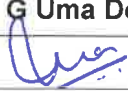
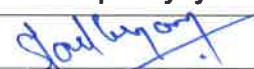

 JODAS EXPOIM PVT. LTD.	<b>Title</b>	<b>Prevention Of Sexual Harassment at Work Place - POSH Policy</b>	
<b>Department</b>	<b>HUMAN RESOURCES</b>	<b>Effective Date</b>	<b>05/02/2023</b>
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2. Applicability
3. Internal Complaints Committee
4. Grievance Handling Procedure
  - 4.1. Redressel Procedure
  - 4.2. Enquiry Process
  - 4.3. Interim Measures
  - 4.4. Other points for consideration / Support from Management and Human Resource
  - 4.5. Confidentiality
  - 4.6. Malicious or false complaint
  - 4.7. Disciplinary Action
  - 4.8. Criminal Proceedings

**1.0 Objective:**

- 1.1 Jodas Expoim is committed to a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional environment, free of violence, harassment, exploitation, and intimidation. This includes all forms of gender violence, sexual harassment, and discrimination on the basis of gender.
- 1.2 Every Associate should be aware that while Jodas is committed to the right to freedom of expression and association, it strongly supports gender equality and opposes any form of gender discrimination and violence. Therefore, Jodas expects that all relationships among persons in the workplace be business-like and free of bias, prejudice and harassment.
- 1.3 As required by applicable law in India, including without limitation The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act"), the Company has framed this Policy on the Prevention of Sexual Harassment at Workplace ("Policy").

	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
<b>Name</b>	G Uma Devi	Vinod Upadhyay	Satyendra Kumar Singh
<b>Signature</b>			
<b>Date &amp; Time</b>	20/01/2023	01/02/2023	03/02/2023


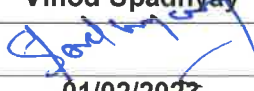

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## 2.0 Applicability:

- 2.1 The Management of Jodas Expoim together with the Group companies together mentioned as 'Jodas' hereunder, is committed to provide non-discriminatory and safe working atmosphere with an emphasis on safety of employees from sexual harassment.
- 2.2 This Policy is applicable to **all employees** of Jodas, including persons employed on **regular, temporary, adhoc or daily wage basis, either directly or through an agent, including a contractor**, with or without the knowledge of the Company, 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, consultants, a contract worker, probationer, trainees, apprentices or any employee called by any other such name at any level in organisational hierarchy in India (collectively referred to herein as "Associate(s)"). **This policy also covers all contract workers, visitors & vendors.**
- 2.3 Sexual harassment is a form of misconduct that undermines the employment relationship. No associate should be subjected verbally or physically to unsolicited and unwelcome sexual overtures or conduct, either directly or indirectly. Sexual harassment refers to behaviour that is not welcome, that is personally offensive, that debilitates morale and, therefore, interferes with work effectiveness.
- 2.4 Accordingly, this policy is to prohibit harassment of an associate by another associate on the basis of gender. The purpose of this policy is not to regulate our employees' personal morality. It is to ensure that, in the workplace, no associate harasses another associate on the basis of gender
- 2.5 While it is not easy to define precisely what sexual harassment is, it certainly includes the following behaviours, but this not the exhaustive list.

### Non-Verbal

- Making derogatory gestures / giving sexually suggestive looks
- Staring / leering
- Invading personal space
- Pin-ups
- Offensive publications or personal comments on social media, inappropriate messages etc
- Sending suggestive letters, memos, notes, e-mails, sms, whats app msgs, etc
- Unsolicited and unwanted gifts
- Displaying electronic content of sexual nature - images or videos, pornography, with co-workers

	Prepared By	Reviewed By	Approved By
Name	G Uma Devi	Vinod Upadhyay	Satyendra Kumar Singh
Signature			
Date & Time	20/01/2023	01/02/2023	03/02/2023

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### Verbal

- Language of a suggestive or explicit nature
- Unwanted propositions
- Jokes of a sexual or explicit nature
- Questions or comments of a personal nature
- Making sexual comments about appearance, clothing, or body parts
- Making derogatory / sex-based / gender-based comments
- Persistently asking someone for dates
- Addressing someone as sexy, dear, sweetheart, bebe, honey etc.
- Making sexual innuendoes or stories
- Requesting or demanding sexual favours from someone
- Inappropriate conduct on videocalls, such as asking for full physical view on video conferencing calls


### Physical


- Deliberate body contact
- Indecent exposure
- Groping / fondling / kissing
- Coerced sexual contact
- Blocking someone's path to make a sexual advance
- Stalking someone

Or any other gesture, act, etc that amounts to sexual harassment, beyond the above listings

2.6 Jodas will take all necessary and reasonable steps to prevent and ensure that no associate is subject to sexual harassment by any third party, during the course of employment. Where any such Sexual Harassment occurs, the employer shall take all necessary steps to assist the aggrieved to redress the act of Sexual harassment. No associate of Jodas shall sexually harass an outsider who visits the offices of Jodas.

