

 KSHEMA Dependability: end to end.	KSHEMA POWER INDIA PRIVATE LIMITED	Doc. No.	IMS/P/019
		Rev. No.	02
		Rev. Date	12/11/2025
		Issue No.	02
		Issue Date	16/12/2025
INTEGRATED MANAGEMENT SYSTEM- POSH POLICY			
ISO 9001:2015, ISO 14001:2015 & ISO 45001: 2018			

Preface

This PoSH policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and the Rules (hereinafter referred to as “the Act”) framed thereunder.

The Policy on Prevention of Sexual Harassment of women at workplace intends to provide protection against sexual harassment of women at workplace and the prevention and redressal of complaints of sexual harassment and matters related to it.

Kshema Power India Pvt Limited is committed to providing a working place that is free from sexual harassment and all forms of intimidation or exploitation. The Company shall provide healthy working environment that enables employees to work without fear of prejudice, gender bias, sexual harassment and all forms of intimidation or exploitation.

We believe that all stakeholders, irrespective of their gender, have the right to be treated with dignity. We recruit competent and motivated people who respect our values, provide equal opportunities for their development and advancement; protect their privacy and do not tolerate any form of harassment or discrimination.

The Policy shall apply to all the offices of the Company across various states from time to time as applicable. However, separate Committees may be constituted at each such offices subject to availability of female employees in the respective offices. However, if any such office is not in a position to constitute a Committee in compliance with the Act, then the existing Committee of any other office can render the necessary support as and when required.

History and Amendments:

This Prevention of Sexual Harassment (PoSH) policy was initially adopted by the company in 2014, reflecting our commitment to a safe and respectful workplace. In alignment with the evolving legal landscape, the policy was rephrased in 2016 to incorporate the amendments introduced by the Repealing and Amending Act, 2016 (No. 23 of 2016), dated 6th May 2016. These amendments were included to ensure that the policy was fully compliant with the latest legislative requirements. **Kshema Power India Pvt Limited PoSH Policy 2023**

Furthermore, during the reconstitution of the Internal Committee (IC) in 2017,2020 and 2023 the policy underwent a thorough review and was reaffirmed to guarantee its continued relevance and compliance with legal standards, as well as to adapt to the company’s growing organizational needs.

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Definitions and Interpretations

1. Sexual Harassment

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

a) Any unwelcome sexually determined behavior, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behavior or conduct was directed namely:

i. Physical contact and advances;

ii. Demand or request for sexual favors;

iii. Sexually colored remarks or remarks of a sexual nature about a person's clothing or body;

iv. Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS and any other digital forms;

v. Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;

vi. Giving gifts or leaving objects that are sexually suggestive;

vii. Eve teasing, innuendos and taunts, physical confinement against one's will or any such act likely to intrude upon one's privacy;

viii. Persistent watching, following, contacting of a person; and

ix. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

b) The following circumstances if it occurs or is present in relation to any sexually determined act or behavior amount to sexual harassment: **Kshema Power India Pvt Limited PoSH Policy 2023**

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 her health or safety.

Sexual harassment may occur not only where a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that employee deals with in the course of his/her work who is not employed by the Company.

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.

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1. Aggrieved Party

Any person, whether employed or not, who alleges to have been subjected to an act of sexual harassment by the respondent. This would include visitors or guests at the workplace.

1. Respondent

A person against whom the aggrieved party has made the complaint.

1. Employee

A 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 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 co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

1. Workplace

In addition to the place of work 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 **Kshema Power India Pvt Limited PoSH Policy 2023**

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

1. Employer


A person responsible for management, supervision and control of the workplace.

Internal Committee* (Henceforth mentioned as Committee)

Internal Committee (IC) is a mandatory Committee that every employer is required to constitute within his/her organization. The Committee is required to be vigilant to redress the sexual harassment complaints and resolves the same ASAP. IC is the sole authority to inquire about the complaints and make efforts to redress the same.

