



JUPITER[®]

ENGINEERING THE FUTURE

JUPITER WAGONS LIMITED

CIN: L28100MP1979PLC049375

POLICY ON PREVENTION OF SEXUAL HARASSMENT **(POSH POLICY)**

1. Preamble

Jupiter Wagons Limited (hereinafter referred to as the **Company or JWL**) believes every individual deserves the right to work with dignity, free from of prejudice and gender bias, and in a safe, harassment-free environment.

JWL commits fostering a workplace where security, respect, and empowerment resonate throughout. Upholding the fundamental principles of equality, dignity, and professionalism, the company recognize the inherent right of every employee to experience an environment free from any form of harassment.

This preamble underscores JWL dedication to maintain a workplace culture that promotes awareness, sensitivity, and immediate redressal of any instances of sexual harassment. Through comprehensive policies, education, and open communication channels, JWL strives to create an atmosphere where every employee feels valued, respected, and protected against all forms of sexual harassment.

2. Effective Date

This policy shall be effective from the date of approval from the Board, unless stated otherwise.

3. Scope and applicability

JWL POSH policy is based on Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

This policy is applicable to all employees whether engaged directly or through an agent including a contractor, with or without the knowledge of the principal employer. They may be working for remuneration, on a voluntary basis or otherwise. Further, they could be a co-workers, a contract workers, probationers, trainees, apprentices, or called by any other such names.

4. Objective

The main objective of this policy aims to create a safe and conducive work environment that enables employees to work with dignity as well as without fear of prejudice, gender bias and sexual harassment. It seeks to prevent such incidents from occurring in the first place and provides a fair and effective mechanism for addressing them if they do happen.

The key objectives of this policy are to:

- a. Prevent Sexual Harassment by creating a safe and respectful work environment free from any form of sexual harassment for all employees, regardless of their gender, designation, or employment status.
- b. Provide prompt and fair resolution of complaints with access to confidential avenues for reporting and appropriate action against perpetrators, ranging from warnings to termination of employment.
- c. Promote awareness and understanding about sexual harassment on types, impact, rights and responsibilities on individuals and the organization.
- d. Maintain a positive and productive work environment by ensuring that all employees can focus on their work without fear of harassment or discrimination.

5. Definition

In this policy, the meanings are assigned to the words, terms, expressions, and their derivatives in the Act and will apply unless the context indicates otherwise or if something is undefined.

- a. **"Act"** refers to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, along with any rules made under it and any amendments made to it from time to time.
- b. **"Sexual Harassment"** includes any one or more of the following:
Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
 - i. physical contact and advances; or
 - ii. a demand or request for sexual favours; or
 - iii. making sexually coloured remarks; or
 - iv. showing pornography; or
 - v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- c. **Aggrieved woman/complainant:** Any woman subjected to sexual harassment at the workplace.
- d. **Respondent employee:** Any employee accused of sexually harassing another employee.
- e. **Employer:** The person who employs the aggrieved woman/complainant or the respondent employee.
- f. **Workplace:** In addition to the place of work [Head office / Branch offices, Factories] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course and/or arising out of employment/ contract/ engagement with Jupiter Wagons Limited (JWL), including transportation provided for undertaking such a journey.
- g. **Internal Committee:** A committee constituted by the employer to inquire into complaints of sexual harassment and recommend appropriate action.
- h. 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:
 - i. implied or explicit promise of preferential treatment in her employment; or
 - ii. implied or explicit threat of detrimental treatment in her employment; or
 - iii. implied or explicit threat about her present or future employment status; or
 - iv. interference with her work or creating an intimidating or offensive or hostile work environment for her;
or
 - v. humiliating treatment likely to affect her health or safety.

6. Roles and Responsibilities

Employees, as a custodian of JWL values, Code of Conduct, and statutory guidance have responsibilities, they are:

- a. **Individual:**
 - i. All individuals have a duty to uphold the rights of others and actively prevent harassment. This involves.
 - ii. Refraining from participating in any activities that constitute harassment.
 - iii. Providing support to those facing unwelcome behaviour and encouraging them to reject it.
 - iv. Acting as a witness if someone decides to file a complaint against harassment.

Individuals shall inform others about unwelcome behaviour, recognizing that specific actions may be unintentional. While unintentional actions are not acceptable, they provide an opportunity for the person to amend or cease their offensive behaviour.

- b. **Managerial:** Managers at JWL (a reporting authority like MD, CEO or anyone who is responsible for outcome of work and has a reporting relationship with the complainant) bear the responsibility of ensuring a harassment-free environment and promoting equal treatment for all.
 - i. They must guarantee that every employee comprehends the zero-tolerance policy toward harassment, with a commitment to taking complaints seriously.
 - ii. It is crucial that complainants, respondents, or witnesses shall not receive to any form of victimization during the complaint resolution process.

7. Redressal Mechanisms

Constitution of Internal Complaints Committee (ICC)

As a part of redressal of complaints, an "Internal Complaints Committee" shall be present at each location including corporate office and manufacturing plants. The committee's details are to be shared to all concerned members at the location (workplace).