### 3.0 Internal Complaints Committee (ICC)


	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
<b>Name</b>	G Uma Devi	Vinod Upadhyay	Satyendra Kumar Singh
<b>Signature</b>			
<b>Date &amp; Time</b>	20/01/2023	01/02/2023	03/02/2023

 JODAS EXPOIM PVT. LTD.	<b>Title</b>	<b>Prevention Of Sexual Harassment at Work Place - POSH Policy</b>	
<b>Department</b>	<b>HUMAN RESOURCES</b>	<b>Effective Date</b>	<b>05/02/2023</b>
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- 3.1 The Management has constituted an Internal Complaints committee as required by applicable law, which would deal with all formal Complaints and allegations of Sexual Harassment.
- 3.2 The IC will consist of Seven (7) members, with at least one member nominated from an NGO or person familiar with issues of Sexual Harassment.
- 3.3 In addition to the above, an advisor from NGO or a legal advisor will be consulted, if required.
- 3.4 The details of IC Committee will be displayed, from time to time, on the notice boards(s) at each of the Company's offices/premises, and/or its internal website. The Company will also regularly and promptly notify (in the aforesaid manner) any changes in the constitution of the Committee, or to the contact details of the members of the Committee.
- 3.3 Disqualification, resignation or termination of membership — An ICC member (including the Presiding Officer) shall be removed from the Committee / disqualified by the Company, if she/he:
- Contravenes Section 16 of the POSH Act.
  - Has been convicted for an offence or if an inquiry into an offence under any extant law is pending against her/him.
  - Is found guilty in any disciplinary proceedings or if a disciplinary proceedings is pending against her/him.
  - Has so abused her/his position as a member of the Committee as to render her/his continuance in office prejudicial to public interest.
  - Ceases to be an employee of Jodas.
- 3.4 Term - An ICC member shall not hold office for more than 3 years. However, the Company may temporarily extend the term of any member of the Committee in order to dispose of any pending Complaint.
- 3.5 A quorum of 3 members is required to be present for an inquiry to take place. The quorum shall include the Presiding Officer and at least two members, with at least one person being women. In case of four members at least half should be women. The decisions of the Committee shall be decided by the majority vote and in cases of division of votes equally, the Presiding Officer shall have a casting vote.

#### 4.0 Grievance Handling Procedure

	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
<b>Name</b>	<b>G Uma Devi</b>	<b>Vinod Upadhyay</b>	<b>Satyendra Kumar Singh</b>
<b>Signature</b>			
<b>Date &amp; Time</b>	<b>20/01/2023</b>	<b>01/02/2023</b>	<b>03/02/2023</b>

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#### 4.1 Redressel Procedure

4.1.1 Any associate who has experienced or is subjected to any act of Sexual harassment may share complaint at the earliest point of time and in any case within three months of occurrence of the alleged incident in writing, with supporting evidence and witness details of the alleged incident

4.1.2 The complainant shall address the complaint to the Head of the Organization or Chairperson of IC or HR & handover the same in person or send an email or furnish the same in a sealed cover.

4.1.3 Where an aggrieved associate is unable to make a complaint on account of their physical or mental incapacity or any other reason, a complaint may be filed by:

1. relative or friend; or
2. co-worker; or
3. Any person who has knowledge of the incident, with the written consent of the aggrieved associate.

4.1.4 Where the aggrieved associate is dead, a complaint may be filed by any person who has knowledge of the incident with the written consent of the legal heir of the aggrieved associate.

4.1.5 ICC may, for the reasons to be recorded in writing, extend the time limit not exceeding 90 days, if it is satisfied that the circumstances were such which prevented the aggrieved associate from filing a complaint in 90 days.



4.1.6 The complaint may be oral or in writing. If the complaint is oral, the ICC member shall record the same in writing, in detail, and have the contents confirmed by the complainant.


4.1.7 The complainant is ordinarily required to submit 6 copies of the complaint along with supporting documents and the names and addresses of the witnesses to ICC.

4.1.8 ICC will maintain a register to record the complaint received and keep the contents confidential, if it is so desired, except to use the same for discrete investigation.

4.1.9 On the request of the aggrieved associate ICC can enable conciliation with the accused.

4.1.10 If the aggrieved associate does not want conciliation, ICC shall begin the enquiry.

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4.1.11 ICC will hold a meeting within five working days from receipt of the complaint but no later than a week in any case.