The Committee must comprise of:

- i) Presiding Officer:** The presiding officer must be a woman employed at a senior level in the organization or workplace to work according to the Internal Committee Policy.
- ii) External Member:** The external member of the Committee must be selected from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

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iii) Internal Members: At least 2 Internal Committee members must be selected from among the employees who are committed to the cause of women or who have had the experience of social work or have legal knowledge.

iv) 50% Women: At Least one-half of the total members nominated to the Committee must be women.

Composition of Committee in Kshema Power India Pvt Ltd

Given the technical nature of the Company's work and the absence of female employees, the Company has taken steps to ensure that the IC is properly constituted. Accordingly, two female members from the Company's sister concern, who meet the eligibility criteria prescribed under the Act, has been nominated to act as the Internal Members of the IC.

The Committee is responsible for the following:

1. Receiving complaints of sexual harassment at the workplace

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- i. Initiating and conducting inquiry as per the established procedure
- ii. Submitting findings and recommendations of inquiries
- iii. Coordinating with the employer in implementing appropriate action
- iv. Maintaining strict confidentiality throughout the process as per established guidelines
- v. Submitting annual reports in the prescribed format

Reconstitution of the Internal Committee:

The Internal Complaints Committee (IC) shall be reconstituted every three years in accordance with the POSH Act, 2013.

The process will begin three months before the current IC's term ends, ensuring continuity.

New/ existing members shall be appointed/reappointed from time to time as per legal requirements, maintaining gender balance and expertise.

Interim vacancies will be filled as needed to ensure the IC remains functional.

The Committee is reconstituted as stated in Annexure I

Raising a Complaint

The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the Committee members at the workplace.

The complaint must be lodged within **3 months** from the date of incident / last incident. The Committee can extend the timeline by another **3 months** for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.

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Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Committee shall render all reasonable assistance to the women for making the complaint in writing. If the aggrieved woman is unable to lodge the complaint in account of her incapacity, the following may do so on her behalf, with her written consent.

- i. Legal heir, relative or friend
- ii. Co-worker
- iii. Any person having the knowledge of the incident

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If the initial complaint is made to a person other than a Committee member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the Committee immediately.

The complaint can be submitted to the Committee electronically to **any of the following email ids:**

- (1) posh@skshemapower.com
- (2) Deepika.j@kshemapower.com

Receiving a Complaint

Dealing with incidents of harassment is not like any other type of dispute. Complainants may be embarrassed and distressed and it requires tact and discretion while receiving the complaint.

The following points are kept in mind by the receiver of the complaint:


- Complaints are to be listened to first.
- The complainant shall be informed that the Employer takes the concerns seriously.
- Complainant is informed that her concerns will be reported to the Committee and follow up will be done speedily. A general awareness about the Committee may be created to instill confidence.
- Situation are not be pre-judged. Written notes are taken while listening to the person.
- Complainant is allowed to bring another person to the meeting if she wishes. When taking accurate notes, complainants own words, where possible, is used.
- Clear description of the incident in simple and direct terms is prepared and details are confirmed with the complainant.
- All notes are kept strictly confidential. Complainant's agreement is taken to allow proceeding with the matter, which involves a formal investigation.

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- The complainant is advised that although the process is confidential, the respondent needs to be informed and any witnesses and persons directly involved in the complaint process will also learn of the complainant's identity.
- Care shall be taken to prevent any disadvantage to or victimization of either the complainant or the respondent

The Redressal Process:

Conciliation

- Prior to initiating an inquiry, the Committee may, at the request of the Complainant take steps to settle the matter between the Complainant and the Respondent through conciliation, provided that no monetary settlement is made the basis of such conciliation.
- In case a settlement has been arrived at the Committee shall record the settlement so arrived and forward the same to the Employer to take action as specified in the recommendation of the Committee.
- However, Committee will have authority to decide if a conciliation is appropriate, Committee will have right to not take cognizance of the conciliation request by the Complainant.
- In case a settlement is arrived at, the Committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation is to happen within 2 weeks of receipt of complaint. 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.

Inquiry Process:

Conducting Inquiry

The Committee initiates inquiry in the following cases:

- No conciliation is requested by 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

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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.

Manner of inquiry into complaint:

- Complainant should submit the complaint along with supporting documents and the names of the witnesses, if any.
- The Committee will hold a meeting with the Complainant within seven days of receipt of the complaint, but no later than a week in any case.

