



DECCAN TRANSCON LEASING LIMITED

Policy on Prevention of Sexual Harassment at the Workplace

Effective from 23rd July 2025

POLICY FOR PREVENTION OF SEXUAL HARASSMENT IN THE WORKPLACE ("POSH") FOR THE DECCAN TRANSCON GROUP OF COMPANIES ("DTG")

INTRODUCTION

This policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” and rules framed thereunder (hereinafter “the Act”). Accordingly, while the policy covers all the key aspects of the Act, for any further clarification, reference shall always be made to the Act and the provisions of the Act shall prevail.

It is clarified that though the Act specifically addresses sexual harassment of women in the workplace, in keeping with DTG's corporate ethos, **this policy will be a gender-neutral policy**. It is applicable and available across all companies and entities that fall within the DTG umbrella, to all Employees of DTG, whether they are full-time, part-time, contract workers or have any such engagement with DTG.

DTG is an equal employment opportunity company and is committed to creating a healthy working environment, free from prejudices based on race, religion, caste, gender, nationality, ethnic origin or disability. Thus, any harassment, especially sexual harassment against any person, within DTG, or any complaints of sexual harassment by an Employee of DTG with any person outside of DTG, will not be tolerated and be dealt with according to the provisions of this policy and the Act.

This policy is effective from 23rd July 2025 and supersedes any policy or directive in this regard made at any date prior to this one.

DEFINITIONS:

- 1) **“Sexual Harassment”** means and includes any unwelcome sexually determined behaviour or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed, such as but is not limited to:
- a) Unwelcome sexual advances involving verbal, non-verbal or physical conduct, implicit or explicit;
 - b) Physical contact and advances including (but not limited to) touching, stalking, molestation, and sounds which have explicit and/or implicit sexual connotation/overtones;
 - c) Teasing, Voyeurism, Eve teasing, innuendos and taunts with an implicit sexual connotation, physical confinement against a person's will or any such act likely to intrude upon one's privacy;
 - d) Demand or request for sexual favours directly or indirectly, whether verbally, implicitly or through any digital medium;
 - e) Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body, whether made verbally or in any written or digital form;
 - f) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas (including any digital medium of the work areas or DTG);
 - g) Showing pornography, making or posting vulgar/indecent/sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS and/or any other digital medium, gestures etc.
 - h) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
 - i) Giving gifts or leaving objects that are sexually suggestive;
 - j) Persistent watching, following, and/or contacting a person;
 - k) Posting sexually explicit or implicit content on a person or DTG's social media, whether for public viewing or as a private message or otherwise;

The following circumstances, if they occur or are present in relation to any sexually determined act or behaviour, amount to sexual harassment:

- l) Implied or explicit promise of preferential treatment in employment;
- m) Implied or explicit threat of detrimental treatment in employment;
- n) Implied or explicit threat about the present or future employment status;
- o) Interference with the person's work or creating an intimidating or offensive or hostile work environment; or
- p) Humiliating treatment likely to affect health or safety.

An alleged act of sexual harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the experience of the aggrieved person. However, it is clarified that every complaint of sexual harassment shall be dealt with in the manner outlined in this policy and the Act.

It is also clarified that sexual harassment may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee and someone that the employee deals within the course of his/her work who is not employed by the Company.

- 2) **"Aggrieved person"**: In relation to a workplace, 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) **"Complainant"**: Any aggrieved person who makes a complaint alleging sexual harassment under this policy.
- 4) **"Respondent"**: A person against whom a complaint of sexual harassment has been made by the aggrieved person under this policy
- 5) **"Employee"**: A person employed at the workplace, for any work on a regular, temporary, ad-hoc 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, a contract worker, probationer, trainee, apprentice or called by any other such name.
- 6) **Workplace:**
 - a) Premises, locations including digital locations & mediums, establishments, enterprises, institutions, offices, branches or units established, and subsidiaries which are controlled by DTG.
 - b) Places visited by the Employee arising out of or during the course of employment, including official events, including digital locations and mediums, accommodation and transportation provided by the employer for undertaking a journey.
- 7) **Employer:** A person responsible for management, supervision and control of the workplace

