



## POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) ESAB INDIA LIMITED

### I. Preamble

ESAB India Limited is an equal employment opportunity Company and is committed to creating and maintaining a secure work environment where its employees, workers, interns, apprentices, contract labour, agents, vendors and business partners can work and pursue business together in an atmosphere free of harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the Company's business. The Company also believes that all employees, workers, interns, apprentices, contract labour, agents, vendors and business partners of the Company have the right to be treated with dignity. We have zero-tolerance for sexual harassment. We value every employee and each business associate working with us and wish to protect their self-respect and dignity.

### II. Scope of the Policy

1. The Policy extends to all employees, workers, interns, apprentices, contract labour, contractors, sub-contractors, vendors, customers and any third party who has business association with the Company.
2. The Policy covers all incidents occurring not only in the workplace but also in work-related settings outside the office viz. business trips, office parties, client meetings, etc.

### III. Objectives of the Policy

1. The objective of the policy is to provide protection against sexual harassment in workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith regardless of gender.
2. The Company is determined to promote a working environment in which people of all genders complement each other as equals that encourage maximum productivity and maintain their personal dignity.

### IV. Definitions

**Aggrieved person** in relation to a workplace means, a person, of any age, whether employed or not, includes contractual, temporary, visitors, who alleges to have been subjected to any act of sexual harassment by the Respondent.

**Complainant** means any aggrieved person, who makes a complaint alleging sexual harassment under this policy and The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

**Employee** refers to a person employed at a workplace for any work on regular, temporary 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, contract worker, probationer, trainee, apprentice or called by any other such name.

**Employer** means person(s) responsible for management, supervision and control of the workplace representing the Company.

**Respondent** means a person against whom a complaint of sexual harassment has been made by the aggrieved person.

**Sexual harassment** includes any one or more of the following unwelcome acts or behaviour whether directly or by implication, but not limited to:

- i) physical Contact and advances. or
- ii) a demand or request for sexual favors; or
- iii) making sexual colored remarks; or
- iv) showing pornography; or
- v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, among other circumstances, if it occurs 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 or preference treatment in your employment
- ii) Implied or explicit threat of detrimental treatment in your employment
- iii) Implied or explicit threat about your present or future employment status
- iv) Interference with your work or creating an intimidating or offensive or hostile work environment for you; or
- v) Humiliating treatment that is likely to affect your health or safety – both physical and psychological.

**Workplace** includes the following:

- i) Premises, locations, establishments, enterprises, institutions, offices, branches or units of the Company 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 of the employee in case of employee working from home.

#### **V. Code of Conduct**

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

- i) Any uninvited sexual behaviour from persons of the same or different gender.
- ii) Behaviour that offends the dignity of the individual, to whom it is directed.
- iii) Persons using their positions of power to degrade and humiliate or demand sexual favours.

#### **VI. Constitution of Internal Complaints Committee (ICC)**

The employer of a workplace shall constitute a Committee to be known as “Internal Complaints Committee”. The Internal Complaints Committee shall comprise of the following members subject to one-half of the total members so nominated shall be women:

- i) A Presiding Officer who shall be a woman at workplace or from other offices or administrative units.
- ii) Not less than one member preferably committed to the cause of women’s rights or who have had experience in social work or have legal knowledge.
- iii) One member from non-governmental organisations or associations committed to the cause of women’s rights or a person familiar with the issues relating to sexual harassment.

The Internal Complaints Committee of the Company for the workplaces are as below:

