

Mangal Industries Limited

Policy on Prevention of Sexual Harassment

Policy Title	Policy on Prevention of Sexual Harassment
Effective Date	01.05.2025
Authorised By	President – Group HR

1.0 SPIRIT AND OBJECTIVE OF THE POLICY

- 1.1 Mangal Industries Limited is committed to create a healthy and invigorating working environment for all people. This policy is specifically focused to women working in Mangal Industries Limited, to enable them work without fear of prejudice, gender bias and sexual harassment.
- 1.2 The objective of this policy is to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto.

2.0 EFFECTIVE DATE AND SCOPE

- 2.1 The policy comes into force with immediate effect
- 2.2 This policy applies to all women whether employed or not, at any of the work place/premises of Mangal Industries Limited

3.0 DEFINITIONS & MEANINGS

- 3.1 **Sexual Harassment:** includes any one or more of the following unwelcome acts or behavior (whether directly or indirectly) namely:-
 - a) physical contact and advances; or
 - b) a demand or request for sexual favours; or
 - c) making sexually colored remarks ; or
 - d) showing pornography; or
 - e) any other unwelcome physical, verbal, non-verbal conduct of sexual nature;

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:-

- f) implied or explicit promise of preferential treatment in her employment; or
 - g) implied or explicit threat of detrimental treatment in her employment; or
 - h) implied or explicit threat about her present or future employment status; or
 - i) interferes with her work or creating an intimidating or offensive or hostile work environment for her; or
 - j) humiliating treatment likely to affect her health or safety.
- 3.2 **Aggrieved woman:** “Aggrieved woman” means any woman working for Mangal Industries Limited on the rolls of the Company or not, including those on deputation, ARTS, Contract, Part time or working as Consultants.
- 3.3 **Presiding Officer:** “Presiding Officer” means who is heading the Internal Committee.
- 3.4 **Complaint:** “Complaint” means a written statement disclosing identity of Complainant and Alleged with narration of the incident on sexual harassment duly signed by the Complainant.

3.5 Location Support Representative (LSR): A representative from each location who will help in smooth execution of PPSH, extend necessary support to female aggrieved employee and to ensure that the complaints will be genuine.

4.0 CONSTITUTION OF INTERNAL COMMITTEE (IC)

4.1 An **Internal Committee** has been constituted by the Management to consider and redress complaints of Sexual Harassment, which is shown in Annexure-I. The Committee constitutes **7** members:

- 1) Mrs. Mamatha. S, Deputy Manager - Material Resource Planning (M07) as Presiding Officer
- 2) Ms. Mounika Yalla, Deputy Engineer - Maintenance (SE1) IC Member
- 3) Mrs. Sandhya Rani. Y, Asst. Engineer - Stores (SE2) IC Member
- 4) Mrs. Bhuvaneswari. G, Officer - Finance & Accounts (SF1) IC Member
- 5) Ms. Preethi. A, Timekeeper - COM-MIL (OR5) IC Member
- 6) Mr. Ravi Kumar. K, Business HR Head (M05) IC Member
- 7) Ms. Sunitha Bhagyalakshmi, External IC Member (Brief Profile of Ms. Sunitha Bhagyalakshmi's at the end of this policy)

4.2 A **Location Support Representative (LSR)** is available at each location and the details of the LSRs are available with Business HR team

5.0 PROCESS OF COMPLAINT HANDLING:

- 5.1 Any aggrieved woman who feels and is being sexually harassed directly or indirectly may send a complaint in a sealed cover narrating the alleged incident in writing with her signature within 10 days of occurrence of incident to the **Presiding Officer** / any member of the **IC** as prescribed in Annexure-I.
- 5.2 Within fifteen days, the Committee members shall hold a meeting with the Complainant and shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- 5.3 Thereafter, within ten days of discussion with the complainant, the committee shall hold a dialogue with the alleged for further clarification on the complaint.
- 5.4 Subsequently, the Complainant and the are called upon for the process of conciliation to settle the issue at mutual consensus.
- 5.5 In the case of disagreement in the Conciliation process, an "Enquiry" shall be conducted and concluded by the Committee in the laid-down process.
- 5.6 It is left to the discretion of the IC to cross-examine the Complainant and the Alleged.
- 5.7 If the Complainant or the person, against whom complaint is made, desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- 5.8 The Committee shall call upon all witnesses mentioned by both the parties.
- 5.9 The Committee shall provide every reasonable opportunity to the Complainant and Alleged, for putting forward and defending their respective case.

- 5.10 The IC shall hold discussions with concerned parties and share their findings and recommendations to the Management (Group Chairman / Vice Chairman and President – Group HR) within 40 days from the closing of discussion with the alleged. (Within Seventy five days from the date of receipt of complaint).
- 5.11 The recommendations of the committee shall be treated as an enquiry report on the basis of which an erring employee will be awarded an appropriate punishment within 90 days from the date of receipt of Complaint and in line with Certified/Model Standing Orders / Service Rules of the Company.
- 5.12 The probable punishment will be Censure, Warning, Fine, Suspension, Dismissal or any other punishment proposed basing on the severity of the incident.

6.0 GENERAL CONDITIONS:

- 6.1 The Complainant and the alleged shall work for Mangal Industries Limited only.
- 6.2 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.
- 6.3 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.
- 6.4 The Committee shall keep complete and accurate documentation of the complaint, its investigation and the decision thereof. The incident would be documented in both the complainant's and the alleged' s files with the full report of the Complaints Committee.

7.0 EXPECTED BEHAVIORS AND CULTURAL IMPACT:

- 7.1 The Policy aims at facilitating speedy and transparent resolution of grievances pertaining to Sexual Harassment of Women at workplace.
- 7.2 The respective members of Internal Committee are expected to resolve the grievances in an amicable settlement preferably in conciliation manner.

8.0 GENERAL INFORMATION:

- 8.1 In case of any question arises to the interpretation of the scheme or any clauses thereof or as to any rights or obligations arising from the policy, the decision of the President- Group HR shall be final and binding.
- 8.2 The Management reserves the right to withdraw, amend, alter or modify the policy at any point of time.

Internal Committee Members and their Addresses

Mrs. Mamatha. S

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Brief Profile of Ms. Sunitha Bhagyalakshmi



Ms. Sunitha Bhagyalakshmi with an extensive career spanning over two decades Sunitha is a seasoned legal and POSH certified Professional with expertise in preventing Sexual Harassment in the work place, She specializes in contract drafting, diversity and inclusion training, employee sensitization and Internal committee member(IC) for several Organization, ensuring legal compliances and fostering safe work environments.

Sunitha's expertise includes drafting and reviewing key organizational documents, always with a focus on balancing Business needs with risk management. Her carrier features pivotal roles at ICIC Bank, HDFC Bank, Axis Bank, LawSikho, Limuna Datametrics Pvt, Legalese Solutions LLC, and LexisNexis India Pvt. Ltd., where she demonstrated her proficiency in balancing operations, legal operations, contract drafting, legal research and editorial services.

Sunitha's unique combination of legal acumen, training expertise, and leadership makes her a trusted professional in the field of workplace harassment prevention and legal operations.