

POSH POLICY

POLICY – PREVENTION & REDRESSAL OF SEXUAL HARASSMENT

1. OBJECTIVE

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, commonly referred to as the 'PoSH Act' is an Indian law enacted with the objective of making workplaces safer, particularly for women by preventing, prohibiting and redressing acts of sexual harassment against them in / at the workplace.

In order to provide the basic rights of gender equality, right to life & dignity, and to carry on any occupation or trade, which includes right to safe environment, free from sexual harassment and abuse at work places with particular reference to working women, the Supreme Court of India has laid down guidelines & norms, to be treated as law and the same is applicable to both public & private sector.

Keeping the above in mind, Ador Welding Limited (hereinafter referred to as "AWL"/"Company") has formulated a Policy on Prevention & Redressal of Sexual Harassment, the objective of which is to prevent and address issues of sexual harassment at workplace. AWL will not tolerate any sexual harassment against any person in the organization (any person includes harassment from men to women or from women to men or from women to women and from men to men).

This policy has prescribed a code of conduct for the employees that will preclude the eventuality of policing employees. All employees are required to be aware of this code and strictly abide by it.

2. SCOPE AND APPLICABILITY

This policy shall cover and be applicable to all the employees working for / in the Company, including part time employees, apprentices and trainees, if any; temporary / outsourced associates (whether engaged directly or through agencies) and those working in an honorary capacity.

This policy would also include individuals on deputation, retainership or consultancy or on contractual employment and visitors.

For the purpose of this policy, all those covered by / under this policy are hereinafter referred to as 'employee(s) or associate(s)'.

3. DEFINITIONS

- a) **Sexual Harassment** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication), but not limited to:
 - i. physical contact and advances ; or
 - ii. a demand or request for sexual favours; or
 - iii. making sexually colored remarks; or
 - iv. showing pornography; or
 - v. any other unwelcome physical, verbal or non-verbal conduct of sexual nature.



Sexual harassment can be in the form of verbal harassment, physical harassment, written / graphic harassment or emotional harassment.

The following circumstances, among other circumstances, if it occur, or is present in relation to or connected with any act or behavior of sexual harassment, may amount to sexual harassment:-

- i. implied or explicit promise of preferential treatment in employment;
- ii. implied or explicit threat of detrimental treatment in employment;
- iii. implied or explicit threat about the present or future employment status;
- iv. interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- v. humiliating treatment likely to affect health or safety.

- b) Aggrieved woman:** In relation to a workplace, means a woman of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- c) Respondent:** A person, against whom a complaint of sexual harassment has been made by the aggrieved person, under this policy.
- d) Complainant:** Any aggrieved person, who makes a complaint alleging sexual harassment under this policy.
- e) Employee:** As defined under scope and applicability of this policy.
- f) Workplace:**
 - i. Premises, locations, establishments, enterprises, institutions, offices, branches or units, and subsidiaries, which are controlled by the Company
 - ii. Places visited by the employee, due to or during the course of employment, including official events, accommodation and transportation, provided by the employer for undertaking a journey
 - iii. Residence in case of employee working from home
- g) Employer:** A person responsible for management, supervision and control of the workplace

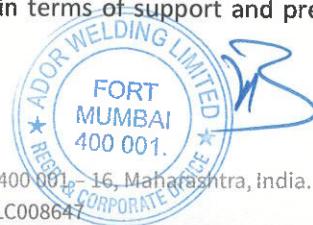
4. CODE OF CONDUCT ON SEXUAL HARASSMENT

No employee / associate shall indulge in the following acts of commission, which will be deemed to be acts of Sexual harassment:

- a) Any uninvited sexual behavior from persons of the same or opposite sex.
- b) Behavior that offends the dignity of the individual, to whom it is directed.
- c) Persons using their positions of power to degrade and humiliate or demand sexual favours.

5. THIRD PARTY HARASSMENT

As per Supreme Court Guidelines, Third Party Harassment occurs as a result of an act or omission by any third party or outsider. The employer and person in-charge will take necessary and reasonable steps to assist the affected person in terms of support and preventive action.



Any of the above acts would tantamount to 'Sexual Harassment', whether it is alleged to have taken place within or 'outside Company Premises'. It shall also be applicable in respect of all allegations of sexual harassment made by an outsider against an employee / associate. Outside the Company Premises refer to any location outside the Company, including locations where an employee / associate may be on tour, customer call, customer interface, hotel for business purposes.