ROLES AND RESPONSIBILITIES

Responsibility for all: It is the responsibility of all to respect the rights of others and to never encourage harassment. It can be done by:

- a) Refusing to participate in any activity which constitutes harassment;
 - b) Supporting the person to reject unwelcome behaviour;
 - c) Acting as a witness if the person being harassed decides to lodge a complaint;
- 1) DTG encourages all its Employees to advise others of behaviour that is unwelcome. Often, some behaviours are not intentional. While this does not make the behaviour acceptable, such advice on unwelcome behaviour may give the person behaving inappropriately, the opportunity to modify or stop it.

2) Responsibilities of Managers: All managers at DTG must ensure that nobody is subject to harassment and there is equal treatment. They must also ensure that all employees understand that harassment will not be tolerated; that complaints will be taken seriously; and that the complainant, respondent/s, or witnesses are not victimized in any way.

INTERNAL COMPLAINTS COMMITTEE ("ICC")

- 1) To prevent instances of sexual harassment and to receive and effectively deal with complaints pertaining to the same, Internal Complaints Committees (ICC) have been appointed for the current offices of DTG in India (viz. Mumbai and Hyderabad). Any further offices, if they may so get added in India, will have separate ICCs. Any complaints from DTG office locations outside of India shall be handled by the Hyderabad ICC.
- 2) The details of the committee are notified at the respective location and have also been circulated via email to all Employees. It will be available for reference with Mrs. Karthika Menon.

Every ICC shall consist of:

- a) Presiding Officer: A woman employed at a senior level in DTG;
- b) At least 2 members among Employees, committed to the cause of women or who have had an experience in social work or have legal knowledge;
- c) One external member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment;

At least one-half of the total members of the IC nominated should be women;

- 3) The committee will be responsible for:
 - a) Receiving complaints of sexual harassment at the workplace;
 - b) Initiating and conducting an inquiry as per the established procedure;
 - c) Submitting findings and recommendations of inquiries;
 - d) Coordinating with the employer in implementing appropriate action;
 - e) Maintaining strict confidentiality throughout the process as per established guidelines;
 - f) Submitting annual reports in the prescribed format;
- 4) The current members of the ICC are given in Annexure — A herein;
- 5) It is clarified that in the event any IC member is directly related to, connected with and/or interested in the complainant or the respondent or is the one making or against whom such complaint is made, such IC member shall excuse himself or herself from all proceedings in relation to that particular complaint.
- 6) In the event, there is any doubt regarding the interest/possibility of bias of an IC member with regard to a particular complaint, such doubt will be referred to the Chairperson of the ICC, whose decision thereon shall be final and binding.
- 7) In the event of any vacancy on the ICC, by reason of termination of employment of any IC member before the expiry of their term, then such vacancy shall be filled within 15 days from the effective last date of the outgoing IC member. It is clarified that such substituted IC member's term shall last until the end of the term of the outgoing IC member.

GRIEVANCE REDRESSAL MECHANISM

If any Aggrieved person seeks to make a formal sexual harassment complaint under this policy or Act, they need to do the

following:

- 1) Submit a written complaint, detailing the incident (s) and any documentary or other available evidence to posh_ic@deccantrans.com and/or any member of the ICC, then such complaint must be reduced in writing.
- 2) The Complaint must be lodged within three (3) months of the occurrence of an act of Sexual Harassment. However, the ICC can extend the timeline by another three (3) months for reasons recorded in writing, if satisfied that there was sufficient cause that prevented the lodging of the complaint within the 3-month time frame.
- 3) In the event a complaint cannot be made in writing, the Presiding Officer or any Member of the ICC shall render all reasonable assistance to the aggrieved person for making the complaint in writing.
- 4) If the aggrieved person cannot lodge the complaint on account of his/her incapacity, the following may do so on her behalf, with such person's written consent.
 - Legal heir, relative or friend
 - Co-worker
 - Any person having knowledge of the incident

If the initial complaint is made to a person other than an ICC member, upon receiving such a complaint, it will be the responsibility of the complaint receiver to report the same to the ICC immediately.

