



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

The Company has constituted an Internal Complaints Committee (the “ICC” or “Complaints Committee” or “Committee”) for the redressal of sexual harassment complaints at the workplace (made by the aggrieved person) and for ensuring time-bound treatment of such complaints.

The Committee comprises of the following members:

- i) A female employee employed at a senior level amongst the employees shall act as Presiding Officer/ Chairperson of the Committee.
- ii) Not less than two members from amongst employees preferably committed to the cause of women OR have experience in social work OR have legal knowledge.
- iii) One external member from amongst non-governmental organisations OR associations committed to the cause of women OR a person familiar with the issues relating to sexual harassment.
- iv) At least one-half of the total members nominated are women.

The Managing Director has the authority to constitute and re-constitute the ICC, from time to time, as may be considered beneficial in the Company's best interest.

The Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the ICC to conduct such enquiries to ensure equal gender representation as the complainant or for any other valid reason.

A quorum of 3 members is required to be present for the proceedings to take place. The quorum must include the Presiding Officer, at least one female member and the external member.

The presiding officer and every member of the ICC shall hold office for such period, not exceeding three years, from the date of their nomination. The presiding officer or any member of the ICC shall be removed from the Committee on the following grounds:

- i) If convicted for an offence or an inquiry into an offence under applicable law for the

time being in force is pending against him/her.

- ii) If found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her.
- iii) Has abused his/her position to render his/her continuance in office prejudicial to the public interest.

The ICC will be responsible for:

- i) Receiving complaints of sexual harassment at the workplace;
- ii) Initiating and conducting an inquiry as per the established procedure;
- iii) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;
- iv) Discouraging and preventing employment-related sexual harassment;
- v) Submitting findings and recommendations of inquiries;
- vi) Coordinating with the employer in implementing appropriate action;
- vii) Maintaining strict confidentiality throughout the process as per established guidelines;

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).

IX. 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.

a. 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:

- 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.

b. 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.

c. APPROVAL OF NRC POLICY

The Board of Directors in their meeting held on January 28, 2026 approved the Prevention of Sexual Harassment Policy.

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Effective Date: January 28, 2026

Date of approval of Board: January 28, 2026