



# Prevention of Sexual Harassment of Women at Workplace – Policy (POSH)

**Force MTU Power Systems Private Limited**  
**A Joint Venture of Force Motors and Rolls-Royce**

Prevention of Sexual Harassment of Women at Work place – Policy –Version 4

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## 1. Applicability:

This policy is applicable to all individuals employed by the Company, either in India or outside the Country.

Force MTU Power Systems Private Limited. (hereinafter referred to as the 'Company'), believes in equal employment opportunity for all its employees in furtherance of which the Company is anchoring this policy against Sexual Harassment.

While adopting a zero-tolerance attitude against any kind of violence or gender discrimination caused or perpetrated during the tenure with and in course of employment with the Company towards employees of the Company, either in India or outside the country, the Company seeks to create and maintain a safe work environment, free of Sexual Harassment, hostility, retaliation and discrimination.

It is important to remember that cultural and social norms vary from country to country. Actions which may be considered acceptable in one location may be considered offensive or inappropriate in another. As an employee of a large, global company have a responsibility to be culturally aware – particularly when travelling or working abroad.

## 2. Definitions:

- a) Employee of the Company includes person hired as Permanent, Temporary or on Retainer-ship basis, Part-Time basis directly or indirectly by the Company.
- b) Offices of the Company: Includes all the offices of the Company in India and outside India.
- c) Sexual Harassment of an employee consists of any unwelcome sexually determined behavior whether directly, overtly or by implication, by any person in charge of the management or a co-employee either individually or in association with other persons using the own authority to exploit the sexuality or sexual identity of a subordinate/superior employee or a co-worker to harass the person in a manner which prevents or impairs their full utilization of employment benefits, facilities or opportunities or any other behavior which is generally considered to be derogatory.

Sexual Harassment shall include but not be limited to:

- i. Physical harassment such as unwanted physical contact and advances, suggestive sexual indecent physical conduct, isolating, cornering, trapping or blocking pathway, stalking, lurid stares, excessively lengthy handshakes, fondling, intentional touching, pinching, pushing, grabbing, brushing past someone, invading their personal space, exhibition of pornography or objects, exposure of organs, molestation, more serious forms of physical or sexual assault, rape.

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- ii. Verbal and gesture harassment such as a demand or request for sexual favors, suggestive or sexually colored remarks / comments / jokes / display of sound, obscene or repeated phone calls, humiliating and/or abusive and/or derogatory speech, Sexual Harassment propositions / innuendoes / slurs / threats, forms of address like 'honey / darling / sweetheart' 'babe'.
  - iii. Written or graphic harassment such as sending or displaying material that is sexually explicit or suggestive, and that some people may find offensive (may include emails, text messages, letters, notes, memos, newspapers, calendars, magazines, video clips and images sent by mobile phone or posted on the internet).
  - iv. Emotional or psychological harassment such as any act of Sexual Harassment nature that has the purpose or effect of –
    - Interfering with and adversely affecting an employee's concentration, work performance, productivity, presence, availability, any other employment opportunities; and/or
    - Creation of unhealthy, unsafe, intimidating, coercive, humiliating and hostile work environment.
- d) Tenure of employment of a person with the Company means the entire period from when an employee joins the Company anywhere in the globe and will continue till the employee's date of relieving. No person who has already been relieved from the services of the Company shall be deemed to be an employee merely because the clearance formalities or full and final settlement has not been completed.

Capitalized term used but not defined in herein shall have the respective meaning given to them in The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and any amendments thereof.

### **3. Scope of policy against Sexual Harassment:**

This policy shall be applicable to all complaints of Sexual Harassment made:

- i. by an employee of the Company against an employee of the Company working within or outside of India;
- ii. by an employee of the Customer or Client Company of the Company against an employee of the Company working within or outside of India;
- iii. by an employee of the Company against an outsider, visitor, professional or consultant who may have caused Sexual Harassment to him/her during the course of his/her employment and within the premises of offices, in India or outside the country, of the Company.

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- iv. by any person against an employee of the company working within or outside of India only if the act of Sexual Harassment occurred during the course of employment and within the premises of offices, in India or outside of the country, of the company.

