

AEQUS LIMITED*

Prevention of Sexual Harassment Policy

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* Formerly known as Aequs Private Limited

INTRODUCTION

Aequus Limited (hereinafter referred to as the "**Company or Aequus**"), is committed to providing a safe and conducive work environment to the Employees.

Harassment of any kind including Sexual Harassment is forbidden. Every Employee has the right to be protected against harassment, regardless of whether the respondent considers his/her behavior to be normal or acceptable and whether the aggrieved person can avoid the harassment.

Sexual Harassment is an unwelcome behavior, that is personally offensive, that debilitates morale and, therefore, interferes with work effectiveness. Behavior that amounts to Sexual Harassment may result in disciplinary action, up to and including dismissal. Aequus is committed to providing a work environment free of Sexual Harassment. Sexual Harassment affects the dignity of every employee at work and Company follows a 'zero tolerance policy' towards any form of Sexual Harassment.

In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the "**Act**") & the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (hereinafter referred to as the "**Rules**"), our Company has framed the following policy (the "**Policy**") for prevention of sexual harassment at workplace.

SCOPE

This Policy is applicable to all Employees associated with Aequus.

OBJECTIVE

The objective of this Policy is to reiterate the Aequus' commitment to:

- a) Provide "Right to Work" with dignity and right to a safe environment free from any form of Sexual Harassment;
- b) Create a harmonious and productive working environment free from Sexual Harassment; prevention and redressal of complaints related to Sexual Harassment from an Aggrieved Person and for matters connected therewith or incidental thereto;
- c) Protect the privacy of the individuals involved and to ensure that the Aggrieved Person and the Respondent are treated fairly. Information about individual complaints and their disposition is considered confidential; and
- d) Encourage Employees to express freely, responsibly and in an orderly way, opinions and feelings about any problems or complaints related to Sexual Harassment. Retaliation against persons who report or provide information about Sexual Harassment or behavior that might constitute Sexual Harassment is also strictly prohibited. Any act of reprisal, including internal interference will result in appropriate disciplinary action. Employees are encouraged to report any conduct that they believe to be retaliatory towards themselves or another Employee. Any Employee found to have been engaging in retaliatory conduct will be subject to disciplinary action up to and including termination.

DEFINITIONS

- “Aggrieved Person” means an Employee, who alleges to have been subjected to Sexual Harassment;
- “Company” means Aequus Limited.
- “Employees” means any person employed at a 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 Company, 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- “Respondent” means a person against whom the Aggrieved Person has made a complaint against Sexual Harassment at Workplace.”
- “Sexual Harassment” is defined as a form of sex discrimination consisting of unwanted sexual advances which includes making an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person harassed; or engage in any other unwelcome conduct of a sexual nature in relation to the person harassed, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated that the person harassed would be offended, humiliated or intimidated including one or more of the following unwelcome acts or behaviour (whether directly or by implication):
 - 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”
- “Presiding officer” means the presiding officer of the Internal Complaints Committee (“ICC”) and shall be a woman employed at a senior level at the workplace amongst the Employees.
- “Workplace” includes the registered office, and every unit of the Company across India or abroad where Company conducts its business.”

SEXUAL HARASSMENT

- Sexual Harassment is emotionally abusive and creates an unhealthy and unproductive atmosphere at the Workplace.
- The following circumstances connected with any act or behavior of Sexual Harassment against a employee may also amount to sexual harassment:
 - i. Implied or overt promise of preferential treatment of his/her employment in the Company ; or
 - ii. Implied or overt threat of detrimental treatment of his/her employment in the Company ;
 - iii. Implied or explicit threat about his/her present or future employment status; or
 - iv. Conduct of any person which interferes with any Employee or creates an intimidating or offensive or hostile work environment for a Employee; or
 - v. Humiliating conduct constituting health and safety problems for any Employee.

INTERNAL COMPLAINTS COMMITTEE (ICC)

- For the purpose of addressing complaints related to the Sexual Harassment, the Company has formed an Internal Complaints Committee (ICC) of the Company comprising of the following members:
 - i. A senior woman Employee of the Company who shall act as the Presiding Officer
 - ii. One member from amongst Employees having knowledge on such matters or; and
 - iii. A senior male Employee of the Company;
 - iv. One member from amongst non-government organizations or associations committed to the cause of women or a person who is familiar with issues relating to sexual harassment.