6. SEXUAL HARASSMENT REDRESSAL SYSTEM: Internal Complaints Committee (ICC)

While all employees / associates should adhere to the code of conduct stipulated above, in the unlikely event of any employee / associate violating the same, the Redressal System would be as follows:

- a) To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, ICC has been formed for all administrative units / offices of the Company. The constitution of the ICC may be reviewed every year or as & when necessary.
- b) The details of ICC are notified to all the employees / associates at the workplace. The committee comprises of: Presiding Officer: Will generally be a woman employed at a senior level in the organization or workplace.
- c) Constitution of ICC: 1] At least 2 members from / amongst employees, committed to the cause of women or who have had experience of social work or have legal knowledge. 2] One external member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. 3] At least one half of the total members nominated, shall be women...
- d) The ICC'S scope of duties shall be as under:
 - i. Hear and investigate complaints of sexual harassment.
 - ii. Recommend punitive/corrective action.
 - iii. Make suggestions to improve the work environment.
 - iv. Submit annual report in prescribed format
 - v. The ICC will submit its recommendations to the complainant and respondent, so that the aggrieved party can make an appeal.
- e) Redressal Procedures : After the receipt of the complaint from the aggrieved women / employee, the Presiding Officer and the Committee members need to ensure and assure:
 - i. Confidentiality of the complainant.
 - ii. that every complaint will be taken seriously.
 - iii. information generated should be restricted to the smallest possible group
 - iv. the process is brief and quick
 - v. That the redressal system is retribution free and irrespective of the outcome of the investigation, nothing will be done to denigrate the complainant. The Presiding Officer / Committee members should advise the complainant to register a written complaint. All cases where a written complaint has been made will be put up to ICC.
 - vi. In case the complainant is not willing to give a written complaint because it is not of a serious nature warranting a written complaint, the Presiding Officer /



Committee members will have the following alternate ways to redress the complaint, if the case is found genuine:

- Appoint a mediator or directly communicate to the alleged harasser that his / her behaviour is inappropriate.
- A verbal warning to be given to the alleged harasser.
- vii. In case if the complaint is of a serious nature warranting disciplinary action, if proved, the Presiding Officer / Committee members should insist and assist the aggrieved woman to file a written complaint, on receipt of which the complaint can be put up to the ICC.
- viii. In case of complaints involving offences under the Indian Penal Code, the Presiding Officer / Committee members should advise the complainant to file a complaint with the local police immediately. In these cases, the support of the company in filing the complaint should be ensured. The various offences, that are covered under the Indian Penal Code are narrated below:
 - Violating modesty & Touching Body Parts (Section 354)
 - Vulgar comments (Section 509)
 - Rape and attempt to rape (Section 376 & 376 / 511)
 - Assault (Section 351)
- ix. The procedure for redressing all written complaints will be as under:
 - The ICC will notify in writing, the time and date of the meeting that should be fixed within five working days of receiving the complaint. The complainant and the alleged harasser should be given a written notification to appear before the ICC. It should be ensured that a minimum of 2 working days' notice is given.
 - Along with the notification, a copy of the complaint should be given to the alleged harasser.
 - The ICC, in separate meetings with the complainant and the alleged harasser, will record and investigate into the statements given by them. In addition, the ICC can call for any witnesses / documents / records etc., as are relevant to the case. The ICC will get the individual signatures of the complainant, the alleged harasser and any witnesses, on the statements given by them.
 - Minutes will be taken down / made to record the proceedings and all documents pertaining to the complaint
 - The conclusions of the ICC, along with the recommendations, will be submitted to the HR Head. The Head-HR will implement the recommendations after confirming with / consulting MD.
 - A Copy of the final report along with Annexures / exhibits to be given to both the parties i.e. the complainant and the respondent. In the event that the conclusions of the ICC are unsatisfactory to the complainant or the alleged harasser, an appeal in writing can be made by the concerned party, who is requesting the appeal, to / in the court of law.
 - Copies of the documentation of the ICC proceedings and recommendations should be maintained by the designated member of ICC.

