

**POLICY ON
PREVENTION OF
SEXUAL HARASSMENT
FOR KAY JAY FORGINGS LIMITED**

CIN: U74899DL1983PLC029298

Registered Office: A-8 Mava Puri Industrial Area Phase-1 New Delhi- 110 064 Delhi India

I. INTRODUCTION

- 1.1** **Kay Jay Forgings Limited** (the “**Company**”) is committed to creating a safe work environment that is free from any form of sexual harassment and where all employees are treated with dignity and respect. The company is dedicated to maintaining an environment that is free from coercion and intimidation.
- 1.2** The Company shall adopt certain procedures and guidelines to govern cases against Sexual Harassment. The procedure has been provided below in this policy.
- 1.3** All allegations of Sexual Harassment shall be taken seriously by the internal complaints committee and shall be governed by this policy.
- 1.4** This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “**The Act**”). Accordingly, while the policy covers all the key aspects of The Act, for any further clarification reference shall always be made to the Act and the provisions of The Act shall prevail. (“**The Policy**”)

II. SCOPE

- 2.1** This Policy has been drafted keeping in mind the basic tenets of the Act and any amendments made thereto, read with the rules framed thereunder read with the rules framed thereunder. This Policy will apply to all the Employees (as defined hereinafter) at the Workplace. **Annexure A** of this Policy provides an indicative list of examples of behavior which may be found to constitute sexual harassment in the workplace. The Policy intends to ensure that no woman Employee is subjected to sexual harassment and it is applicable to all Employees of the Company and its fraternity. “**Employee**” as referred to in this Policy covers all employees of, whether permanent or temporary, probationary or part-time or working as a consultant or on a voluntary basis or engaged through a contractor or agent.
- 2.2** Where Sexual Harassment occurs against any female Employee as a result of an act by a third party or outsider while on official duty, the Company or the Internal Complaints Committee will take all necessary and reasonable steps as per the applicable rules and regulations, to initiate action at the workplace of the third party or outsider. This Policy shall be applicable to any allegation of Sexual Harassment at office premises including any place visited by an Employee arising out of or during the course of employment and/or transportation provided by the Company. (“**Workplace**”).

III. DEFINITIONS

- 3.1** Unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Policy, shall have the meaning assigned to them below:
 - a. “Act”** means “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and any amendment thereto;
 - b. “Aggrieved Woman”** means any female Employee of our Company or any woman who alleges to have been subjected to any act of Sexual Harassment at the Workplace;

- c. **“Employee”** A person employed at the 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 coworker, a contract worker, probationer, trainee, apprentice or by any other such name;
- d. **“Employer”** A person responsible for management, supervision and control of the workplace;
- e. **“Internal Complaints Committee”** means a committee by that name, constituted by the board of the Company as per the provisions of The Act;
- f. **“Respondent”** means the person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman; and
- g. **“Sexual harassment”** means and includes: -
- i. such unwelcome behaviour of a male Employee towards a female Employee (whether directly or by implication as:
 - Physical contact and advances;
 - a demand or request for sexual favours;
 - Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;
 - Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.;
 - Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
 - Giving gifts or leaving objects that are sexually suggestive;
 - Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;
 - Persistent watching, following, contacting of a person; and
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 - ii. The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment :
 - Implied or explicit promise of preferential treatment to a woman employee in her employment; or
 - Implied or explicit threat of detrimental treatment to a woman employee in her employment; or
 - Implied or explicit threat to a woman employee about her present or future employment status; or
 - Interference with her work or creating an intimidating or offensive or hostile work environment for her; or
 - Humiliating treatment likely to affect her health or safety.

The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the experience of the aggrieved woman.

Any act of Sexual Harassment, whether committed within or outside of office hours will fall under the purview of this Policy.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories - quid pro quo and creation of a hostile working environment.

(a) Under the quid pro quo (meaning this for that) form of harassment, a person or authority, usually the superior of the victim, demands sexual favors for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

(b) A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on personal dignity. For example, an employee tells offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co-workers.

However, an employee who is sexually harassed can complain about the same even if there is no adverse job consequence.

h. "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 of and/or arising out of employment/ contract/ engagement with the Company, including transportation provided for undertaking such a journey.

IV. RESPONSIBILITIES OF THE EMPLOYEES

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.

