

POLICY & PROCEDURE FOR RESOLUTION OF SEXUAL HARASSMENT
ISGEC HEAVY ENGINEERING LIMITED.

1.0 POLICY

- 1.1 Isgec Heavy Engineering Limited, hereinafter referred to as (the **Company**) is an equal employment opportunity company and is committed to provide a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable.

2.0 SCOPE

- 2.1 This Policy extends to all permanent, contractual, and casual employees of the Company and includes trainee, apprentice or called by any other name.
- 2.2 Sexual harassment would mean and include any of the following:
- i) unwelcome sexually determined physical contact, advances, request or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity or otherwise;
 - ii) unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect her/his performance.

3.0 INTERNAL COMPLAINT REDRESSAL COMMITTEE

- 3.1 A Committee at Corporate has been constituted by the Management to consider and redress complaints of Sexual Harassment. The Presiding Officer and Members of the Committee are as follows:

Committee:

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|-------------------------------|-------------------|
| 1. Mrs. Radhika Arora | Presiding Officer |
| 2. Mr. Vivek Kumar Sehgal | Member |
| 3. Mr. Ram Sharma | Member |
| 4. Mrs. Nupur Bagchi Galhotra | Member |
| 5. Advocate Meenakshi Yadav | Member(External) |

- 3.2 A quorum of 3 members is required to be present for the proceedings to take place on the matters of Sexual Harassment. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

- 3.3 Units located at Yamunanagar & Muzaffarnagar may constitute a local committee comprising of 4 members, out of which 2 members shall be women. The Unit Heads may notify such committee from time to time.

4.0 ENQUIRY AND REDRESSAL PROCESS

- 4.1 Any aggrieved employee who has been or is being sexually harassed directly or indirectly at the work place may submit a complaint of such incident to any member of the Committee in writing with his/her signature within 10 days of occurrence of incident.
- 4.2 The Committee will hold a meeting with the Complainant within a fortnight of the receipt of the complaint.
- 4.3 At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If, the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
- 4.4 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him/her to give an explanation, where after, if not requested by the aggrieved person otherwise or felt by the committee to refer the matter to police, an "Enquiry" shall be conducted and concluded within a period permitted in law in this regard.
- 4.5 Such an enquiry will be completed by the Committee within a reasonable period. Findings & recommendations will be communicated to the Management for further action, in accordance with the Company's Service Rules. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 4.6 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.
- 4.7 In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management in accordance with the service rules of the Company.

5.0 MISCELLANEOUS

- 5.1 The Enquiry and Redressal Process guided in this policy to the Committee will be subject to guidelines framed by law in this regard.

- 5.2 Any provision of this policy if, conflicts with any provisions of law, such provisions of law shall prevail over the provisions of this policy.
- 5.3 Provisions of this policy may be modified, altered or amended by the management to remove any difficulty or to take care of provisions of law or felt necessary otherwise.

For Isgec Heavy Engineering Ltd.


(ADITYA PURI)
Managing Director



Isgec Heavy Engineering Ltd., Noida

10th April' 2026

**INTERNAL COMPLAINTS COMMITTEE UNDER THE SEXUAL HARASSMENT OF
WOMEN AT WORKPLACE**

(PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

1.As per the POSH Act, 2013, the Internal Complaints Committee is re-constituted for Corporate Offices & Businesses located at **Noida location** with effect from **1st December 2024:-**

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|------------------------------------|---|
| a) Ms. Radhika Arora, CHRO | - Presiding Officer
(M: 9971007339) |
| b) Mr. Vivek Kumar Sehgal | -Member
(M: 9599056467) |
| c) Mr. Ram Sharma | - Member
(M: 8053119811) |
| d) Ms.Nupur Bagchi Galhotra | -Member
(9899599853) |
| d) Advocate Meenakshi Yadav | - Member External)
(M: 7042896989) |

2.Main features of “**The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**” are mentioned in the enclosed annexure.


Aditya Puri
Managing Director