 4. fine of an amount as decided by the ICC.

5. withholding of promotions or increments.
6. suspension from service.
7. termination of service.

(B) Any person who is found guilty of Sexual Harassment of a woman after due inquiry by the ICC shall also be liable to pay compensation to the woman as may be decided by the ICC in accordance with the law.

(C) The following acts of Sexual Harassment are also criminal offences under the Indian Penal Code and are punishable as described below:

1. physical contact and advances involving unwelcome and explicit sexual overtures.
2. a demand or request for sexual favours.
3. showing pornography against the will of a woman.
4. making sexually coloured remarks.

The offences under points C (1), (2) and (3) are punishable with rigorous imprisonment of up to 3 years and a fine of an amount as may be decided by a court. The offence under point C (4) is punishable with simple or rigorous imprisonment of up to 1 year and/or a fine of an amount as may be decided by a court.

CONSEQUENCES OF MAKING FALSE OR MALICIOUS COMPLAINTS

- If the ICC concludes that a complaint is intentionally false or malicious or that any person has intentionally provided false or misleading evidence of any kind, the person who knowingly made such a false or malicious complaint or knowingly provided such false or misleading evidence may be punished in the same manner as described in Para 5 (A) and (B) above. A complaint will not automatically be treated as false or malicious just because of failure to prove that Sexual Harassment occurred.

CONFIDENTIALITY

- Privacy and dignity of individuals must be respected and matters of Sexual Harassment must be treated with great sensitivity. Therefore, all information pertaining to any complaints of Sexual Harassment should be treated as private and confidential and should not be disclosed to anyone other than the ICC or the parties involved in the complaint and, to a limited extent, only to those persons strictly on a “need to know” basis and who are expected to implement the decisions of the ICC. Anyone breaching this obligation of confidentiality shall be liable to

**PREVENTION OF SEXUAL HARASSMENT AT
WORKPLACE**

pay the Company a fine of Rupees Five Thousand (Rs. 5000) and may also be punished as per recommendations of the ICC.

AMENDMENTS

- The Company may amend this Policy and the related Appendices from time to time to reflect any changes in the applicable laws or even otherwise to ensure that its work environment is free from Sexual Harassment

APPENDIX A**Details of ICC**

Location of Office: Mysore

Name	Role	Email	Phone / Ext.	Date of Appointment
Mrs. Shobha	Presiding Officer	shobha.nagaraju@plansee-irroup.com	410	March 29, 2025
Mr. Ramadeep Singh	Member	ramandeep.singh@plansee.com	427	March 29, 2025
Mr. Basavaraj Angadi	Member	basavaraj.angadi@plansee.com	403	March 29, 2025
Mrs. Sumathi Channappa	Member	sumathi.channappa2@plansee.com	513	March 29, 2025
Mr. Nagendra Rao	Member	nagendra.rao@plansee.com	417	March 29, 2025
Mrs. Divya.K. S	Member	Divya.suresh@plansee.com	402	October 11, 2025
Mrs. Divya Manoj	Member	divya.manoj@plansee.com	428	March 29, 2025
Mrs. Harinie Seenivasan	External Member	harinie.seenivasan@btgadvaya.com	9442790120	July 18, 2024

Terms, definitions, abbreviation

- Nil

Referenced documents

- Nil

Changes to last version(s)

Vs	Valid from	Replacing	Prepared	Released	Reason for change / Change description
00	12-03-2021	NA	See SAP-DMS	See SAP-DMS	▪ Initial Release
01	31-01-2024	00	See SAP-DMS	See SAP-DMS	▪ Committee Members have been changed
02	28-10-2025	01	See SAP-DMS	See SAP-DMS	▪ Procedure Updated

PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE



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7 / 7

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