The Managing Director & CEO will be part of the selection process for the Committee, including the Chairperson, as detailed below:

Designation of Committee	Remarks
Presiding Officer	Should be a woman employed at the Senior Level
External Members	NGO (Non-governmental organisation) Member or a person who is familiar with issues relating to Sexual Harassment (familiarity in labour, service, civil or criminal law)
Members	Nominated at offices/sites

**Note:*

- i. At least 50% should be woman members.
- ii. Additional members may be opted to ensure that all significant locations have representatives for ease of communication and raising of concerns.
- iii. Not less than 4 members shall be present to form a quorum which shall include Chairperson and a lady member.
- iv. The Presiding Officer and every member of the Committee shall hold office for a period not exceeding (3) three years from the date of nomination.
- v. MD & CEO may change in the composition of the committee from time to time.

8. Quorum

Quorum for a POSH (Prevention of Sexual Harassment) Internal Complaints Committee (ICC) limits minimum number of members for an ICC to be four (including the Presiding Officer and External Member).

9. Responsibilities of ICC Committee

The ICC committee will be responsible for:

- i. Receiving complaints of sexual harassment at the workplace
- ii. Initiating and conducting inquiry as per the established procedure
- iii. Submitting findings and recommendations of inquiries
- iv. Coordinating with the employer in implementing appropriate action
- v. Maintaining strict confidentiality throughout the process as per established guidelines
- vi. Submitting annual reports in the prescribed format

10. Complaints

In accordance with the Act, the complainant may seek formal intervention. The complainant can submit a written complaint to Internal Complaints Committee within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incident.

If the complaint is verbal, the recipient of the complaint will document it in writing and complainant's signature will be considered as a part of the acknowledgement process.

If the complainant (aggrieved woman) is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.

- Legal heir, relative or friend
- Co-worker
- Any person having the knowledge of the incident.

10. Conciliation before inquiry

Upon receiving complaint, the ICC may, at the complainant's (aggrieved woman) request, shall attempt conciliation before starting an inquiry.

Monetary settlements are not permitted.

If settled, the committee will report to the MD & CEO for action. Conciliation shall be done within 2 weeks of the complaint. Copies of the settlement shall be given to both parties.

The committee shall provide copies of the settlement to complainant & respondent. Once the conclusion is reached, no further inquiry shall be conducted.

11. Resolution through formal inquiry

The committee shall commence an inquiry under the following circumstances:

- i. The aggrieved woman does not seek conciliation.
- ii. Conciliation efforts do not lead to any resolution.
- iii. The complainant notifies the committee of any non-compliance with the terms or conditions of a settlement reached through conciliation, has not been complied with by respondent.

The Committee proceeds to make an inquiry into the complaint within a period of 1 week of its receipt of the original complaint/closure of conciliation/repeat complaint.

Provided that both the parties (Complainant and Respondent) are employees, both the parties shall be given the opportunity to be heard during the inquiry. A copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.

A minimum of four committee members, including the Presiding Officer, must be present during the inquiry.

12. Action during pendency of Enquiry

While the inquiry is ongoing, upon receiving a written request from the complainant, the JWL ICC committee will have the authority to suggest to the Managing Director & CEO to:

- a. Transfer either the complainant or the respondent to a different workplace.
- b. Provide a maximum of 3 months' leave to the aggrieved woman, in addition to any other entitlement.
- c. Restrict the respondent from evaluating the complainant's work performance.
- d. Offer any other suitable relief as deemed necessary.

Once the interim relief are into effect, the MD & CEO shall notify the committee about the implementation.

13. Inquiry Report

The Internal Complaints Committee will submit a report of its findings to the Managing Director & CEO within 10 days from the completion date on concluding the inquiry, this report shall be shared with the concerned parties. The Managing Director & CEO is responsible for acting on the recommendations within 60 days of receiving the report.

If, in the determination of the Internal Complaints Committee, there is no basis for a case of Sexual Harassment, the committee may close the complaint and must communicate this decision to the management of JWL.

14. Penalties & Punishments

When the committee determines that the allegation against the respondent is true, it will recommend to the MD & CEO to take appropriate action for sexual harassment as misconduct, in alignment with the relevant service rules and policies. Actions may include:

- i. Counselling
- ii. Censure or reprimand
- iii. Requiring an apology from the respondent.
- iv. Issuing a written warning.
- v. Withholding promotions and/or increments.
- vi. Suspension
- vii. Termination
- viii. Any other action deemed fit by the Management.

15. Malicious Allegation & False Evidence

When the committee concludes that the accusation against the respondent is either malicious, or the aggrieved woman or any other complainant has intentionally filed a false complaint, or has presented forged or misleading documents at JWL, it may recommend to the MD & CEO of JWL to take appropriate action against the woman or

person filing the complaint. The recommended actions should resemble those proposed for respondents in cases of substantiated complaints.

16. Confidentiality

The confidentiality of information such as the complainant's identity, respondent details, witness identities, statements and other evidence gathered during the inquiry process, as well as the recommendations of the committees and actions taken by MD & CEO will be confidential. It shall not be published, communicated, or made known to the public, press and media in any manner.

Any individual violating the confidentiality clauses is liable to face disciplinary action as specified in the relevant act.

17. Appeal

If any party remains dissatisfied or experiences further grievances regarding the adoption or non-adoption of the provided recommendations, they have the right to appeal to the appellate authority in accordance with the Act and rules. This appeal shall be within 90 days from the date of the recommendations.

18. Review and Revision

This policy will undergo periodic review to ensure its effectiveness and relevance in evolving workplace dynamics. Any necessary updates will be shared by corporate office to all employees to maintain clarity and alignment with JWL's commitment to a harmonious workplace.
