



## **Policy for Prevention of Sexual Harassment at Workplace**

*[Effective Date: 26.03.2015 Last Amended Date: 10.05.2025]*

### **1. PREFACE**

High Energy Batteries (India) Limited ("HEB" or "the Company") is committed to creating a cordial, safe and healthy working environment free from harassment of any kind and in particular, an environment that has zero tolerance for sexual harassment.

Our Company strives to provide an environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.

We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers and ensure that they maintain mutual respect and dignity towards one another.

### **2. PURPOSE**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this Policy. They are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

### **3. APPLICABILITY**

This policy applies to all categories of employees within the meaning of Section 2(6) of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013. All terms used herein shall have the meaning as defined in the Act and the same was put in place to protect the larger interests of women who are victims of sexual harassment at all workplaces, whether public or private. This will contribute to realization

of their right to gender equality, life and liberty and equality in working conditions everywhere.

The Management reserves the right to review and revise the Policy at its sole discretion, as and when the circumstances warrant.

#### **4. DEFINITION**

Sexual Harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favors, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- Unwelcome sexual advances ( verbal, written or physical),
- Demand or request for sexual favors,
- any other type of sexually – oriented conduct,
- verbal abuse or ‘joking’ that is sex-oriented,
- showing pornography,
- any other unwelcome physical, verbal, or non-verbal conduct of sexual nature.

The words “any other unwelcome physical, verbal or non-verbal conduct of sexual nature” mentioned above, may include but not limited to the following:

- Demand for sexual favors accompanied by implied or over threats concerning one’s job, grade or letter or recommendation,
- Subtle comments for sexual activity,
- Sexual comments and innuendos,
- Visual display of degrading sexual images,
- Physical assault, rape and sodomy.

## **5. OBJECTIVES**

This policy mandates that HR Department is responsible for giving wide publicity and display of the Guidelines prominently in workplace and verify the effectiveness of the Guidelines. They are also responsible to suggest revisions wherever required, based on the ground realities and past experience.

## **6. POLICY DETAILS & PROCEDURES**

### **6.1. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT**

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

### **6.2. ADMINISTRATIVE GUIDELINES**

#### **A. Complaint mechanism:**

For time-bound redressal of the complaint made by victim, a Sexual Harassment Complaints Committee is created in the Company whether or not such conduct constitutes an offence under law or a breach of the Service rules.

#### **B. Constitution of the Sexual Harassment Complaints Committee:**

Initially, and till further notice, the Committee will comprise of the following four members out of which at least 2 members will be women:

- A Presiding Officer who shall be a Senior Woman Employee.
- Head of Personnel and Human resources; and another employee, men or women, interested in women welfare.
- A member from a Non – Governmental organization or association committed to cause of women or who has had experience in social work or has legal knowledge.
- It shall the endeavor to have one half of total Members so nominated as women provided that the Company has sufficient women employees to be able to fulfill this norm.

### **6.3. RESPONSIBILITIES OF COMPLAINTS COMMITTEE**

- Investigating every formal written complaint of sexual harassment.
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment.
- Discouraging and preventing employment – related sexual harassment.

### **6.4. PROCEDURE**

- Within 90 days of the incident, the complainant (who may or may not be the victim) may lodge an informal complaint with his / her Head of the Department or HR person or directly with the Sexual Harassment Complaints Committee or a formal complaint with his / her Reporting or concerned HR person.
- In case of formal complaint, the Head of the Department or HR person will refer it to the Sexual Harassment Complaints Committee.
- The Committee may decide to conduct an informal or formal procedure for resolving the issue.
- In both the above cases, the committee will conduct preliminary investigation and prepare an investigation report.
- In case the informal procedure is adopted, then depending upon the preliminary findings, the Committee will refer the issue to the Managing Director.
- The Managing Director will resolve the issue, either personally mediating or appointing any person to do so.
- If informal resolution fails, the issue will be referred back to the Committee for formal resolution within 15 days of failure.
- If the complainant does not substantiate the allegations made, then the proceedings will close and the complainant's appeal will be referred to the Managing Director and the Managing Director decision will stand as final.

- If the complainant substantiates the allegations made, then the Committee will call for a formal hearing.
- At the end of the hearing, the Committee will give its conclusion and findings to HR Department.
- If it is concluded that the Guidelines have not been violated, then the proceedings will close and the concerned parties will be intimated through HR Department.
- If it is concluded that the Guidelines have been violated, then the Head of HR will commence disciplinary action, in accordance with the Service Rules and punishment will be imposed based on the severity of the harassment and past records of the respondent. The concerned parties shall also be counseled.
- The disciplinary action / punishment may include, but will not be limited to any one or combination of the following:
  - (i.) Verbal admonition,
  - (ii.) Written warning placed in the respondent's personal file,
  - (iii.) Probation, suspension with or without pay, demotion, removal from administrative duties within a department, expulsion and dismissal or termination.
- At the end of the entire process, registration of the same shall be done in the Company records.
- As a relief to victim, paid leave can be granted based on the need for the period required / transfer to other places if he/she feels safe to work depending on the nature of job done.

#### **6.5. CONFIDENTIALITY**

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interest of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout any investigatory process and at all times, to the extent practicable and appropriate under the circumstances.

#### **6.6. ACCESS TO REPORTS AND DOCUMENTS**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company and maintained in HR Department as "Strictly Confidential", without access to anybody else, except where disclosure is required under disciplinary or other remedial processes.

#### **6.7. PROTECTION TO COMPLAINANT / VICTIM**

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

#### **6.8. FREQUENCY**

The Management reserves the right to review and revise the Policy at its sole discretion, as and when the circumstances warrant.

#### **6.9. CONCLUSION**

In conclusion, the Company reiterates its commitment to providing its women employees, a workplace free from harassment / discrimination and where every employee is treated with dignity and respect.

## **7. REVIEW AND AMENDMENT**

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the statutory provisions and remains effective. This Policy shall be reviewed periodically and may be amended by the Board, as may be deemed necessary. On any amendment of the Policy, the same will be published on the Company's website.

### **Penalty for Non-compliance**

- Non-compliance with certain provisions of the Act will result in imposition of penalty on the Company, in the manner stated in section 26 of the Act.

### **Disclaimer**

- Nothing contained in the Policy shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other rules or law.
- The Company may make any alteration or amendment or rescind any of the clauses of the Policy as and when it finds it necessary to do so, having regard to the provisions of the Act.
- The Company shall be responsible for monitoring the implementation of the Policy, conducting a review of the same from time to time and any alteration or amendment of the Policy or rescission of any of its clauses will be intimated to the employees.

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