V. INTERNAL COMPLAINTS COMMITTEE

5.1 The Internal Complaints Committee shall comprise of:

- a.** A Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the Employees ("**Presiding Officer**"); In case a senior level woman employee is unavailable, the Presiding Officer shall be nominated from other offices of the Company. In case a senior level woman employee is unavailable in other offices, the Presiding Officer shall be nominated from any other workplace of the Company;
- b.** Not less than 2 (two) members from amongst Employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;

- c. One member from amongst non-governmental organization or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment; and
- d. A list of members, as on the date of publication of this Policy, along with their contact details is annexed herewith at “Annexure B”. Any updates to the said list would be appropriately circulated and made known to all Employees through notice from time to time.

5.2 The Internal Complaints Committee will operate on the following guidelines:

- a. The person against whom the allegation of Sexual Harassment has been made by the Aggrieved Woman, the Internal Complaints Committee shall meet as and when any instance of violation of the Policy is referred to the committee and, in any case, at least once in a year.
- b. Internal Complaints Committee shall prepare an annual report and submit the report pertaining to number of cases filed and their disposal under The Act to the board of directors.
- c. The Presiding Officer and the members of the Internal Complaints Committee will hold the position upto three years from the date of their nomination.
- d. The Presiding Officer or the members can be removed from the Internal Complaints Committee due to contravention of any of the provision of The Act or other disqualifications as defined in The Act:

The ICC shall under the authorization of the board of directors or committee responsible for formulation and administration of polices for the organization or any other Senior officer or Director/ Managing Director nominated by the board of directors or committee, have the power to sub-delegate their authority to a sub-committee of ICC for monitoring the local issues at Manufacturing Units/ Functional Departments of the Company/ establishments.

The board of directors may re-constitute the ICC as may be required from time to time, within the stipulated requirements under The Act.

VI. COMPLAINT PROCEDURE

6.1 Lodging a Complaint:

- a. An Aggrieved Woman may lodge a complaint of Sexual Harassment (“Complaint”) against a Respondent who could be an Employee or anyone else upon whom this Policy is applicable, with any of the members of the Panel or through a whistle Blower platform not later than three months from the date of occurrence of the alleged incident. However, it is expected that any such matter must be reported as early as possible to the Internal Complaint Committee without any delay in the larger interest of justice.
- b. Such a Complaint shall necessarily be in writing, video or email and the complainant shall sign at the foot of each page of the Complaint.
- c. Where an Aggrieved Woman is unable to make a Complaint on account of her physical incapacity, a complaint may be filed by

- i. her relative or friend, or
 - ii. her co-worker, or
 - iii. an officer of the National or State Commission for Women, or
 - iv. any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- d. Where an Aggrieved Women is unable to make a complaint on account of her mental incapacity, a complaint may be filed by
 - i. her relative or friend, or
 - ii. a special educator, or a qualified psychiatrist or psychologist,
 - iii. the guardian, or authority under whose care she is receiving treatment or care; or
 - iv. any person who has knowledge of the incident jointly with any of the persons mentioned in (i) to (iii) of this paragraph.
- e. Where an Aggrieved Women, for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the Aggrieved Women.
- f. The Internal Complaints Committee may, for the reasons to be recorded in writing, extend the time limit, if it is satisfied that there were unavoidable circumstances which prevented the Aggrieved Woman from filing a complaint within the said period. Such complaint shall contain all the material and relevant details concerning the alleged Sexual Harassment including the name of the contravener. The information disclosed by such complainant should be treated as confidential information by the members of the Internal Committee.
- g. The Complaints Committee will hold a meeting with the complainant within a period of seven days of the receipt of the complaint and advance intimation in writing will be given to the Complainant of the same. However, in the event the Complaint does not fall under the purview of Sexual Harassment or the Complaint on the face of it does not disclose an element or offence of Sexual Harassment, the Complaints Committee may drop the complaint after recording the reason/s thereof and shall subsequently communicate the same to the complainant, in writing.
- h. A copy of the Complaint shall be shared with the Respondent with some advice to submit his/ her reply along with supporting documents and the names and addresses of the witnesses, within a period not exceeding 10 (ten) working days from the date of receipt of the documents.
- i. The Complainant shall be granted an opportunity to record her statement to prove her allegations and may record the statement of an Employee as witness, and produce corroborative material with documents, etc., to substantiate her complaint/ allegations.
- j. The Respondent shall be granted an opportunity to record his/ her statement and produce evidence in his/ her defense.
- k. The Internal Complaint Committee have the right to close the inquiry proceedings or to give an ex-parte decision on the complaint, if the Aggrieved Woman(complainant) or the accused (Respondent) fails, without sufficient cause, to present herself or himself for 3 consecutive hearings convened by the Presiding Officer, as the case may be, provided that

such termination or ex-parte order may not be passed without giving a notice in writing, 15 (fifteen) days in advance, to the party concerned.