- 5) If the respondent is the direct supervisor of the complainant, or a person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.
- 6) Wherever possible, DTG shall ensure that all the complaints of harassment are dealt with speedily, discreetly and as close as possible to the point of origin.

COMPLAINT REDRESSAL METHOD

1) Resolution procedure through conciliation

- A. Once the complaint is received, before initiating the inquiry the ICC shall, if requested by the Aggrieved person, seek to resolve the issue through conciliation; Do note that conciliation in itself doesn't necessarily mean acceptance of a complaint by the respondent. It is simply a practical mechanism through which issues may be resolved or misunderstandings cleared.
- B. Conciliation proceedings must be started within 3 days of receipt of the complaint and the entire process must be finished within 2 weeks from the date of thereof, provided that the ICC may, in writing, accord a further period of two weeks, if there is sufficient cause to do so. However, the ICC must record their reasons for granting such a time extension in writing before the said extension of time is effected.
- C. In case a settlement is arrived at, the ICC records & reports the same to the employer for taking appropriate action.
- D. The ICC shall provide copies of the settlement arrived at through conciliation to the complainant & respondent. Once a settlement is arrived at, no further inquiry will be conducted.

2) Resolution procedure through formal inquiry:

The ICC shall initiate an inquiry in the following cases:

- A. Conciliation is NOT requested by the aggrieved person;

B. The conciliation procedure did not result in any settlement;

C. The complainant informs the ICC that the Respondent has failed or neglected to comply with any term or condition of the settlement.

In such cases, the ICC shall commence making an inquiry within one (11 week from its receipt of the original complaint/closure of conciliation/repeat complaint.

METHOD OF INQUIRY INTO COMPLAINT

- 1) The complainant should submit six (6) copies of the complaint along with supporting documents and the names of the witnesses to the ICC;
- 2) Within 7 working days of the receipt of the complaint, the ICC shall send one copy of the complaint to the respondent;
- 3) Within 10 working days from the date of receipt of the complaint, the respondent shall reply to the same with supporting documents if any;
- 4) No legal practitioner can represent any party at any stage of the inquiry procedure
- 5) The ICC shall make their inquiry into the complaint in accordance with the principles of natural justice, viz., that the ICC shall afford equal opportunity for both parties to be heard, to represent their case without any bias, and to provide reasonable notice of any proceeding or decision in the matter;
- 6) Quorum:

In conducting the inquiry, a minimum of three committee members, including the Presiding Officer, shall be present.

- 7) Inquiry Procedure:
 - a) The ICC shall document all proceedings of the inquiry. They shall state exactly what the allegation is and who has made the allegation.
 - b) The ICC shall interview the respondent separately and impartially and provide full opportunity to the respondent to respond and/or provide any evidence etc.
 - c) The ICC shall maintain detailed notes of the meetings which may be shared with the respondent and complainant upon request.
 - d) Any witnesses produced by either party are also interviewed & their statements shall be recorded.
 - e) The ICC shall facilitate any cross-examination of any witness by either party, if so requested by such party and the proceedings shall be recorded verbatim;
 - f) In the event one party seeks to question the other party, they may, if they so choose to do, give these questions to the ICC, who can, in turn, ask them on behalf of the questioning party; All answers to such questions will be recorded verbatim;

- 8) Powers of civil court:

The ICC shall have all powers of a civil court while making an inquiry, including the power to summon witnesses, enforce the attendance of persons, require production and discovery of documents etc.

- 9) Termination of Inquiry + ex-parte decision:

The ICC shall be empowered to terminate the inquiry and give an ex parte decision in the event that either the complainant or respondent fails, without cause, to present themselves for three consecutive hearings before the ICC. However, it is clarified that before such termination can be effected, the ICC must provide written notice in this regard of at least 15 days to the party concerned.

