



## **Allcargo Global Limited**

### **Policy on Prevention of Sexual Harassment at Workplace**

## **A. Introduction:**

Allcargo Group is an equal opportunity employer, and its policy ensures – no discrimination or harassment on the basis of race, colour, religion, age, gender identity, national origin, citizenship, disability, marital status or any other characteristic protected by law.

Consistent with our business principles, the organisation is committed to a work environment where all individuals are treated with respect and dignity. Each individual should have the ability to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices and harassment. Towards this, it is essential that each employee deals with their colleagues and third parties with full fairness and respect and realizes that his/her behaviour will be attributed to the Company and can affect its inward and outward reputation. Harassment of any kind including sexual harassment is forbidden. Every employee has the right to be protected against harassment, regardless of whether the accused considers his or her own behaviour to be normal or acceptable and of whether the harassed person has/had the opportunity to avoid the harassment. Discrimination and sexual harassment are against organisation's policy and illegal under applicable laws.

This Policy on Prevention of Sexual Harassment (POSH) ["Policy"] is framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ["Act"] and the Rules framed thereunder which is aimed at providing every person at the workplace a safe, secure and dignified work environment.

## **B. Objective :**

The Company believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or at the *extended* work place is a grave offence. The Company is committed to undertake complete investigation of the complaint/ incident reported to the Internal Committee and provide support to victim of such sexual harassment and undertake disciplinary action against delinquent to the full satisfaction of the complainant while preventing deterrent for its recurrence

## **C. Applicability :**

This policy applies to the following categories:

- a. All employees, regardless of seniority or contractual status, that is permanent, short or long - term contract, and temporary /casual employees, probationer, trainee, apprentice, on deputation, working as consultant, or applicants for employment whether for remuneration or not, or working on a voluntary basis or otherwise;
- b. All Board members, Executive and non-executive Directors, owners and stakeholders; and
- c. All persons dealing with the Company, clients, customers, suppliers, contractors /sub contractor and with whom employees interact personally or by telephone, or by electronic communication, including written communication, web-sites and emails.

## **D. What constitute sexual Harassment? :**

Sexual Harassment as defined under the Act, means any unwelcome acts or behaviour (whether directly or by implication) namely:-

- a. Physical contact and advances;
- b. A demand or request for sexual favours;
- c. Making sexually coloured remarks;
- d. Showing pornography; or
- e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

Sexual Harassment takes place if a person:

1. Subjects another person to an unwelcome act of physical intimacy, like grabbing, brushing, touching, pinching etc. or remark of connotation, cracking loud jokes related thereto or conduct of a sexual nature, which could be verbal, or even non-verbal.
2. Makes an unwelcome demand or request (whether directly or by implication) for sexual favours from another person, and further makes it a condition for employment / payment of wages /increment / promotion etc.
3. Shows a person any sexually explicit visual material, in the form of pictures/cartoons/pin-ups/calendars/screen savers on computers/any offensive written material/pornographic e-mails, etc.
4. It is sexual harassment if a supervisor / boss requests sexual favours from a junior in return for promotion or other benefits or threatens to sack for non-cooperation. It is also sexual harassment for a boss to make intrusive inquiries into the private lives of employees, or persistently ask them out.

#### **E. Adoption of Sexual Harassment Policy within frame work of Code of Conduct**

Sexual harassment at the workplace is unfair discrimination and is unacceptable behavior pertaining to sexual orientation. Any other form of harassment shall be governed by the Code of Conduct of the Company. All policies shall be aligned in such a way that due coverage takes place including terms of employment.

The Company is committed to the implementation of the following procedures, impart the training to all employees in what constitutes sexual harassment, how complaints may be lodged, and how the complaints should be dealt with.

#### **F. Communication of Policy and Guidelines to Employees**

Employees who have experienced such conduct or any conduct falling under the provision of these guidelines are encouraged to report it without fear. Early reporting may prove to be a highly effective method of resolving actual or perceived incidents of harassment or discrimination. Therefore, while no fixed reporting period has been established, the organisation strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken when appropriate.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to harassing conduct may promptly advise the offender that his or her behaviour is unwelcome and requesting that it be discontinued.

#### **G. Complaint Channel**

- a. The receiver of the behaviour should indicate both verbally and non-verbally that the behaviour is considered offensive and is unwelcome, and specifically request the person responsible to stop the behaviour.

- b. Where the receiver feels that they cannot do this, or they have done this, but the behaviour continues, the receiver may either ask for the behaviour to be dealt with informally or use the formal Complaint Procedure.
- c. Formal Complaint may be lodged, as per Policy guidelines provided hereinbelow.