At all times, at least one half of the total number of members forming the Committee shall be women.

Names of members forming part of the ICC for each Workplace is given in **Annexure A** to this Policy. The same should also be displayed at a conspicuous place in the Workplace.

- Grievances can be raised at the email address: POSH@aequs.com. The responsibilities of the ICC include:
 - i. Overseeing the steps taken by the Company to provide a safe work environment at the Company premises.
 - ii. Dealing with Sexual Harassment complaints and completing the enquiry within least possible time.
 - iii. Providing and ensuring that the Company provides assistance, if Aggrieved Person chooses to file complaint under the Indian Penal Code or any other law for the time being in force.
 - iv. Maintaining the records of the grievances filed etc.
 - v. Periodic conduct of workshops, training and awareness programs on Sexual Harassment
 - vi. Submission of annual report to the Company Entities for each calendar year.

PROCEDURE

1. COMPLAINT

- a. An Aggrieved Person may make a complaint of Sexual Harassment at Workplace to the ICC in writing 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. Provided that where such complaint cannot be made in writing, the Presiding Officer or any member of the ICC will render all reasonable assistance to the Aggrieved Person making the complaint to reduce the same in writing.

The Internal Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period

- b. Where an Aggrieved Person is unable to make the complaint on account of his/her physical or mental incapacity or otherwise, his/her legal heir or such other person may make a complaint.
- c. Without prejudice to the generality of the foregoing, the following are the persons who are eligible to make a complaint:

- (i) In case an Aggrieved Person is unable to make a complaint on account of his/her physical incapacity, a complaint may be filed by her relative or friend; or his/her co-worker; or an officer of the National Commission for Women or State Women's Commission; or any person who has knowledge of the incident, with the written consent of the Aggrieved Person.
 - (ii) In case an Aggrieved Person is unable to make a complaint on account of his/her mental incapacity, a complaint may be filed by his/her relative or friend; or a special educator; or a qualified psychiatrist or psychologist; or the guardian or authority under whose care he/she is receiving treatment or care; or a person who has knowledge of the incident jointly with his/her relative or friend or a special educator or qualified psychiatrist or psychologist, or guardian or authority under whose care he/she is receiving treatment or care;
 - (iii) For any other reasons, a complaint may be filed by any person who has knowledge of the incident, with written consent of Aggrieved Person;
 - (iv) On death, a complaint may be filed by any person who has knowledge of the incident with the written consent of Aggrieved Person's legal heir.
- d. The Aggrieved Person shall submit to the ICC, six copies of the complaint along with supporting documents and the names and addresses of the witnesses.

2. CONCILIATION

- a. At the request of the Aggrieved Person, the ICC may, before initiating enquiry, take steps to settle the matter between his/her and Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- b. Where a settlement is arrived at, the ICC shall record the settlement and forward the same to the Company to take such action as specified in the recommendation.
- c. The ICC shall provide the copies of settlement recorded to the Aggrieved Person and the Respondent.

3. ENQUIRY INTO COMPLAINT

- a. In all other cases, as well as in cases where the Aggrieved Person informs the ICC that the terms or conditions of conciliation have not been complied with by the Respondent, the ICC shall proceed to make enquiry into the complaint.
- b. On receipt of the complaint, the ICC shall send one of the copies received from the Aggrieved Person to the Respondent within a period of seven working days.
- c. The Respondent shall file the reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receiving the copies of complaint.
- d. Quorum for enquiry shall be minimum three (3) members.
- e. The ICC shall have same powers for making enquiry as vested in a civil court when trying a suit for certain matters. The ICC shall make the enquiry in accordance with the principles of natural justice.
- f. The ICC shall, after providing a notice of fifteen days, have the right to terminate the inquiry proceedings or to give an ex parte decision on the complaint, if the Aggrieved Person or Respondent fails, without sufficient cause, to present before the Presiding Officer for three consecutive hearings.