- i.** In case the complaint made by the complainant is found to be false and malafide at any stage, it shall amount to misconduct and the complainant shall be liable for appropriate disciplinary action as per the Service Rules.
- m.** The Internal Complaints Committee shall complete the enquiry within 90 (ninety) days from receipt of the complaint and submit its report with its findings to the Management within a period of 10 (ten) days from the date of completion of the enquiry and such report be made available to the concerned parties.
- n.** In case the complainant fails to prove her allegations made in her complaint, the matter shall stand closed.
- o.** In case the Respondent is found guilty of The Act of sexual harassment as mentioned in the complaint, the management shall take appropriate action him in accordance with the applicable provisions of law.
- p.** The parties shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- q.** If the Aggrieved Woman would like to initiate action under the Bharatiya Nyaya Sanhita 2023 (“BNS”), she may inform the Company management of the same, and the management will provide necessary assistance to the Aggrieved Woman to file the complaint in relation to the offence under the BNS.

6.2 Resolution through Conciliation:

- a.** Once the Complaint is received, before initiating the inquiry, the committee may take steps to conciliate the Complaint between the complainant and the Respondent. This is only if requested by the Aggrieved Woman. No monetary settlement can be made as a basis of conciliation.
- b.** It is made clear to all parties that conciliation in itself doesn't necessarily mean acceptance of Complaint by the Respondent. It is a practical mechanism through which issues are resolved or misunderstandings cleared.
- c.** In case a settlement is arrived at, the committee records & reports the same to the Employer for taking appropriate action. Resolution through conciliation shall be done within 2 weeks from the date of receipt of complaint.
- d.** The committee shall provide copies of the settlement to complainant & Respondent. Where a settlement is arrived at, no further inquiry is to be conducted by the committee.

6.3 Resolution through Formal Inquiry

The committee will initiate inquiry in the following cases:

- No conciliation is requested by the Aggrieved Woman
- Conciliation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived 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.

a. Procedure of Inquiry into Complaint

- i. Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- ii. The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint.
- iii. At the first meeting, the Committee members shall hear the Complainant and record her allegations. After that Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- iv. Upon receipt of the complaint, the committee will send a copy of the complaint to the Respondent within seven working days of receiving the complaint. Respondent shall reply to such complaint within 10 working days of receiving it.
- v. The written explanation provided by respondent shall also be provided to complainant.
- vi. If the complainant or the respondent desires any witness/es to be called, they shall communicate in writing to the Committee the names of witness/es that they propose to call.
- vii. The Committee shall call upon all witnesses mentioned by both the parties.
- viii. The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- ix. No legal practitioner can represent any party at any stage of the inquiry procedure.
- x. The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice.
- xi. In conducting the inquiry, a minimum of three committee members including the Presiding Officer are to be present.
- xii. The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.
- xiii. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.
- xiv. 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 and shall also notify to the management of Company.

b. Interim Relief

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the employer to:

- Transfer the complainant or the respondent to any other workplace, or
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled, or
- Prevent the respondent from assessing complainant's work performance, or
- Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the same is informed to the committee.

c. **Termination of Inquiry**

Committee may terminate the inquiry or give ex parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without any sufficient reason. Provided that fifteen days (15 days) written shall be given to the party, before termination of enquiry or ex parte order.

d. **Inquiry Procedure**

All proceedings of the inquiry is documented. The Committee interviews the respondent separately and impartially. Committee states exactly what the allegation is and who has made the allegation. The respondent is given full opportunity to respond and provide any evidence etc. Detailed notes of the meetings are prepared which may be shared with the respondent and complainant upon request. Any witnesses produced by the respondent are also interviewed & statements are taken.

If the complainant or respondent desires to cross examine any witnesses, the Committee facilitates the same and records the statements.

In case complainant or respondent seeks to ask questions to the other party, they may give them to the Committee which asks them and records the statement of the other party.

Any such inquiry is completed, including the submission of the Inquiry Report, within 90 days from the date on which the inquiry is commenced. The inquiry procedure ensures absolute fairness to all parties.

e. **Considerations while preparing inquiry report**

While preparing the findings/recommendations, following are considered:

- Whether the language used (written or spoken), visual material or physical behavior was of sexual or derogatory nature
- Whether the allegations or events follow logically and reasonably from the evidence
- Credibility of complainant, respondent, witnesses and evidence
- Other similar facts, evidence, for e.g. if there have been any previous accounts of harassment pertaining to the respondent
- Both parties have been given an opportunity of being heard
- A copy of the proceedings were made available to both parties enabling them to make representation against the findings

A copy of the final findings is shared with the complainant and the respondent to give them an opportunity to make a representation on the findings to the committee

f. Action to be taken after inquiry

Post the inquiry the committee submits its report containing the findings and recommendations to the employer, within 10 days of completion of the inquiry.

