



**POLICY ON
PREVENTION OF
SEXUAL HARASSMENT
AT WORKPLACE**

Table of Contents

Sr. No.	Particulars	Page Number
1.	COMMITMENT:	1
2.	Applicability of this Policy:	1
3.	SCOPE:	2
4.	DEFINITION OF SEXUAL HARASSMENT:	2
5.	Other definitions:	3
6.	Company's Approach to Sexual Harassment Issues:	5
7.	Complaints Handling Process:	5
8.	Constitution of Internal Complaints Committee (ICC):	6
9.	Process for Dealing with Incidents of Sexual Harassment:	7
10.	False or Malicious Complaints:	9
11.	FLOWCHART: PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT	10
12.	Training, Awareness, and Reporting Obligations:	13
13.	Version History:	13

COMMITMENT:

Maxwell Engineering Solutions Limited [‘the Company’] is committed to fostering a safe, inclusive, and respectful workplace where every individual is treated with dignity and afforded equal opportunity for growth. The Company upholds the principles of fairness, equity, and mutual respect, and seeks to create an environment that supports the professional and personal well-being of all its employees.

In line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder, the Company adopts a zero-tolerance approach to any form of sexual harassment. This Policy on Prevention of Sexual harassment at workplace [‘Policy’] aims to ensure that the workplace is free from any unwelcome behaviour—physical, verbal, written, or visual—of a sexual nature that may interfere with an individual’s work performance or create an intimidating or offensive work environment.

The Company is committed to taking all necessary steps to prevent incidents of sexual harassment, to promote awareness, and to provide an effective mechanism for redressal of complaints.

Through this Policy, the Company affirms its unwavering commitment to uphold the dignity and safety of every individual and to maintain a work culture where mutual trust and ethical conduct are paramount.

Applicability of this Policy:

This Policy is applicable to all individuals associated with the Company and shall cover:

- All Employees of the Company, including but not limited to those who are permanent, probationary, temporary, part-time, contractual, trainees, or interns, irrespective of their designation or nature of employment.
- Third parties who interact with the Company or are present at its premises, including customers, vendors, consultants, service providers, contractors, visitors, or any other individual engaged with the Company in any capacity.
- All workplaces of the Company, whether located within or outside its physical premises, including off-site locations, project sites, client locations, company-organized events, virtual meetings, and any place visited by employees in the course of official duties.

This is a gender-neutral Policy, and it applies equally to all persons, irrespective of gender, gender identity, or sexual orientation.

SCOPE:

This Policy extends to all locations, events, and contexts where the Company operates or where its employees may be present in connection with their employment.

This Policy also supports the Company's efforts to ensure:

- A professional work environment that promotes equality and prohibits sexual harassment.
- A defined and effective grievance redressal process that is fair, confidential, and sensitive to the needs of all parties involved.
- Protection from retaliation or victimization for those who raise concerns or complaints in good faith.
- Promotion of responsible and respectful behaviour at all times within the work environment and beyond, wherever business responsibilities are carried out.

This Policy shall apply across all levels and categories of employees and associated persons, and shall also extend to interactions involving clients, vendors, contractors, consultants, service providers, and any other person associated with the Company in a professional capacity.

DEFINITION OF SEXUAL HARASSMENT:

Sexual Harassment constitutes any unwelcome act or behaviour, whether direct or implied, physical, verbal, written, or non-verbal, that is sexual in nature and occurs in a work-related context. It may be a single incident or a pattern of behaviour and includes conduct that creates an environment which is hostile, intimidating, humiliating, or offensive to the aggrieved person.

Sexual harassment at the workplace may include, but is not limited to, the following:

- Unwelcome sexual advances, gestures, or physical contact;
- Requests or demands for sexual favours, whether implicit or explicit;

- Making sexually coloured remarks, jokes, or innuendos;
- Displaying, circulating, or sharing obscene or pornographic content;
- Sending inappropriate messages or content via email, chat, or social media;
- Any act implying that sexual compliance will result in employment-related benefits or refusal will lead to adverse consequences;
- Creating a hostile or offensive work environment through gender-based discrimination, intimidation, or ridicule.

It is important to note that:

- Sexual harassment is not limited by intent; even if the conduct was not intended to offend, its impact on the recipient is what determines whether it qualifies as harassment.
- This is an inclusive and gender-neutral definition, applicable to all employees, irrespective of gender, sexual orientation, identity, or hierarchy.
- This is only an indicative list of the possible acts and in no way is exhaustive in nature; any behaviour of a sexual nature that is unwelcome and affects an individual's dignity at the workplace may amount to sexual harassment.