- g. Enquiry shall be completed within 90 days of filing the application. On completion of the enquiry the ICC shall provide a report of its findings to the Aequs. The report shall be made available to the parties concerned.
- h. In case the ICC arrives at the conclusion that the allegation against the Respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.
- i. In case the ICC arrives at the conclusion that the allegation against the Respondent has been proved, it shall recommend to the Company to take action for Sexual Harassment as a misconduct in accordance with the provisions of the service rules applicable to the Respondent. The ICC shall also recommend to the Company to deduct from the Respondent's salary or wages, such sum as it may consider appropriate to be paid to the Aggrieved Person. The ICC shall consider various factors such as mental trauma, pain, suffering and emotional distress caused to the Aggrieved Person, the loss in career opportunities due to the incident of Sexual Harassment, medical expenses incurred by the Aggrieved Person for physical or psychiatric treatment, the income and financial status of the Respondent, feasibility of such payment in lump sum or in installments to determine the sum to be paid to the Aggrieved Person. Where there are no service rules applicable to the Respondent, the ICC shall recommend to the Company to take such action including written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, termination of service, transfer to different location, undergoing counselling session or carrying out community service.
- j. Regardless of the outcome of a complaint made in good faith, the Aggrieved Person or the person lodging the complaint and any person providing information or any witness, shall not be subject to any form of retaliation.
- k. The details of all complaints and information pertaining thereto, including the enquiry shall be kept confidential and shall not be shared to anyone even on an application filed under Right to Information Act, 2005.

4. MALICIOUS COMPLAINTS

- a. This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our Employees have a forum to approach in the event of instances of Sexual Harassment. However, if on investigation, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his image in the Company and to settle personal/professional scores, strict action will be taken against the complainant which may include written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, termination of service, transfer to different location, undergoing counselling session or carrying out community service.
- b. ICC may recommend to the Company to take action against the Employee or the person who has made the complaint in accordance with the applicable service rules if it comes to the conclusion that the allegation against the Respondent employee is malicious or the complaint is filed knowingly to be false or any forged or misleading document is produced to make complaint.
- c. Mere inability to substantiate a complaint or provide adequate proof will not attract action against the complainant and the malicious intent on the part of the complainant is required to be established after an inquiry before recommending any action.

5. TIMELINES

The crucial timelines that should be adhered to, by the Aggrieved Person and the Company with regard to a complaint against Sexual Harassment:

- a. A written complaint has to be filed by the Aggrieved Person (or such other person as stated above) within (3) three months of the date of the incident and in case of a series of incidents, within a period of three months from the date of last incident. The ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months on being satisfied that the circumstances were such that prevented the Aggrieved Person (or other person, as the case may be) from filing a complaint within the said period.
- b. The ICC shall complete the inquiry within 90 days from the date of receipt of the complaint.
- c. The inquiry report has to be issued within 10 days from the date of completion of the inquiry.
- d. Company shall act on the recommendations of the ICC within 60 days of receipt of the Inquiry report.
- e. Appeal against the recommendations of the ICC / non-implementation of the recommendations lies to the appellate authority notified under the Industrial Employment (Standing Orders) Act, 1946 within 90 days from the date of recommendation.

6. INTERIM RELIEF TO AGGRIEVED EMPLOYEE

During the pendency of an inquiry, on a written request made by an Aggrieved Person, the ICC may recommend to the Company the following:

- a. Transfer the Aggrieved Person or the Respondent to any other Workplace; or
- b. grant leave to the Aggrieved Person up to a period of three months apart from available leave as per the prevailing leave policy of the Company or
- c. Restraining the Respondent from reporting on the work performance of the Aggrieved Person.

7. DISSEMINATION OF THE POLICY

A copy of this Policy shall be disseminated among all Employees and all new recruits. If you require any further information / clarifications on the Policy, please contact the HR Department.

VERSION HISTORY

Sr. No	Version	Approved by	Effective Date	Amendment Summary
1	1.0	Board of Directors at its meeting held on May 08, 2025	May 08, 2025	Adopted amended & restated policy