#### 4. Awareness

Committee members shall arrange to conduct classes [awareness sessions] periodically at regular intervals, to ensure all are aware for the policy and relevant details.

#### 5. Grievance Mechanism:

##### a. Procedure for registering complaints

- i. A complaint, and on-going / continued acts of Sexual Harassment in furtherance to the original complaint, shall be submitted in writing to the Head or any member of the Scrutiny Committee mentioned hereinafter within three months from the date of occurrence of an act of Sexual Harassment. Delay in written submission due to confinement; traveling or any exceptional contingency be condoned.
- ii. A complaint should include the details of occurrence of an act of Sexual Harassment such as name and designation of the accused, other concerned employee(s), date, time, venue, witnesses, description of act, etc. Missing this level of detail does not release the Company from investigation of the case.
- iii. No specific format of complaint is required to be submitted.

##### b. Enquiry procedure

Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by a Scrutiny Committee consisting of

1. Ms. Shilpa Shreedhar Amage, Chairperson
2. Mr. Sachin Ranmode, Member
3. Ms. Shital Datta Pawar, Member
4. Ms. Geetanjali Thakkar, Member
5. Adv. Mrs. Anuja Terkar -External Member-NGO

- i. Ms. Meghana Bivre shall be the designated person of authority responsible for all communications in this regard.
- ii. Within 3 working days from receipt of a complaint, the Scrutiny Committee shall commence an

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official inquiry—

- by informing about the said complaint to the accused and/or the Company Client or Customer Company as the case may be;
  - by instructing him/her to stop the alleged act or any other act defined to be Sexual Harassment, and
  - by asking an immediate explanation from him/her to the same.
- iii. Within five working days from receipt of the original complaint, the designated person shall respond in writing to the complainant informing her/him about the initial steps taken by the Company in order to stop the alleged act(s).
- iv. Within six working days from receipt of the original complaint, the Scrutiny Committee shall record and accordingly communicate in writing to the complainant and the accused, its prima facie findings or charges in the matter, 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 the alleged act.
- v. Unless for some compelling reasons, a complaint shall be finally disposed off no later than one month from receipt of the original complaint by recording the decision of the Scrutiny Committee, accordingly informing to the complainant and the accused of the same.
- vi. All employees of the Company are duty bound to assist in the investigative steps, and the **required employees' wholehearted participation shall be mandatory in this regard.** Whistleblowers shall be protected from exposure, retaliation or hostility.

**6 (a) Redressal:**

- i. Within 24 hours of the closing of the case file, the Scrutiny Committee shall present the same to and inform its decision to the Chief Executive Officer of the Company.
- ii. In case of a decision establishing an offence of Sexual Harassment of the complainant, within three working days, the Chief Executive Officer of the Company through Human Resource (HR) of the Company shall initiate a disciplinary action against the offender considering the nature and extent of injury caused to the complainant, the impact of the offence on the Company profile as a whole, the position of the harasser, prior complaints or repetition of offence, etc.
- iii. The disciplinary action that shall be commensurate with the nature and gravity of the offence, shall include but not limited to, warning, written apology, bond of good behavior, adverse suspension, dismissal or any other relevant reprimand.
- iv. In case of a decision establishing an offence of Sexual Harassment of the complainant against an accused as specified in Clause 3 (a) (iii) herein, the Chief Executive Officer of the Company

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through HR shall immediately initiate an action by making a complaint with the appropriate authority at the Client or Customer of the Company.

- v. An amicable resolution of the complaint is possible only with the written consent of the complainant.

**6 (b) Punishment for false or malicious complaint and false evidence:**

- (1) When the allegation against the accused is malicious or the complainant has made the complaint knowing it to be false or the complainant has produced any forged or misleading document, the complainant be liable for appropriate disciplinary action by the Company. Provided that a mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant. Provided further that the malicious intent on part of the complainant shall be established before taking any disciplinary action against the complainant.
- (2) When any witness has given false evidence or produced any forged or misleading document, the Company may take disciplinary action against the said witness. Provided that the false evidence or production of any forged or misleading document by the witness shall be established before taking any disciplinary action against the witness.

