



MANGAL ELECTRICAL INDUSTRIES LIMITED

(Formerly known as Mangal Electrical Industries Private Limited)

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

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I. BACKGROUND

In terms of the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, every organization that has 10 or more employees must constitute an Internal Complaints Committee (the “ICC” or “Complaints Committee” or “Committee”) to receive and redress complaints on sexual harassment at workplace. In order to create and maintain safe work environment, free from sexual harassment for all its employees of ‘Mangal Electrical Industries Limited’ (the “**Company**”), as per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013, the Company has formed the Policy on Prevention of Sexual Harassment at Workplace (hereinafter referred to as the “Policy”).

II. SCOPE

The Company aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any associate during their tenure in the Company towards any other person being an associate of the Company, Client, Vendor and Contractor in Company premises.

III. APPLICABILITY

All associates of Mangal Electrical Industries Limited, India.

IV. DEFINITION

1. **Associate of the Company** - Includes person carrying out any work on behalf of the Company and may have been hired as Full time, Part Time, Probationary or Contractual associates of the Company.
2. **Sexual Harassment** - Harassment of a Female/Male associate consisting of any unwelcome sexually determined behavior, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory.
3. **Aggrieved Women** - In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
4. **Respondent** - Associates against whom the complaint has been filed.

V. POLICY GUIDELINES

Sexual Harassment shall include but not limit to:

- Physical Contact & Sexual advances;
- Demand or request for sexual favors;
- Sexually- colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

VI. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS

A complaint shall be submitted in writing to **posh@mangals.com** or to any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

VII. INTERNAL COMMITTEE

1. Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of:
 - Presiding Officer
 - 1 Member - Head of Department
 - 1 Lady Member (Manager)
 - 1 Lady Member (From NGO or Psychologist or lawyer)
 - 1 Lady Member
2. Within 3 working days, the Internal committee shall commence Official Internal Enquiry:
 - By informing the said complaint to the respondent.
 - By asking an immediate explanation from him/her to the same.
 - By informing not to reach out to the complainant directly or indirectly.
 - By instructing to stop the alleged act of Sexual Harassment immediately.
3. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by the Company in order to stop the alleged act(s)
4. Within 15 days from receipt of the original complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counseling sessions with persons involved in alleged act(s)
5. A complaint will be closed no later than one month from receipt of original complaint by recording the decisions of the internal committee, accordingly informing to the Complainant and the Respondent of the same.

6. Associates are duty bound to assist in investigative steps. Their wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.
7. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she/he may appeal specifying the reasons in writing to Management. Within 5 working days from the receipt, the appeal shall be finally disposed off, by written communication to the said party.

VIII. REDRESSAL

1. An amicable resolution of the complaint is possible only with the written consent of the complainant.
2. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Management.
3. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.
4. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.
5. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,
 - Warning
 - Written apology from offender
 - Bond of good behavior
 - Transfer
 - Debarring from supervisory duties
 - Denial of employee benefits like increments/promotion/salary correction etc.
 - Cancellation of specific work Assignment
 - Suspension
 - Dismissal

Above mentioned redressal process / procedure will be followed, except in matter that are outside the purview of the Company and requires external intervention.

Action for false or malicious complaint or fake evidence:

If 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, then the disciplinary action that shall be commensurate as the case may be, to take action in accordance with the provisions of Redressal (Point VIII).

6. MEETING OF INTERNAL COMMITTEE

The Internal Committee shall meet as any when required. At least one meeting of the Internal Committee shall be held in every financial year. The Internal Committee shall prepare annual report and submit the same to the Board of Directors of the Company which shall include (i) number of complaints filed during the financial year, (ii) number of complaints disposed of during the financial year, (iii) number of complaints pending as on end of the financial year and (iv) such other information as may be required.

7. DISCLOSURE

In terms of the provisions of Section 134 of the Companies Act, 2013 and the Rules made thereunder, the Company shall give a statement in the Directors’ Report that the company has complied with provisions relating to the constitution of Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and in terms of the provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company shall make a disclosure in its Corporate Governance Report annexure to the Directors’ Report in relation to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013:

- number of complaints filed during the financial year
- number of complaints disposed of during the financial year
- number of complaints pending as on end of the financial year.

8. AMENDMENT

The Company reserves its rights to amend or modify this Policy in whole or in part at any time without assigning any reason whatsoever. However, no such amendment or modification would be binding on the Employees unless the same is notified to the Employees in writing.

9. APPROVAL OF NRC POLICY

The Board of Directors in their meeting held on December 11, 2024 approved the Prevention of Sexual Harassment Policy.

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Effective Date: December 11, 2024
Date of approval of Board: December 11, 2024
Version: 01