Sl. No.	Name of the person	Designation in ICC	Contact details	Workplace
1	Ms. Mohanapriya	Presiding Officer	Email: <a href="mailto:mohana.priya@esab.co.in">mohana.priya@esab.co.in</a> Mobile: + 91 97900 15304	Ambattur Office, Chennai
2	Ms. Rachel Browning	NGO Member	Email: <a href="mailto:raystonez@gmail.com">raystonez@gmail.com</a> Mobile +91 98843 41877	External
3	Ms. Chaithanya Lakshmi	Member	Email: <a href="mailto:chaithanya.lakshmi@esab.co.in">chaithanya.lakshmi@esab.co.in</a> Mobile: +91 80728 21672	Head Office, Chennai
4	Ms. Sheeba S	Member	Email: <a href="mailto:sheeba.s@esab.co.in">sheeba.s@esab.co.in</a> Mobile: +91 80151 58561	Head Office, Chennai
5	Ms. Sangeetha	Member	Email: <a href="mailto:sangeetha.vcare@esab.co.in">sangeetha.vcare@esab.co.in</a> Mobile: +91 78718 50754	IGT Factory, Sriperumbudur
6	Mr. Nageswaran S	Member	Email: <a href="mailto:nageswaran.s@esab.co.in">nageswaran.s@esab.co.in</a> Mobile: +91 95000 19957	IGT Factory, Sriperumbudur
7	Ms. Ipsita Acharya	Member	Email: <a href="mailto:ipsita.acharya@esab.co.in">ipsita.acharya@esab.co.in</a> Mobile : +91 96743 82643	Kolkata Office
8	Mr. Joydeep Roy Chowdhury	Member	Email: <a href="mailto:joydeeproy.chowdhury@esab.co.in">joydeeproy.chowdhury@esab.co.in</a> Mobile: +91 9831853935	Kolkata Office
9	Mr. Krish Karthikeyan	Member	Email Id : <a href="mailto:Karthikeyan.krish@esab.co.in">Karthikeyan.krish@esab.co.in</a> Mobile : +91 98409 94701	Ambattur Office, Chennai
10	Mr. Amit C	Member	Email: <a href="mailto:amit.chhugani@esab.co.in">amit.chhugani@esab.co.in</a> Mobile: +91 90213 60819	Nagpur Factory
11	Mr. Ashish Gangane	Member	Email: <a href="mailto:ashish.gangane@esab.co.in">ashish.gangane@esab.co.in</a> Mobile: +91 98906 77883	Nagpur Factory

The members of the Internal Complaints Committee shall hold office for a period of three years. The Company shall rotate the members of the Committee once in every three years except the external member. In the event of any member resigns or leaves the Company for any reason, the Company shall induct a new member in lieu of the exiting member to ensure that fifty percent of the composition of the Committee remains woman members.

The members of the ICC Committee shall meet twice a year either virtually or through physical mode and review the level of awareness being created among the employees regarding POSH policy and its compliances. The minutes of the ICC Committee meeting may be circulated to the members of the Audit Committee and Board for their information.

#### **VII. Powers and Responsibilities of the Internal Complaints Committee**

The Internal Complaints Committee has quasi-judicial powers similar to civil court in relation to conduct of inquiries, summoning witnesses, enforcing attendance of any person and examining them under oath, and recommend disciplinary or remedial action against the perpetrators of workplace sexual harassment.

The responsibilities of the Internal Complaints Committee are as follows:

- i) To receive complaints on sexual harassment at the workplace;
- ii) To initiate and conduct inquiry as per the established procedures;
- iii) To submit findings and recommendations of inquiries to Employer;
- iv) To maintain strict confidentiality throughout the process;
- v) To submit annual reports in the prescribed format;

#### **VIII. Duties of Employer**

The following are the duties of the Employer under the Act:

- i) to provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- ii) to display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the Internal Committee.
- iii) organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the Internal Committee in the manner as may be prescribed;
- iv) to provide necessary facilities to the Internal Committee for dealing with the complaint and conducting an inquiry;
- v) to assist in securing the attendance of respondent and witnesses before the Internal Committee; to provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;
- vi) to cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;

#### **IX. How to approach ICC & Process for lodging complaint**

Any Aggrieved Person or any other person representing the Aggrieved Person can reach out to the Presiding Officer or any member of the Committee by sending e-mails to ICC members or calling them on their mobile numbers for registering their complaints or any grievances covered under this Policy.