Other definitions:

“Aggrieved woman” in relation to a workplace means—

a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent. This would imply that the term extends to people who may be visitors or guests at the workplace.

“Complainant” means an individual who raises or files a complaint of sexual harassment under this Policy.

“Domestic worker” means a woman who is employed to do the household work in any household for remuneration whether in cash or kind, either directly or through any agency on a temporary, permanent, part time or full time basis, but does not include any member of the family of the employer.

“employee” means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer,

whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

“employer” in relation to a workplace means—

any person responsible for the management, supervision and control of the workplace including the person discharging contractual obligations with respect to his or her employees.

Explanation—For the purposes of this sub-clause “management” includes the person or board or committee responsible for formulation and administration of policies for such organisation;

“Internal Committee” means an Internal Complaints Committee constituted in compliance with the Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 [“the Act”].

“Premises” shall include but not be limited to:

- i. All offices, factories, branches, manufacturing units, and other official locations where the Company conducts its business;
- ii. Any external location visited by an employee or associated person in connection with or during the course of employment or engagement with the Company, including but not limited to client locations, vendor sites, industry events, exhibitions, seminars, conferences, guest houses, or hotels;
- iii. Any mode of transport provided, arranged, or reimbursed by the Company (or its representatives) for commuting to and from the above-mentioned locations or for work-related travel;
- iv. Virtual environments such as video conferences, work-related group chats, emails, or other online modes of communication used for official purposes; and
- v. Social, business, or informal gatherings connected to or arising from the employment context, where the conduct of individuals may have an impact on workplace relations.

“Presiding Officer” means the Presiding Officer of the Internal Complaints Committee nominated under sub-section (2) of section 4 of the Act.

“respondent” means a person against whom the aggrieved woman has made a complaint under Section 9.

Company's Approach to Sexual Harassment Issues:

The Company recognizes that any form of sexual harassment at the workplace is a serious violation of personal dignity and professional ethics. Accordingly, the Company follows a strict, structured, and fair approach in addressing such matters, ensuring that all concerns are dealt with promptly, impartially, and confidentially.

Every complaint of sexual harassment—irrespective of the nature or rank of the persons involved—shall be thoroughly examined by the Internal Committee constituted under this Policy. The Committee shall assess the merits of each case independently, taking into account the specific facts and circumstances, including but not limited to the presence of the following elements:

- Implied or explicit promise of preferential treatment in employment;
- Implied or explicit threat of adverse or detrimental treatment in employment;
- Threats affecting the complainant's current or future employment status;
- Conduct that interferes with the complainant's work or creates a hostile, offensive, or intimidating work environment;
- Humiliating treatment likely to affect the complainant's health, safety, or mental well-being.

While these are indicative factors, the Committee retains discretion to evaluate any other aspect relevant to the situation. If the complaint is established after due process, the Company shall initiate appropriate disciplinary action, which may include written warnings, suspension, termination, or any other action in accordance with applicable laws and internal policies.

The Company ensures non-retaliation against complainants or witnesses acting in good faith and affirms its responsibility to preserve the integrity of the process through sensitivity, fairness, and transparency at all stages.

Complaints Handling Process:

The Company has adopted a formal and structured approach for dealing with complaints of sexual harassment. This process ensures that every complaint is

handled with fairness, sensitivity, and in strict adherence to the provisions of the Act.

Constitution of Internal Complaints Committee (ICC):

At all regional offices, units, and project sites of the Company, an Internal Complaints Committee [‘ICC’] shall be constituted to address complaints of sexual harassment. The constitution of the ICC shall strictly adhere to the provisions laid down under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The Committee will be constituted in accordance with the following guidelines:

Presiding Officer – One (1) Member:

A senior-level woman associate shall be appointed as the Presiding Officer of the Committee. In the event that a senior woman associate is not available at the specific location, a suitable woman employee may be nominated from another administrative office or unit of the Company.

Employee Members (Associates) – Two (2) or more Members:

Employees who are committed to the cause of women or possess experience in social work or legal matters shall be nominated to serve as members of the Committee. At least one of the members shall be a representative from the Human Resources function or a person nominated by HR for that particular location.

External Member (NGO/Association Representative) – One (1) Member

An individual from a recognized non-governmental organization (NGO) or an association committed to the cause of women, or a person well-versed in issues relating to sexual harassment, shall be nominated as an external member of the Committee.