The findings and recommendations are reached from the facts established and is recorded accurately.

If the situation so requires, or upon request of the complainant, respondent or witness, Management of the Company may decide to take interim measures such as transfer, changing of shift, grant of leave etc. to protect against victimization or distress during or subsequent to the course of inquiry, pending the final outcome

g. Complaint unsubstantiated

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter.

Further, the committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the company

h. Complaint substantiated

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- (i) Undergoing a Counselling session
- (ii) Censure or reprimand
- (iii) Apology to be tendered by respondent
- (iv) Written warning
- (v) Withholding promotion and/or increments
- (vi) Withholding of pay rise or increments
- (vii) Deduction from salary
- (viii) Suspension
- (ix) Termination from service
- (x) Financial Penalty (In accordance with the mental, physical trauma, loss of career opportunity, medical expenses) in lump sum or in instalments
- (xi) Or any other action that the Management may deem fit

If the complaint is of a serious nature, involving threats of reprisal or risk of recurrence or refusing the order/judgment of the employer, then a criminal case shall be filed against him/her before the police/court at the discretion of the Complaint Committee.

i. **Malicious Allegations**

Where the committee arrives at the conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the employer to take action against the woman or the person making the complaint as per the service rule applicable.

j. **Confidentiality**

Notwithstanding anything contained in the Right to Information Act, 2005, contents of the complaint, the identity and addresses of the Aggrieved Woman, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Complaints Committee and the action taken by Company shall not be published, communicated or made known to the public, press or media in any manner.

k. **Awareness**

Awareness programme to be organised to:

- Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- Carry out orientation programs and seminars for the Members of the Internal Committee.
- Conduct capacity building and skill building programs for the Members of the Internal Committee.
- Declare the names and contact details of all the Members of the Internal Committee.
- Use modules developed by the State Governments to conduct workshops and awareness programs for familiarizing the employees with the provisions of The Act.

l. **Appeal**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the appellate authority in accordance with The Act and rules, within 90 days of the recommendations being communicated.

VII. PROTECTION OF THE AGRIEVED WOMAN

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 the 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.

VIII. AMENDMENT

The board of directors of Company may amend this Policy from time to time to meet the legal or implementation changes.

Version approved by: The Board of Directors

Effective Date: August 18, 2025

Place: Ludhiana

Note: Approved in the meeting dated August 18, 2025

ANNEXURE A

Some examples of Sexual Harassment at the workplace

VISUAL CONDUCT

- a) Leering;
- b) making sexual gestures;
- c) displaying sexually suggestive or explicit objects, pictures (still or moving), cartoons, graffiti or posters in any manner, including as part of e-mail transmissions; etc.

VERBAL CONDUCT

- a) Whistling and catcalls;
- b) foul or obscene language;
- c) making or using derogatory comments which are sexual in nature;
- d) explicit discussions about sexual activities/behaviours;
- e) comments about a person's physical attributes;
- f) spreading rumours about another person's sexual activities/conduct and/or partners;
- g) jokes which contain offensive, obscene or lascivious content;
- h) sexual advances / Sexual propositions;
- i) sexual innuendo or double entendre; etc

WRITTEN CONDUCT

- a) Suggestive, obscene or propositioning letters, notes, greeting cards or invitations, including but not limited to those transmitted via e-mail;
- b) displaying pictures (still or moving), cartoons, graffiti or posters in writing, including but not limited to e-mail; etc.

PHYSICAL CONDUCT

- a) Unwelcome touching
- b) sexual assault;
- c) kissing / hugging / grabbing;
- d) coercing another person to participate in sexual intercourse or other sexual behaviours;
- e) impeding or blocking movements;
- f) any physical interference with normal work or movement;
- g) sexual gestures; etc.

ANNEXURE B
Index of Members of the Internal Complaints Committee

Sr. No.	Name of Member	Position	Contact Details
			Phone Number and Email ID
1	[●]	[●]	[●]
2	[●]	[●]	[●]
3	[●]	[●]	[●]
4	[●]	[●]	[●]

The details of the primary contact for addressing the problems are as under:

Phone Number: [●]

Email: [●]