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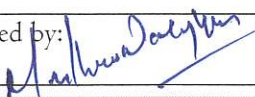
- At the first meeting, the Committee members shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate her complaint.
- The Committee shall proceed with the enquiry and communicate the same to the Complainant and Respondent.
- Upon receipt of the complaint, the Committee will send 1 copy of the complaint to Respondent within 7 working days of receiving the complaint.
- Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- Thereafter, the Respondent may be called for a deposition before the Committee and an opportunity will be given to him to give an explanation, where after, an inquiry shall be conducted and concluded.
- The Complainant shall be provided with a copy of the written explanation submitted by the Respondent.
- 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.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and the Respondent for putting forward and defending their respective case.
- If either party desires to tender any documents by way of evidence before the Committee, the same is to be supplied as original copies of such documents. Signatures should be affixed on the respective documents to certify these to be original copies.
- No legal practitioner can represent any party at any stage of the inquiry procedure
- The Complaints Committee is to make inquiry into the complaint in accordance with the principles of natural justice
- In conducting the inquiry, a minimum of three Committee members including the Presiding Officer are to be present **Kshema Power India Pvt Limited PoSH Policy 2023**
- The employer shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy

Interim relief

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

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

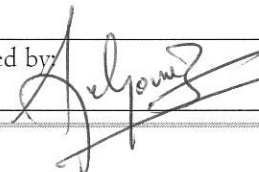
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Termination of Inquiry

Committee may terminate the inquiry or give ex-parte decision, if complainant or respondent respectively is absent for 3 consecutive hearings, without sufficient reason. 15 day written notice is to be given to the party, before termination of enquiry or ex-parte order.

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.

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 **Kshema Power India Pvt Limited**

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- A copy of the proceedings was 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.

Complaint unsubstantiated

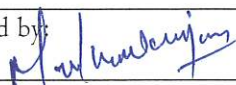
Where the Committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter. Further, the Committee ensures that both parties understand that the matter has been fully investigated, that the matter is now concluded and neither will be disadvantaged within the Company.

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:

- Counseling
- Censure or reprimand
- Apology to be tendered by respondent
- Written warning
- Withholding promotion and/or increments

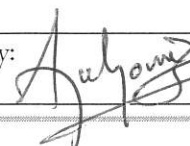
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- Suspension
- Termination
- Or any other action that the Management may deem fit.

The employer / Company acts upon the recommendations within 60 days and confirm to the Committee. Post implementation of the actions, follow up with the complainant should occur to ascertain whether the behavior has in fact stopped, the solution is working satisfactorily and if no victimization of either party is occurring. This follow up should be undertaken by the complainant's Manager supported by HR.

Penal Consequences of Sexual Harassment Kshema Power India Pvt Limited PoSH Policy 2023

In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the employer, for making a Police Complaint. Under the Indian Penal Code, (IPC), which deals with Sexual Harassment has made this a 'cognizable offense' i.e. a person charged with Sexual Harassment may be arrested without a warrant.

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.

While deciding malicious intent, the Committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

Confidentiality

The identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of inquiry process, recommendations of the Committee, action taken by the employer is considered as confidential materials, and not published or made known to public or media.

Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the act.

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, within 90 days of the recommendations being communicated.

Amendments

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules/regulations that come into effect from time to time, related to Sexual Harassment. **Kshema Power India Pvt Limited PoSH Policy 2023**

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Annual reports

The Internal Committee (IC) shall prepare and submit an Annual Report to both the employer and the District Officer, as per Section 21 of the Act, every year containing the following details:-

- Number of complaints of sexual harassment received in a particular year.
- Number of complaints of sexual harassment disposed-off during a particular year.
- Number of cases pending for more than 90 days.
- Number of workshops/ awareness programs conducted for prevention of sexual harassment at workplace.
- Nature of action(s) taken by the employer

ANNEXURE I

Constitution of Internal Committee (IC)

Presiding Officer	Ms.Deepika
External Member	Ms.Aspy
Member	Ms.Divya Shekar
Member	Mr. R. Venkatesan