**6 (c) Appeal:**

- i. Within two working days from receipt of the prima facie finding or the charges, if the complainant or the accused is dissatisfied with the decision of the Scrutiny Committee, she or he may appeal specifying the reasons in writing to the Board of Directors of the Company within five working days from its receipt. The appeal shall be finally disposed off by written communication to the said party. The decision of the Board of Directors of the Company shall be final.
- ii. The Board of Director's decision of the disciplinary action shall be final and cannot be appealed further.

Person aggrieved from recommendations of committee or non- implementations of its recommendations may prefer the appeal to the appropriate legal authority.

**6(d) Facilities:**

Facility for medical, legal, counseling or any other support service regarding Sexual Harassment may be made available or to make arrangement to avail such supports from the Company to all its employees. Employee seeking such a facility shall approach the designated counselor.

**7. Term of Office:**

Every member nominated and appointed shall hold office till three years under Sexual Harassment

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Act, 2013 from the date of appointment. If the member does not attend three consecutive meetings of the committee, he/she shall cease to be such member and the decision of the Committee, on question whether he/she has ceased to be such member or not, shall be final.

Any vacancy arising thereof shall be filled as early as possible by the Company and the person so nominated shall continue to be a member for the duration of term of office as that of the member in whose place he/she is nominated.

The existing members will be eligible to be nominated again for the next term.

**8. Report:**

Annual report summarizing complaints and redressal of Sexual Harassment shall be prepared by the Company. The said report as well as all documents in the custody of the Company regarding Sexual Harassment complaints shall be designated 'Confidential'.

The policy against Sexual Harassment shall be updated from time to time and made accessible to all the employees.


9. In the event there is any conflict between the policy and the legal enactment, then the legal enactment shall prevail.

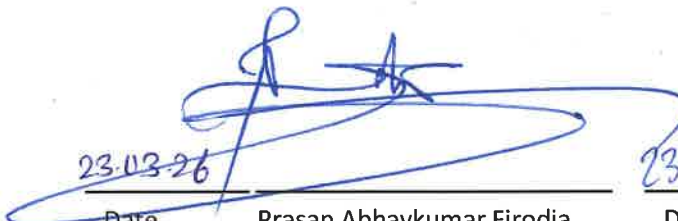
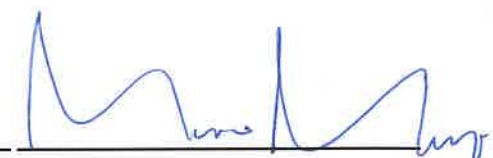
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<b>STATUS</b>	POSH Final
<b>VERSION NUMBER/FINAL</b>	Version 4
<b>EFFECTIVE DATE</b>	1 January 2026
<b>NEXT SCHEDULED REVIEW DATE</b>	1 January 2027
<b>OWNER</b>	CEO
<b>SUPERSEDES</b> <b>VERSION</b>	Version 3
<b>SCOPE</b>	Directors and employees (including secondees)

<p>_____</p> <p>Date      Abhaykumar Navalmal Firodia</p> <p style="text-align: center;">DIN: 00025179</p>	<p style="text-align: right;">23.03.26 </p> <p>_____</p> <p>Date      Tobias Ostermaier</p> <p style="text-align: center;">DIN: 09214149</p>
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<p style="text-align: right;">23.03.26 </p> <p>_____</p> <p>Date      Prasan Abhaykumar Firodia</p> <p style="text-align: center;">DIN: 00029664</p>	<p style="text-align: right;">23.03.26 </p> <p>_____</p> <p>Date      Marco Mayer</p> <p style="text-align: center;">DIN: 11001800</p>
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<p style="text-align: right;">23.03.26 </p> <p>_____</p> <p>Date      Prashant Vijay Inamdar</p> <p style="text-align: center;">DIN: 07071502</p>	<p style="text-align: right;">23.03.2026 </p> <p>_____</p> <p>Date      Nicholas Georg Templin</p> <p style="text-align: center;">DIN: 11342689</p>
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