



**Policy on Prevention of Sexual Harassment & Gender-Neutral Workplace Harassment (POSH)
(Effective from May 25, 2026)**

Amara Raja Energy & Mobility Limited

CIN: L31402AP1985PLC005305

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POLICY ON PREVENTION OF SEXUAL HARASSMENT & GENDER-NEUTRAL WORKPLACE HARASSMENT (POSH)

1. SPIRIT AND OBJECTIVE OF THE POLICY

- 1.1 Amara Raja Energy & Mobility Limited (ARE&M/Company/Employer) is committed to create a safe, healthy, respectful, and inclusive working environment for all individuals. The Company believes that every person has the right to work with dignity, free from harassment, discrimination, or intimidation.
- 1.2 This Policy aims to:
 - Protect against sexual harassment of women at the workplace in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition And Redressal) Act, 2013 (POSH Act, 2013 or Act).
 - Extend protection against harassment (including sexual harassment and other inappropriate conduct) to all individuals irrespective of gender, including men, transgender persons, employees, trainees, consultants, contract workers, and visitors.
 - Ensure prevention and prohibition of harassment, redressal of complaints and promote a culture of mutual respect and zero tolerance towards harassment.
- 1.3 While complaints of sexual harassment by women shall be addressed through the Internal Committee (IC) as per statutory requirements, the Company shall also provide an internal grievance redressal mechanism for complaints raised by individuals of any gender.

2. EFFECTIVE DATE AND SCOPE

- 2.1 The policy comes into force with immediate effect and shall be reviewed as and when required.
- 2.2 This Policy applies to all employees, individuals, and persons associated with or engaged by Amara Raja Energy & Mobility Limited, whether employed directly or indirectly, including permanent/temporary employees, trainees, interns, consultants, contract workers (ad hoc or daily wage basis), agency personnel, visitors, vendors, and any person providing services to or visiting any workplace, office, unit, establishment, or premises of the Company whether for remuneration or not or working on a voluntary basis or otherwise.

3. DEFINITIONS & MEANINGS

- 3.1 Sexual Harassment: includes any one or more of the following unwelcome acts or behavior (whether directly or indirectly) namely: -
 - a) physical contact and advances; or
 - b) a demand or request for sexual favours; or
 - c) making sexually colored remarks; or
 - d) showing pornography; or
 - e) any other unwelcome physical, verbal, non-verbal conduct of sexual nature.

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

- f) implied or explicit promise of preferential treatment in the employment; or
- g) implied or explicit threat of detrimental treatment in the employment; or
- h) implied or explicit threat about the present or future employment status of any person; or
- i) interferes with the work or creating an intimidating or offensive or hostile work environment for such person; or
- j) humiliating treatment is likely to affect health or safety.

3.2 Workplace Harassment (Gender-Neutral)

Includes any unwelcome conduct (physical, verbal, non-verbal, written, digital or sexual) that:

- Creates an intimidating, hostile, or offensive work environment
- Causes emotional distress, humiliation, or harm

Includes bullying, intimidation, discrimination, abuse of authority, or inappropriate conduct irrespective of gender.

3.3 Aggrieved woman: “Aggrieved woman” means in relation to a 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.

3.4 Aggrieved Person: in relation to a workplace, means a person, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment, by the Respondent.

3.5 Respondent: means an employee/person against whom a complaint of sexual harassment at the workplace has been filed and/or an allegation of sexual harassment at the workplace has been made by a complainant.

3.6 Workplace: It includes the following

- Work-from-home situations,
- Employer-provided transport,
- Client locations,
- Company events,
- Official trips,
- Virtual/online work environments connected to employment.

3.7 Presiding Officer: “Presiding Officer” means who is heading the Internal Committee.

3.8 Complaint: “Complaint” means a written statement disclosing identity of Complainant and details of respondent with narration of the incident on sexual harassment duly signed by the Complainant.

3.9 Location Support Representative (LSR): A representative from each location who will help in the smooth execution of POSH process, extend necessary support to female aggrieved employees.

The words and expressions used and not defined in this policy but defined in the POSH Act, Companies Act, 2013 or SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall have the meanings respectively assigned to them in the Act/Rules and Regulations.

4. CONSTITUTION OF INTERNAL COMMITTEE (IC)

4.1 **An Internal Committee** has been constituted by the Company in writing to consider and redress complaints of Sexual Harassment. The details of the Internal Committee are given in Annexure -I.

4.2 **A Location Support Representative (LSR)** is available at each location, and the details of the LSRs are given in Annexure-II. This information is also available with the respective Business HR team, Shared Services, and in “AR Engage”, Company’s intranet portal.

5. PROCESS OF COMPLAINT HANDLING:

5.1 Any aggrieved Women directly or indirectly may send a complaint as per Annexure – III in a sealed cover narrating the alleged incident in writing with her signature within 3 months of occurrence of incident to the Presiding Officer / any member of the IC as prescribed in Annexure-I. Any complaints received beyond said time may be taken on record at the discretion of the Committee.

