GUJARAT VICTORY FORGINGS LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

[ADOPTED BY BOARD ON 12TH MARCH, 2026]

DESCRIPTION OF DOCUMENT: *This document provides a brief description of the Policy on Prevention of Sexual Harassment at Workplace at Gujarat Victory Forgings Limited.*

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POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

1. Introduction

1.1. Gujarat Victory Forgings Limited ("**Company**") considers the Prevention Of sexual harassment in the workplace to be a core component of the Management of the Company and is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

1.2. This Prevention Of sexual harassment in the Workplace Policy ("**Policy**") applies to all categories of employees of the Company, including permanent employees, temporary employees, trainees and employees on contract at their workplace or at client sites and any person responsible for the management, supervision and control of the workplace. The Company will not tolerate sexual harassment, if engaged in, by any employee or co-worker of the Company, its clients or by suppliers or any other business associate

1.3. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment on the basis of their gender.

1.4. This Policy has been formulated pursuant to, and shall be read together with, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (together, the "POSH Act"), which constitute the statutory basis of this Policy.

2. Effective Date

This policy will come into effect from the date of its adoption by the Board.

3. Objectives and Purpose

3.1. This Policy has been framed in line with the Company's objective towards providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment and The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

4. Definition of sexual harassment:

4.1. Sexual harassment may be one or a series of incidents involving unsolicited and unwelcomed sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

4.2. Sexual Harassment at the workplace includes:

a) unwelcomed sexual advances (verbal, written or physical),

b) demand or request for sexual favours,

c) Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body;

d) Showing pornography, making or posting sexual pranks, sexual teasing, sexual jokes, sexually demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS etc.

e) verbal abuse or 'joking' that is sex-oriented;

f) any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is

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either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions;

g) any other type of sexually- oriented conduct.

4.3. For the purposes of this Policy: (a) "Aggrieved Woman" means a woman of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment; (b) "Employee" means a person employed at the workplace for any work, on a regular, temporary, ad hoc or daily wage basis, whether directly or through an agent, and includes a co-worker, a contract worker, probationer, trainee, apprentice, or a person called by any other name; (c) "Employer" means the head of the organisation, or the person responsible for the management, supervision and control of the workplace, or the person discharging contractual obligations with respect to their employees; and (d) "Workplace" includes any department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the Company, and any place visited by an employee arising out of or during the course of employment, including transportation provided by the Company for the purpose of commuting to and from the place of employment, each as defined under the POSH Act.

5. Responsibilities regarding sexual harassment:

5.1. Management has a general responsibility to ensure that all allegations of sexual harassment are handled sensitively, with respect for the dignity of the persons involved.

5.2. Management has an additional duty to ensure a safe and secure workplace, and if there is any indication that there may be a physical threat of danger to any person, professional advice should be sought from internal persons responsible for safety and security, and where appropriate from external authorities and professional persons.

5.3. Management is responsible for ensuring that the allegations are dealt with timeously, with due seriousness and confidentiality; and that the allegations are dealt with in a manner which achieves a resolution of the behaviour, rather than in a mechanistic procedural manner.

6. Complaint mechanism:

An appropriate complaint mechanism in the form of Internal complaints committee has been created in the Company for time-bound redressal of the complaint made by the victim.

7. Internal Complaints Committee:

7.1. The Company has constituted a Internal complaints committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

7.2. Initially, and till further notice, the Internal Complaints Committee will comprise of the following four members, constituted in accordance with Section 4(2) of the POSH Act:

a) Presiding Officer: A woman employed at a senior level in the organization or workplace from amongst the employees;

b) At least 2 members from amongst employees, committed to the cause of women or have had experience in social work or having legal knowledge;

c) One 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.

d) At least one half of the total members shall consist of women.

7.3. The present composition of the Internal Complaints Committee (including the name and designation of the

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Presiding Officer and each other member) shall be communicated to all employees and displayed at conspicuous places in the workplace, in accordance with Section 4(3) of the POSH Act: [D&D Note: Company to insert the names and designations of the current Internal Complaints Committee members].

7.4. The Internal complaints committee is responsible for:

a) Receiving complaints about sexual harassment at workplace;

b) Investigating every formal written complaint of sexual harassment;

c) Coordinating with employer in implementing appropriate action;

d) Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment;

e) Discouraging and preventing employment-related sexual harassment.