- *At least 50% of the members of this Committee are women, in compliance with the Section 4(2) of the Act.*
- *The ICC shall be reconstituted in case of transfer, resignation, or completion of tenure of any member, or as and when required.*
- *The constitution of the Committee for each location will be announced separately.*

Process for Dealing with Incidents of Sexual Harassment:

1. Filing of Complaint:

Any aggrieved person who experiences sexual harassment at the workplace may submit a complaint in writing to the Internal Complaints Committee (ICC) within three months from the date of the incident. In case of a series of incidents, the complaint should be filed within three months from the date of the last incident.

If the complainant is unable to submit a written complaint due to physical or mental incapacity, or in the event of death, their legal heir or authorised representative may submit the complaint on their behalf.

The ICC may extend the time for filing the complaint by up to an additional three months if it is satisfied that the delay was due to valid reasons.

2. Conciliation Process:

Before initiating a formal inquiry, and only at the request of the complainant, the ICC may attempt to resolve the matter through conciliation.

No monetary settlement shall be made as a basis of conciliation.

If conciliation is successful, the ICC shall record the terms of settlement and forward them to the employer for implementation. Copies of the settlement shall also be given to both parties.

No further inquiry shall be conducted if a settlement has been reached, unless the terms of the settlement have not been complied with.

3. Inquiry into Complaint:

If no conciliation is requested or the settlement is breached, the ICC shall initiate a formal inquiry into the complaint, adhering to the principles of natural justice.

The inquiry must be completed within 90 days from the date of receipt of the complaint.

Both the complainant and the respondent shall be given an opportunity to present their case, submit evidence, and respond to findings.

The minimum quorum for conducting an inquiry shall be three members of the ICC, including the Presiding Officer.

Upon completion of the inquiry, a detailed report of findings shall be prepared and shared with both parties.

4. Recommendations and Action:

Within 10 days of concluding the inquiry, the ICC shall submit its findings and recommendations to the employer.

If the allegations are not proved, the ICC will recommend no action.

If the allegations are established, the ICC may recommend:

- Disciplinary action in accordance with the Company's service rules.
- Deduction from the salary or wages of the respondent to be paid as compensation to the complainant, as per Section 15 of the Act.
- If salary deduction is not possible (due to resignation or absence), the ICC may direct the respondent to pay the amount directly or recommend recovery as an arrear of land revenue.

The employer is required to implement the ICC's recommendations within 60 days of receiving the report.

5. Interim Relief During Inquiry:

Upon a written request by the complainant, and during the pendency of the inquiry, the ICC may recommend to the employer:

- Transfer of the complainant or the respondent to another location or department;
- Grant of leave up to three months to the complainant (in addition to regular entitlement);
- Restraining the respondent from supervising or assessing the complainant's work;
- Any other relief deemed appropriate.

6. Appeal Mechanism:

An appeal against the ICC's recommendations may be filed by either party before

a court or tribunal, in accordance with the Company's service rules or the applicable legal provisions, within 90 days of the recommendations.

7. Confidentiality:

The Company and the ICC shall maintain strict confidentiality throughout the complaint and inquiry process.

No information about the complaint, identity of the parties, witnesses, or proceedings shall be published, communicated, or made known to the public, press, or media.

Disclosure, if any, shall be limited to reporting statutory compliance without compromising the privacy of the individuals involved.

8. Invocation of Indian Penal Code and Other Laws:

In instances where an act of sexual harassment also constitutes an offence under the Indian Penal Code (IPC) [now Bharatiya Nyaya Sanhita (BNS)] or any other applicable law, the Company is committed to assisting the aggrieved person.

If the complainant desires to file a police complaint, the Company shall provide all necessary assistance.

The Company shall also initiate action under the IPC or any other applicable law against the perpetrator, or, if the aggrieved woman so desires and the perpetrator is not an employee, at the workplace where the incident occurred.

This commitment extends to cooperating for legal redressal in cases involving third-party offenders (such as clients or vendors) at the location where the harassment took place.

False or Malicious Complaints:

The Company views false or malicious complaints of sexual harassment with serious concern, as they undermine the integrity of the redressal mechanism and the principles of natural justice.

If, after a thorough inquiry, the ICC concludes that an allegation against the respondent is malicious, or that the complainant (or any other person making the complaint) knowingly made a false complaint or produced forged or misleading documents, the ICC may recommend disciplinary action against such complainant or person.