- 5.2 Within 15 days, the Committee members shall hold a meeting with the Complainant and shall hear the Complainant and record her allegations. The Complainant can also submit any corroborative material with documentary proof, oral or written material, etc., to substantiate her complaint.
- 5.3 Thereafter, within 10 days of discussion with the complainant, the Committee shall hold a dialogue with the respondent for further clarification on the complaint.
- 5.4 Conciliation proceedings may be initiated only upon a written request made by the aggrieved woman.
- 5.5 In the case of disagreement in the Conciliation process, an "Enquiry" shall be conducted and concluded by the Committee in the process as may be prescribed.
- 5.6 It is left to the discretion of the IC to cross-examine the Complainant and the Respondent.
- 5.7 If the Complainant or the person, against whom complaint is made, desires any witnesses to be called, they shall communicate in writing to the Committee the names of witness/es whom they propose to call.
- 5.8 The Committee shall call upon all witnesses mentioned by both parties.
- 5.9 The Committee shall provide every reasonable opportunity to the Complainant and Respondent, for putting forward and defending their respective cases.
- 5.10 The IC shall hold discussions with concerned parties and share their findings and recommendations to the Chief People Officer within 40 days from the closing of discussion with the alleged. (Within 75 days from the date of receipt of the complaint).
- 5.11 The recommendations of the Committee based on enquiry report shall be treated as final, the erring employee will be awarded an appropriate punishment within 90 days from the date of receipt of Complaint and in line with Certified/Model Standing Orders / Service Rules of the Company.
- 5.12 The probable punishment will be Censure, Warning, Fine, Suspension, Dismissal or any other punishment proposed based on the severity of the incident.
- 5.13 Interim Relief During Pendency of Inquiry
During the pendency of an inquiry, upon a written request made by the aggrieved woman, the Internal Committee may recommend to the employer interim relief measures including:
 - transfer of the aggrieved woman or the respondent to another workplace;
 - grant of leave to the aggrieved woman up to the period prescribed under law; or
 - any other appropriate relief measure.

6. Duties of Employer

Every employer shall—

- (a) provide a safe working environment at the workplace which shall include safety at the workplace;
- (b) display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the constitution of the Internal Committee under Clause 4(1) of this Policy;
- (c) organise workshops and awareness programmes at regular intervals for sensitizing the employees with the provisions of the Act and with this policy. Orientation programmes for the members of the Internal Committee may be organized in the manner as may be prescribed;
- (d) provide necessary facilities to the Internal Committee or the Local Complaints Committee, as the case may be, for dealing with the complaint and conducting an inquiry;
- (e) assist in securing the attendance of respondent and witnesses before the Internal Committee or the Local Complaints Committee, as the case may be;
- (f) make available such information to the Internal Committee or Local Complaints Committee, as it may require having regard to the complaint made under Clause 9(1) of this Policy;
- (g) provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force;
- (h) cause to initiate action, under the Indian Penal Code (45 of 1860) 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;
- (i) treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct;
- (j) monitor the timely submission of reports by the Internal Committee.

7. Complaints under Gender-Neutral Workplace Harassment

Any individual (irrespective of gender) may raise a complaint with:

- HR / Business HR
- Gender-Neutral Workplace Harassment Committee (as may be constituted by Chief People Officer)

The complaint shall be:

- Acknowledged promptly
- Investigated in a fair, confidential, and unbiased manner

The process will include:

- Fact-finding
- Opportunity for both parties to be heard
- Witness examination (if applicable)
- Recommendation to Chief People Officer
- As guiding principle, the process will be completed **within 90 days** from the date of complaint/initiation, with interim actions and responses addressed within **7 to 10 working days** at each stage.

8. Representation & Escalation Mechanism

- 8.1 Any aggrieved party (Complainant or Respondent), who is not satisfied with the findings, recommendations, or action taken based on the decision of the Internal Committee (IC) / Gender-Neutral Workplace Harassment Committee, may submit a representation to the Chief People Officer within 15 days from the date of communication of the decision, clearly stating the grounds for dissatisfaction along with supporting documents, if any.
- 8.2 The Chief People Officer shall review the representation along with the case records and the recommendations of the Committee and may:
- a) Uphold the decision of the Committee; or
 - b) Seek additional clarification from the Committee; or
 - c) Recommend re-evaluation of the case, if deemed necessary.
- 8.3 In case the aggrieved party is not satisfied with the decision of the Chief People Officer, the matter may be escalated within 15 days to Management.
- 8.4 In case the aggrieved party is not satisfied with decision of the management, the matter may be appealed under Section 18 of the Act.
- 8.5 The decision of the Management shall be final and binding within the organization.