## **H. Confidentiality, Record-Keeping and Media Statements:**

In accordance with the Act, the Company has constituted Internal Committees [“ICs”] to prevent instances of Sexual Harassment and to effectively deal with complaints involving Sexual Harassment.

ICs are responsible for:

- a. Investigating every formal written complaint of sexual harassment
- b. Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- c. Discouraging and preventing employment-related sexual harassment.

ICs could try to resolve the complaint informally first before the complaint goes to the formal channels of complaints. **This conciliation process shall be opted as first measure for quick resolution.**

The group has implicit responsibility and legal obligation to address the issue in utmost confidential, precise and professional way and to ensure that company’s image is protected in a manner that justice is seen to be done and received in most appropriate way while maintaining confidentiality for good of aggrieved employee. It is necessary that we follow each stage judiciously

- a. At all stages of the procedures, informal and formal, and from the first discussions when the potential allegations of sexual harassment are discussed, all parties to the discussion are required to be aware of the sensitivity of the matters under discussions, the potential impact on individual lives and careers. It is important to exercise extreme caution in the disclosure of the information, and where possible to maintain the confidentiality of the receiver and complainant and the person responsible for the behaviour.
- b. Once the procedures are concluded, the documents should be filed in sealed envelopes marked confidential, and lodged with the person responsible for the retention of personnel records
- c. Any requests for information from Media sources if any should be referred to the person within the company responsible for Media briefings.
- d. Notwithstanding anything contained in the Right to Information Act, 2005, the content of the Complaint, the identity and addresses of the aggrieved persons, respondent and witness, any information relating to conciliation and inquiry proceedings, recommendations of the Internal Committee and the action taken by the employer shall not be published, communicated or made known to the public, press and media in any manner.

## **I. Dealing with Complaint**

It is the obligation of all employees to report sexual harassment experienced by them personally not later than 3 month’s to the Chairman / Presiding Officer of respective IC of any instance or behaviour of sexual harassment by a co- employee towards another employee. Provided that where such complaint cannot be made in writing, the Presiding Officer or any member of the Complaint Committee, as the case maybe, shall render all reasonable assistance to the aggrieved for making the complaint in writing.

Employee also has the option of reporting the complaint using the Grievance Redressal Tab available on Darwinbox which can also be accessed on one's smart phone.

Where the aggrieved is unable to make a complaint on account of physical or mental incapacity or death or otherwise, legal heir or such other person may be prescribed may make a complaint.

Once the complaint is received, it will be kept strictly confidential. The person accused will be informed that a complaint has been filed against him/her and no unfair acts of retaliation or unethical action will be tolerated. The IC shall ensure that a fair and just investigation is undertaken immediately.

Where a settlement has been arrived through conciliation, the settlement so arrived shall be recorded and forwarded to the Management to take action as specified in recommendation. Where a settlement is arrived; no further inquiry shall be conducted. Provided that where the aggrieved person informs that any term or condition of settlement arrived has not been complied with by the respondent, the Internal Committee shall proceed to make an inquiry into the complaint.

The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 90 days of the receipt of the complaint. If the investigation reveals that the complainant has been sexually harassed as claimed, the accused will be disciplined accordingly.

The victim of sexual harassment has the option to seek transfer of the accused or his/her own transfer.

#### **J. Disciplinary Action**

Post the enquiry IC has to prepare a report stating the findings of their enquiry and recommend appropriate disciplinary action against the accused. Disciplinary action may include transfer, withholding of promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant or as per provision of law as applicable.

However, the IC must bear it in mind that disciplinary should not be disproportionate to type / gravity of act committed and be based purely on merit.

#### **K. Awareness Training**

- a. All Senior Management Team Personnel and Supervisors are required to attend executive briefings on their legal duties and responsibilities in the handling of sexual harassment allegations including procedure to handle allegations of sexual harassment cases.
- b. All new employees shall be informed about this policy / guideline through intranet. In case any employee wish to seek clarification, he / she may approach the location head.
- c. Skills training is also required for those who may receive the complaints, not only on how to deal with the complaints, but also mediation and conflict resolution skills, and delegates to these training workshops. HR shall identify such personnel and organize such programs.
- d. Display of Penal consequences and IC constitution details at a conspicuous place within the workplace.

#### **L. Review of Policy**

The Nomination & Remuneration Committee and management reserve the right to review the policy from time to time. All such modifications will be communicated to the employees, directors and published on website and intranet.

<b>Version</b>	1.0
<b>Issuing Authority</b>	Board of Directors on the recommendation of Nomination & Remuneration Committee
<b>Owner of the document</b>	Group Chief Human Resources Officer
<b>Effective Date</b>	May 25, 2026
<b>Date of last review/Amendment</b>	May 25, 2026
<b>Version History</b>	Version 1.0: Adopted on May 25, 2026