7. Disciplinary Action

- i. Possible disciplinary action will be in direct proportion to the seriousness of the offence and could range from a letter of warning, written apology by the respondent to the complainant, transfer from the present locations / Department / Positions, Demotion, Withholding of Salary, Incentives, bonus or any other



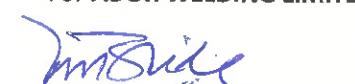
remuneration, Suspension from services (without pay), to even Termination of services.

- ii. In case, after the ICC proceedings, it is concluded that the complaint also constitutes a criminal offence, punishable under the Indian Penal code, it will be the responsibility of the Company to initiate appropriate action. The Company will take action in accordance with the law and the onus of lodging the complaint with the appropriate authority will be with the company.
- iii. The ICC will make available the proceedings of the investigation and the minutes of the meetings to the police or prosecution, that / which would be evidence to oppose bail, or to frame charges or during the trial. Members of the ICC are free to testify at the trial on a voluntary basis.
- iv. In the cases where a false complaint (evidence available that complaint is fake) has been filed and the investigation has proved that the intention of the complainant was purely to defame the alleged harasser or malafide in intent, disciplinary action will be taken against the complainant, which could range from a letter of warning, written apology by the respondent to the complainant, transfer from the present locations / Department / Positions, Demotion, Withholding of Salary, Incentives, bonus or any other remuneration, Suspension from services (without pay), to even Termination of services.
- v. In case of false witness statements, disciplinary action must be taken against such employee (false witness), which could range from a letter of warning, written apology, transfer from the present locations / Department / Positions, Demotion, Withholding of Salary, Incentives, bonus or any other remuneration, Suspension from services (without pay), to even Termination of services.
- vi. **Breach of Confidentiality:** If any ICC member or any employee, associate, parties are involved in any action, which violates / breaches any Clause mentioned in POSH Policy, disciplinary action will be taken against the employee, which could range from a letter of warning, written apology, transfer from the present locations / Department / Positions, Demotion, Withholding of Salary, Incentives, bonus or any other remuneration, Suspension from services (without pay), to even Termination of services.

8. Evaluation

This Policy may be periodically reviewed, in order to incorporate certain / any required changes / amendments, and also as may be recommended by the ICC / Redressal Committees, based on their experience of dealing with the Complaints.

For ADOR WELDING LIMITED,



VINAYAK M. BHIDE

HEAD – HUMAN RESOURCES

Date: January 08, 2026



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ANNEXURE 1 - Constitution of the Internal Complaints Committee

Name	Designation in ICC	Date of Appointment	Contact Details	Location
Jaya Pradeep Raj	Presiding Officer	01-Jan-26	jayaraj@adorians.com	Chinchwad Plant
Jyotsna Datar	External Member	01-Apr-25	suraksha@adorians.com	All
Nidhi Jaiswal	Member	01-Jan-26	nidhijaiswal@adorians.com	Chinchwad Plant
Rajkumar H. Vishnoi	Member	01-Jan-26	rajkumarvishnoi@adorians.com	Chinchwad Plant
Geetha Srinivas	Member	01-Jan-26	geethasrinivas@adorians.com	Chinchwad Plant
Ashutosh A. Nimbkar	Member	01-Jan-26	aanimbkar@adorians.com	Head Office
Prachi Ashish Dhoke	Member	01-Jan-26	prachidhoke@adorians.com	Head Office
Shruti Salvi	Member	01-Jan-26	shrutisalvi@adorians.com	Head Office
Gainda Lal Verma	Member	01-Jan-26	glverma@adorians.com	Raipur Plant
Pratiksha Ramteke	Member	01-Jan-26	pratiksharamteke@adorians.com	Raipur Plant
Chandrakant Sahu	Member	01-Jan-25	chandrakantsahu@adorians.com	Raipur Plant
Suraj Pol	Member	01-Jan-26	surajpol@adorians.com	Silvassa Plant
Sakshi Jasoria	Member	01-Jan-26	sakshijasoria@adorians.com	Silvassa Plant
Niki Singh	Member	01-Jan-26	nikisingh@adorians.com	Head Office
Nayana Rane	Member	01-Jan-26	nayanarane@adorians.com	Chinchwad Plant
Manjula Bai Shivaji	Member	01-Apr-25	manjulabs@adorians.com	Bengaluru Plant
Kalpana Phalak	Member	01-Apr-25	kalpanap@adorians.com	Nagpur Plant



ANNEXURE 2 – Process Flow for Redressal in case of Sexual Harassment