Such action will be taken in accordance with the Company's service rules or in a prescribed manner where no such rules exist.

It is crucial to note that a mere inability to substantiate a complaint or provide adequate proof will not automatically lead to action against the complainant under this section.

Malicious intent on the part of the complainant must be clearly established after an inquiry conducted in accordance with the prescribed procedure before any disciplinary action is recommended.

Similarly, if during an inquiry, any witness is found to have given false evidence or produced forged or misleading documents, the ICC may recommend disciplinary action against that witness as per applicable service rules or in a prescribed manner.

FLOWCHART: PROCESS FOR DEALING WITH INCIDENTS OF SEXUAL HARASSMENT

Incident Occurs:

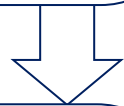
Alleged act of sexual harassment takes place at workplace or connected location.

Filing of Complaint:

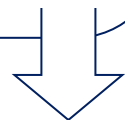
- Any aggrieved person who experiences sexual harassment at the workplace may submit a complaint in writing to the Internal Complaints Committee (ICC) within three months from the date of the incident.
- In case of a series of incidents, the complaint should be filed within three months from the date of the last incident.
- The ICC may extend the time for filing the complaint by up to an additional three months if it is satisfied that the delay was due to valid reasons.
- If the complainant is unable to submit a written complaint due to physical or mental incapacity, or in the event of death, their legal heir or authorised representative may submit the complaint on their behalf.

Optional Conciliation (Only if requested by complainant)

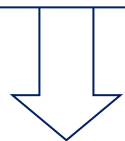
- Before initiating a formal inquiry, and only at the request of the complainant, the ICC may attempt to resolve the matter through conciliation.
- No monetary settlement shall be made as a basis of conciliation.
- If conciliation is successful, the ICC shall record the terms of settlement and forward them to the employer for implementation. Copies of the settlement shall also be given to both parties.
- No further inquiry shall be conducted if a settlement has been reached, unless the terms of the settlement have not been complied with.

**Formal Inquiry Initiated**

- If no conciliation is requested or the settlement is breached, the ICC shall initiate a formal inquiry into the complaint, adhering to the principles of natural justice.
- Both the complainant and the respondent shall be given an opportunity to present their case, submit evidence, and respond to findings.
- The inquiry must be completed within 90 days from the date of receipt of the complaint.
- The minimum quorum for conducting an inquiry shall be three members of the ICC, including the Presiding Officer.

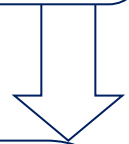
**Findings and Report**

- Upon completion of the inquiry, a detailed report of findings shall be prepared and shared with both parties.
- Within 10 days of concluding the inquiry, the ICC shall submit its findings and recommendations to the employer.



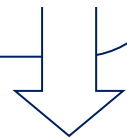
Employer Action

The employer is required to implement the ICC's recommendations within 60 days of receiving the report.

**Relief or Disciplinary Action**

Interim Relief: Upon a written request by the complainant, and during the pendency of the inquiry, the ICC may recommend to the employer: transfer of the complainant or the respondent to another location or department; grant of leave up to three months to the complainant (in addition to regular entitlement); restraining the respondent from supervising or assessing the complainant's work; or any other relief deemed appropriate.

Disciplinary Action or Compensation: If the allegations are established, the ICC may recommend disciplinary action in accordance with the Company's service rules, or deduction from the salary or wages of the respondent to be paid as compensation to the complainant (as per Section 15 of the Act). If salary deduction is not possible, the ICC may direct the respondent to pay the amount directly or recommend recovery as an arrear of land revenue. If the allegations are not proved, the ICC will recommend no action.

**Appeal**

An appeal against the ICC's recommendations may be filed by either party before a court or tribunal, in accordance with the Company's service rules or the applicable legal provisions, within 90 days of the recommendations.

Training, Awareness, and Reporting Obligations:

The Company shall conduct regular awareness sessions, orientation workshops, and sensitization programs for employees and ICC members.

The ICC shall prepare and submit an Annual Report in accordance with Section 21 of the Act, including:

- Number of complaints received, resolved, or pending;
- Number of cases exceeding 90-day timelines;
- Nature of actions taken;
- Number of awareness programs conducted.

An HR representative will be nominated in the Committee. The Annual Report shall be submitted to the Managing Director and to the District Officer notified under the Act.

Version History:

Sr. No.	Version	Created by	Approved By	Approval Date
1.	1.0	Secretarial	Board of Directors	July 26, 2025.

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