8. Procedures for resolution, settlement or prosecution of acts of sexual harassment:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

8.1. Informal Resolution Options

- When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

- If the harassment does not stop or if the victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Complaints Committee for redressal of their grievances. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.

8.2. The aggrieved person may request the Internal Complaints Committee to take steps to resolve the matter through conciliation before the investigation process is initiated. However, no monetary consideration shall be made as the basis for such conciliation. If a settlement has so arrived, the Internal Complaints Committee will record the settlement details and send them to the aggrieved person and the respondent. In such cases, no further inquiry shall be conducted by the Internal Complaints Committee, in accordance with Section 10 of the POSH Act.

8.3. Complaints:

- An employee with a harassment concern, who is not comfortable with the informal resolution options or has exhausted such options, may make a formal complaint to the Presiding Officer of the Internal Complaints Committee constituted by the Company. The complaint shall have to be in writing and can be in the form of a letter, preferably within fifteen (15) days from the date of occurrence of the alleged incident and in case of a series of incidents, within fifteen (15) days from the occurrence of last alleged incident, sent in a sealed envelope, but no later than three months from the date of incident and in case of a series of incidents, no later than three months from the date of last incident (The Complaints Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the employee from filing a complaint within the said period.). Alternately, the employee can send the complaint through an email. The employee is required to disclose their name, department, division and location they are working in, to enable the Presiding Officer to contact them and take the matter forward.

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- The Presiding Officer of the Internal Complaints Committee will proceed to determine whether the allegations (assuming them to be true only for the purpose of this determination) made in the complaint fall under the purview of Sexual Harassment, preferably within thirty (30) days from receipt of the complaint.

- In the event, the allegation does not fall under the purview of Sexual Harassment or the allegation does not constitute an offence of Sexual Harassment, the Presiding Officer will record this finding with reasons and communicate the same to the complainant.

- If the Presiding Officer of the Internal Complaints Committee determines that the allegations constitute an act of sexual harassment, she will proceed to investigate the allegation with the assistance of the Complaints Committee.

- Where such conduct, on the part of the accused, amounts to a specific offence under the law, the Company shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

8.4. The Internal Complaints Committee shall complete its inquiry into the complaint within ninety (90) days from the date of receipt of the complaint, in accordance with Section 11(4) of the POSH Act. The Internal Complaints Committee shall, within ten (10) days of completing the inquiry, provide its report, along with its recommendations, to the employer, in accordance with Section 13(1) of the POSH Act. The employer (being, for the purposes of this Policy, any individual entrusted with the management, supervision, and control of the workplace, including boards or committees responsible for policy administration) shall act upon the recommendations of the Internal Complaints Committee within sixty (60) days of receipt of the report, in accordance with Section 13(3) and 13(4) of the POSH Act, and shall keep the complainant informed of the same.

8.5. Corrective action may include any of the following:

- Formal apology.
- Counselling.
- Conciliation.
- Written warning to the perpetrator and a copy of it maintained in the employee's file.
- Change of work assignment / transfer for either the perpetrator or the victim.
- Suspension or termination of services of the employee found guilty of the offence.

8.6. In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

9. Annual Disclosures

9.1. The Internal Complaints Committee shall prepare an annual report setting out the number of complaints of sexual harassment received and disposed of during the year, and submit the same to the employer, who shall include the said particulars in the Company's Annual Report, in accordance with Section 21 of the POSH Act, Rule 8(5)(x) of the Companies (Accounts) Rules, 2014, and Schedule V, Part C, Clause 10(l) of the SEBI Listing Regulations (as and when applicable to the Company).

10. Confidentiality

10.1. The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

10.2. To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate

under the circumstances.

11. Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

12. Protection to complainant / victim

12.1. The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

12.2. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

12.3. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

13. Conclusion

In conclusion, the Company reiterates its commitment to providing its employees a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

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Date of the approval by the Board: **12th March, 2026**

For and on behalf of Board
Gujarat Victory Forgings Limited
(Formerly Known as Gujarat Victory Forgings Private Limited)

GUJARAT VICTORY FORGINGS LIMITED

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