9. Common Principles (Applicable to All Cases)

9.1 Confidentiality:

- All information relating to complaints, including the identity of the aggrieved woman/person, respondent, witnesses, contents of the complaint, inquiry proceedings, recommendations of the Internal Committee/Gender-neutral workplace harassment Committee, and actions taken by the employer, shall be kept strictly confidential.
- Any person found to be in breach of confidentiality obligations shall be liable for disciplinary Action.

9.2 No retaliation against complainant or witnesses

9.3 Natural justice principles shall be followed

9.4 Both parties will be given fair opportunities.

10. Outcome & Disciplinary Action

Based on findings, actions may include:

- Warning / Censure
- Apology / Counseling
- Withholding of benefits
- Suspension
- Termination
- Any other action as per certified model standing orders/service rules of the Company

11. GENERAL CONDITIONS

- 11.1 This Policy applies to all individuals associated with the Company.
- 11.2 If a complaint does not fall under sexual harassment, it may be addressed under workplace harassment provisions.
- 11.3 False or malicious complaints/ witnesses may invite disciplinary action (after due examination).
- 11.4 Proper documentation shall be maintained with confidentiality.
- 11.5 Determination of the compensation as per the Act.

12. EXPECTED BEHAVIOURS AND CULTURAL IMPACT

- 12.1 Promote a respectful, inclusive, and safe workplace.
- 12.2 Encourage reporting without fear.
- 12.3 Ensure awareness through training and communication.

13. GENERAL INFORMATION

- 13.1 Interpretation lies with Chief People Officer
- 13.2 Management reserves right to amend policy

Internal Committee Members and their Addresses

- 1. Mrs. Sujatha. M - Presiding Officer**
Manager - B&C Materials Planning
Amara Raja Energy & Mobility Limited
Karakambadi, Tirupati, Chittoor, A.P – 517520
Ph: 0877 – 2265000 Extn:7890
Email : msj@amararaja.com
- 2. Mrs. Madhavi.A - IC Member**
Asst. Manager - Finance & Accounts
Amara Raja Energy & Mobility Limited
1-18/1/AMR/NR, Nanakramguda
Gachibowli, Hyderabad, Telanagana – 500032
Ph: 40 -23139000 Extn: 9309
- 3. Vanitha. A - IC Member**
Deputy Manager - Commercial Billing
Amara Raja Energy & Mobility Limited
Nunegundlapalli, Chittoor, AP – 517124
Ph: 08572 280100 Extn:8901
- 4. Mrs. Vimala Chowdary K - IC Member**
Asst. Manager - CI&Lean
Amara Raja Energy & Mobility Limited
Nunegundlapalli, Chittoor District, AP – 517124
Mobile Number : 6305585416
- 5. Padmaja. P - IC Member**
Asst. Manager - Employee Relations
Amara Raja Energy & Mobility Limited
Karakambadi, Tirupati, Chittoor, A.P – 517520
Ph: 0877 – 2265000 Extn: 8717
- 6. Suneetha. G - IC Member**
Manager - IMD-QA
Amara Raja Energy & Mobility Limited
Karakambadi, Tirupati, Chittoor, A.P – 517520
Ph: 0877 – 2265000 Extn: 7707
- 7. Mr. Nalini Kumar. K - IC Member**
Head - Shared Services HR
Amara Raja Energy & Mobility Limited
Karakambadi, Tirupati, Chittoor, A.P – 517520
Ph: 0877 – 2265000 Extn: 8717
- 8. Ms. S.B. Keerthana - IC Member (External)**
Lakshmanan Street,
Chennai, Tamilnadu 600 017
Mobile Number : 9087467470

ANNEXURE – II
(As per policy clause 4.2)

Location Support Representatives				
Sl. No	Name	Location	Mobile No	Email Id
1	Kavitha. W	Nunegundlapalli	8897567886	kvw@amararaja.com
2	Remya. P	Bangalore	9148358555	rp1@amararaja.com
3	Jeyakumari. T	Chennai	9445334016	jt1@amararaja.com
4	Sheeba	Coimbatore	9843507936	coiacc@amararaja.com
5	Sangeeta Hazarika	Hyderabad	9666042814	sngh@amararaja.com
6	Usha.P .O	Mumbai	9967622188	usha@amararaja.com
7	Diksha Singh	New Delhi	9818525581	dks@amararaja.com
8	Malathi. P	Head Office	9573750581	pmt@amararaja.com

ANNEXURE – III
(As per policy clause 5.1)

COMPLAINT LETTER

Date of Incident: _____ Date of Complaint: _____

Details of the aggrieved woman:

Name and current mailing address	
Permanent address	
Email id:	
Mobile number	
Department/Function	
Company& Location	

Details of Alleged:

Employee Code	
Employee Name	
Department/Function	
Company& Location	

Narration of the Incident:

Signature of the Aggrieved woman