4.1.12 At the first meeting the ICC members shall hear the Complaint and record the allegations.

4.1.13 If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady ICC member shall meet and record the statement.

4.1.14 Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to give an explanation, where after, an "Enquiry" shall be conducted and concluded.

4.1.15 Notwithstanding anything contained in any other law for the time being in force, the onus of proving the innocence shall be on the accused and the victim shall have the right to lead evidence in rebuttal.

4.1.16 In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof under intimation to the complainant.

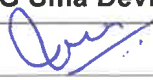


4.1.17 In case the complaint is found to be false, The ICC may recommend to the Management of Jodas, strict disciplinary action against the complainant.


## 4.2 Enquiry Process

The ICC shall immediately i.e. within a week proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.

4.2.1 The ICC shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give an opportunity to submit a written explanation if within 7 days of receipt of the same.

4.2.2 The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.

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<b>Signature</b>			
<b>Date &amp; Time</b>	<b>20/01/2023</b>	<b>01/02/2023</b>	<b>03/02/2023</b>


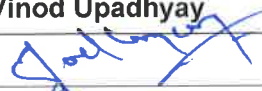

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- 4.2.3 If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the ICC the names of witness/es whom they propose to call.
- 4.2.4 If the Complainant desires to tender any documents by way of evidence before the ICC, they shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee they shall supply original copies of such documents. Both shall affix their signature on the respective documents to certify these to be original copies.
- 4.2.5 The ICC shall call upon all witnesses mentioned by both the parties.
- 4.2.6 The ICC shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- 4.2.7 The ICC shall complete the “Enquiry” within a period of one month but not beyond three months after receiving the complaint and communicate its findings and its recommendations for action to the Head – HR/Management team.
- 4.2.8 The report of the ICC shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- 4.2.9 The Head - HR will direct appropriate action in accordance with the recommendation proposed by the ICC within a months time.
- 4.2.10 The ICC shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.

#### 4.3 Interim Measures

4.3.1 During the pendency of the enquiry, on a written request made by the aggrieved associate, ICC shall be empowered to recommend to the Company and the Company shall implement, any of the following:

- 1) The transfer of aggrieved associate or the alleged accused to any other workplace;

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- 2) The grant of leave to the aggrieved associate up to a period of three months;
- 3) Restrain the alleged accused from reporting on the work performance of the aggrieved associate or writing the confidential report of the aggrieved associate and assign the same to another officer of the Company;
- 4) The grant of any such other relief to the aggrieved associate; as may be prescribed or permitted.

4.3.2 Any such leave granted to the aggrieved associate shall be in addition to the leave they would be otherwise entitled to under applicable law.

4.3.3 The Company reserves the right to require the alleged accused to take indefinite administrative leave (with payment of applicable salary) immediately from the time of receipt of a formal complaint of sexual harassment until the ICC has concluded its investigation. This is to ensure that there is no retaliation against the alleged accused by other employees and/or retaliation by the alleged accused against the complainant/other employees. Any such decision will be communicated in writing to the alleged accused by the ICC or its designee in writing. The Company reserves the right to require the alleged accused to work from an alternate company location during the enquiry.

#### 4.4 Other points for consideration / Support from Management and Human Resource

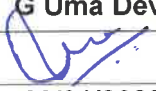


4.4.1 The Committee may recommend to the Head - HR, action which may include transfer, or any of the other appropriate disciplinary action.

4.4.2 The Management shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this policy.


4.4.3 Where sexual harassment occurs as a result of an act or omission by any third party or outsider, Jodas shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

4.4.4 In case an incident happens at another location/organization where the complainant had visited for official work. Complainant can choose to file complaint at Jodas or the location of the incidence. Jodas ICC with help the complainant in either situation to file her complaint and take action under this policy.

4.4.5 It is also expressly prohibited for any person to retaliate against a person who brings sexual harassment charges or assists in investigating charges. Retaliation is a violation

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of this policy and may result in initiating disciplinary action. No person will be discriminated against, or discharged, because of bringing or assisting in the investigation of a complaint of sexual harassment.

#### 4.5 Confidentiality

4.5.1 All information received shall be kept confidential. Any person (including witnesses) who breaches confidentiality shall be subject to disciplinary action.

4.5.2 All enquiries and/or complaints will be investigated as quickly as possible. Any investigation will be conducted in a confidential manner as is compatible with a thorough investigation of the complaint.

4.5.3 Given the sensitive nature of cases of sexual harassment and their impact on the victim as well as the person against whom such allegations are levelled, Jodas is committed to maintain confidentiality in relation to such complaints and the resultant enquiry.

#### 4.6 Malicious or false complaint




4.6.1 Any person found to have knowingly made false complaints of sexual harassment will be subject to disciplinary action, including termination of employment.