The following process needs to be followed by Aggrieved Person while making any complaint under this policy:

- i) Aggrieved person needs to submit a written complaint, along with any documentary evidence available or name of witness, to any of the committee members at the workplace.
- ii) The written complaint must be lodged within three (3) months from the date of incident/ last incident. The Committee can extend the timeline by another three (3) months for reasons recorded in writing, if satisfied that these reasons prevented the Aggrieved person from lodging the complaint.
- iii) If such complaint cannot be made in writing, the Presiding Officer or any Members of the Committee shall render all reasonable assistance to the person for making the complaint in writing.
- iv) If the aggrieved person is unable to lodge the complaint on account of incapacity, the following may do so on their behalf, with their written consent
  - Legal heir, relative or friend, or
  - Any Co-worker, or
  - Any person having the knowledge of the incident.
- v) 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

## **X. Resolution through Conciliation**

- i) The Committee, before initiating the inquiry, at the request of Aggrieved person take steps to settle the matter between the aggrieved person and the Respondent through conciliation. However, no monetary settlement shall be made as a basis of conciliation.
- ii) In case a settlement is arrived at, the Committee shall record & report the same to the Employer for taking appropriate action. The Conciliation process shall be completed within a period not exceeding two (2) weeks from the date of request for initiation of conciliation proceedings.
- iii) Once the matter has been resolved through Conciliation, the Committee shall provide copies of the settlement to Aggrieved person & Respondent. Once the action is implemented, no further inquiry is conducted.
- iv) Notwithstanding the settlement mentioned in section (iii) above, if the Aggrieved person informs the Committee that any terms or conditions of the settlement so arrived, has not been complied with by the Respondent, the Committee shall proceed to make an inquiry into the complaint in accordance with this policy or, if required, forward the complaint to the police.

## **XI. Inquiry process**

- i) On receipt of written complaint from Aggrieved Person or from any person representing Aggrieved Person, the Committee shall initiate inquiry in the following cases;
  - If no conciliation is requested by aggrieved person; or
  - If conciliation has not resulted in any settlement; or
  - Aggrieved Person informs the Committee that any terms and conditions of the settlement arrived through conciliation, has not been complied with by Respondent.
- ii) The Committee shall proceed to make an inquiry into the complaint within a period of one (1) week a) from the date of receipt of written complaint; or b) from the date closure of conciliation; or c) from the date of non-compliance of the conciliation terms & conditions subject to evidential proof.
- iii) The Aggrieved person shall at the time of filing the complaint, submit to the Committee, Six (6) copies of the complaint along with supporting documents and the names and addresses of the witnesses.
- iv) Upon receipt of the complaint, the Committee shall send one of the copies of the complaint received to the Respondent within a period of seven (7) working days.
- v) The Respondent shall file his reply to the complaint along with all supporting documents, names and addresses of witnesses within ten (10) working days from the date of receiving the copy of the complaint along with the supporting documents.
- vi) No legal practitioner can represent any party at any stage of the inquiry procedure.
- vii) The Committee shall make inquiry into the complaint in accordance with the principles of natural justice.
- viii) In conducting the inquiry, a minimum of three (3) committee members including the Presiding Officer shall be present.

## **XII. Interim Relief**

If the Complaint is found to be genuine during the investigation process, the following actions may be taken:

- i) The Company may transfer the complainant or the respondent to another department or location
- ii) Providing any other relief that may help ensure dignity and safety, such as adjusting reporting structures or work-from-home options.

## **XIII. Report submission**

The Committee shall submit its report containing the findings and recommendations to the Employer, within ten (10) days of completion of the inquiry and such report is to be made available to concerned Parties. The findings and recommendations are reached from the facts established and are recorded accurately.

## **XIV. Malicious complaint**

Where the Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved person or any other person making the complaint has made the complaint knowing it to be false or has produced any forged or misleading document, it may recommend to the Employer to take action against 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. Where the Committee arrives at the conclusion that during the inquiry any witness has given false evidence or produced any forged or misleading document, then action shall be taken against witness.

## **XV. Confidentiality**

The identity of the Aggrieved person, Respondent, Witnesses, Statements and other evidence obtained during inquiry process, recommendations of the committees, action taken by the Employer is considered as confidential materials and not published or made known to public or media or any other members of the organization. Any person contravening the confidentiality clauses is subject to disciplinary action as prescribed in the Act.

## **XVI. Monitoring and Review**

The Committee shall monitor the implementation of this policy and submit an annual report to the Board of Directors, as required under the POSH Act. This policy shall be reviewed periodically, and any amendments shall be approved by the Board of Directors.

**Rohit Gambhir**  
**Managing Director**

Reviewed & Approved on 27<sup>th</sup> May 2026