10) Time limit for completing Inquiry:

The ICC shall complete any inquiry, including submission of inquiry report within 90 days from the date of commencement of the inquiry.

INTERIM RELIEF

During the pendency of the inquiry, on a written request made by the complainant, the ICC may recommend to the employer to —

- a) Transfer the complainant or the respondent to any other workplace;
- b) Grant leave to the aggrieved person for a maximum of three (3) months, which leave shall be in addition to the leave he/she would be otherwise entitled;
- c) Prevent the respondent from assessing the complainant's work performance
- d) Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the employer will inform the ICC regarding the same;

RESULTS OF THE INQUIRY REPORT

- 1) Within 10 days from the date of completion of the inquiry, the ICC shall submit an Inquiry report to the Employer and each of the parties;
- 2) Points to consider:

While preparing the findings/recommendations, the ICC shall consider the following:

- A. Whether the language used (written or spoken), visual material or physical behaviour was of sexual or derogatory nature?
 - B. Whether the allegations or events follow logically and reasonably from the evidence presented?
 - C. The credibility of the complainant, respondent, witnesses and evidence;
 - D. Other similar facts and evidence, for example, have there been any previous accounts of harassment pertaining to the respondent?
 - E. Were principles of natural justice followed while conducting the inquiry?
- 3) On completion of the inquiry, if the ICC is of the opinion that the allegation against the respondent has not been proved, it shall recommend to the employer that no action needs to be taken;
 - 4) *Penalties:* On completion of the inquiry, if the ICC is of the opinion that the allegation against the respondent has been proved, it shall recommend to the Employer to —
 - A. Take action against the respondent, which may include
 - i) Withholding promotion or increments;
 - ii) Written apology to the complainant;

- iii) Censure or reprimand;
- iv) Termination of service;
- v) Suspension of service for a temporary period;
- vi) Counselling.

And any such other action that the ICC may deem appropriate;

- B. Direct the employer to deduct such specified sum from the respondent's salary as the ICC deems appropriate to pay as compensation to the aggrieved person. In the event the sum granted to the aggrieved person is in excess of the respondent's salary, then the ICC shall direct the respondent to pay such a sum to the complainant.
- C. The employer must take such action as recommended by the ICC within 60 days from the date of the Inquiry report and inform the ICC of the same.
- D. ***Malicious allocations:*** If the ICC finds that the complaint was made maliciously, or that the complainant has made the complaint knowing it to be false, or has produced false/forged/misleading documents as evidence, then the ICC is empowered to treat the complaint as a malicious complaint. The ICC shall then recommend such appropriate penalty for this as it deems fit, in a manner similar to that set out in clause 4 (a) of this section above;
- E. It is clarified that malicious intent must be clearly established through the inquiry, and a mere inability to substantiate the complaint need not mean malicious intent.

CONFIDENTIALITY

All proceedings, details of the complaint, identity of the complainant, respondent, witnesses, statements and other evidence obtained in the course of the inquiry process, recommendations of the ICC, and action taken by the employer shall be kept in strict confidence and shall be considered as confidential materials. The same shall not be published or made known to the public or media. Any person contravening this confidentiality provision shall be subject to disciplinary action as prescribed in the Act.

ANNEXURE A

DETAILS OF CURRENT INTERNAL COMPLAINTS COMMITTEE (ICC)

Sl. No.	Name of Person	ICC position	Designation within DTG
1.	Ms. Karthika Menon	Presiding Officer/ Chairperson	Head of HR
2.	Ms. Khushboo Gautam	Member	Company Secretary & Compliance Officer
3.	Ms. Krishnaveni Bhoga	Member	Sr. Manager - HR
4.	Ms. Prachi Rahul	Member	AGM- Pricing & Analytics, Operations
5.	Mr. Navaneeth Jaidev	Member	CTO
6.	Ms. Tseten Choden	External Member	Corporate Lawyer and CS, POSH Trainer