#### 4.6 Disciplinary Action

4.7.1 Disciplinary action will be initiated against an associate found to be guilty of the charges levelled against him/her, including reprimands, suspension or termination of employment besides initiating of any other legal action as per applicable laws.

#### 4.8 Criminal Proceedings

4.8.1 Where the conduct of an associate amounts to a specific offence under the IPC or under any other law in force, the Company shall provide assistance to an aggrieved associate if the associate chooses to file a complaint in relation to any such offence. The Company will further comply with any requirements in relation to external reporting of an IPC offence as may be stipulated by applicable law.

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## 5 Management Obligations

5.1 Management shall provide all necessary assistance for the purpose of ensuring full, effective and prompt implementation of this policy. It shall further be bound by the decisions of the Committee and shall implement the same expeditiously.

5.2 The support to be provided to IC:

- Secretarial and administrative support for training and other preventive/ redressal activities of the IC. Secretarial support during enquiry process in handling the complaints received under this Policy
- Adequate financial resources for all activities of the IC.
- Communicate the policy to all employees. Conduct awareness sessions on periodical basis.
- Always encourage respectful and dignified behaviour at workplace by all.
- Help the Complainant if the Complainant 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

### NOTE:

- The provisions of 'Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013' shall apply wherever this policy is silent. In case of any inconsistency between the Act/Rules and this Policy, the provisions of the Act/Rules will prevail
- Jodas Management reserves the right to make the changes at any time and from time to time in this policy and the regulations of the Committee within the ambit of the provisions of the Act or any other applicable regulations, in accordance with the guidelines provided by the State Government of Telangana/Government of India or the applicable rulings of the Hon'ble Supreme Court of India.

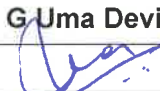


**Revision History:** First Version Document

**Policy Update Responsibility:** Corporate- HR

Annexure-1 Internal Complaints Committee Jodas Expoim Pvt Ltd

Annexure-2 Incident Report form

Annexure-3 Associate POSH training completion acknowledgement

	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
<b>Name</b>	G Uma Devi	Vinod Upadhyay	Satyendra Kumar Singh
<b>Signature</b>			
<b>Date &amp; Time</b>	20/01/2023	01/02/2023	03/02/2023

## Prevention of Sexual Harassment Policy – Internal Complaint Committee (ICC)

### Annexure A

Internal Complaint Committee (ICC) for Jodas Expolm Pvt Ltd from the year 2023 to 2025 is constituted as follows:

Sl.No	Role	Name	Location	Mobile Number	Email
1	Presiding Officer	Mrs. Gajjala Uma Devi	KPHB, Hyderabad	8247890448	umadevi@jodasexpolm.in
2	Member	Mr. Sravan Kumar Madderla	KPHB, Hyderabad	8008616464	m.sravan@jodasexpolm.in
3	Member	Mr. M Sreekanth Reddy	Karakapatla, Siddipet	9959310531	sreekanthreddy.m@jodasexpolm.in
4	Member	Mr. M.A.Krishna Kumar	Karakapatla, Siddipet	8886443246	makrishnakumar@jodasexpolm.in
5	Member	Mrs. Subhashini Bytinti	Karakapatla, Siddipet	9585092937	subhashini.b@jodasexpolm.in
6	Member	Mrs. Vattipally Prashanti	Karakapatla, Siddipet	9912871001	prashanti.v@jodasexpolm.in
7	External Member (Lawyer)	Mrs. Padma Shenoy	Malkajgiri, Hyderabad	9666640473	Nil

Mr. Satyendra Kumar Singh



Managing Director  
Jodas Expolm Pvt. Ltd.  
Date: 17-02-2023



**Please Note:** For detailed POSH policy document please visit Adrenalin –Company policies or check with team HR.

# Prevention of Sexual Harassment Policy



## Annexure B

### Incident Report Form

Name:

Address:

Phone:

Age:

Gender:

Email ID (Official & Personal):

Date and Time of the Incident:

Details of Incident:

Details of the accused (Name, Department, Location etc):

Documents Attached:

Signature:

Date:

## Annexure C

### ACKNOWLEDGMENT OF POSH TRAINING COMPLETION

I hereby acknowledge that I have received training through the presentation. I have also gone through the POSH policy of Jodas. I have good understanding of the policy.

I agree to abide by the policy that was explained in this training. I understand that if I have any questions about the training, materials presented or information not addressed in the training, or if I encounter any problems, it is my responsibility to seek clarification from the designated Human Resources team.

#### **Acknowledged:**

Associate Name:

Associate ID:

Department Name:

Date:

Signature of Associate:

IIR (Signature and Date):