



APL Apollo Tubes Limited.

Prevention of Sexual Harassment (POSH) Policy

Last Revision Date: 1 Oct 2025

1. Objective

APL Apollo Tubes Limited ("Company") is committed to providing a safe, respectful, and inclusive workplace free from all forms of sexual harassment.

This Policy has been formulated in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the "Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (the "Rules"). While this Policy seeks to address and incorporate the essential provisions of the Act and the Rules, in the event of any ambiguity, conflict, or need for further interpretation, reference shall be made to the Act and the Rules, and the provisions contained therein shall prevail.

This Policy is not only compliant with the requirements under the Act and the Rules but also extends beyond the statutory framework to acknowledge and address the risks and vulnerabilities faced by individuals across all genders. Accordingly, this Policy is gender neutral in its application and intent.

For the purpose of ensuring effective implementation of this Policy, and unless expressly excluded or stated otherwise, the provisions of the Act and the Rules shall apply mutatis mutandis to all complaints of sexual harassment received by the organization, irrespective of the gender of the aggrieved individual.

2. Scope

This Policy is applicable to all employees of APL Apollo Tubes Ltd. and its subsidiaries, including on-roll, contractual, trainees, interns, consultants, and any third-party personnel working at or visiting Company locations.

It covers all workplaces associated with the Company, including manufacturing units, Corporate Office, sales branches, project sites, guest houses, hotels, company-provided transportation, virtual work environments, video calls, and any location visited by an employee in the course of employment or for any Company-related activity.

3. Definitions

1. **Aggrieved party:** Any person (irrespective of gender), whether employed or not, who alleges to have been subjected to sexual harassment.
2. **Complainant:** The aggrieved person who files a Complaint to the IC. This also includes a representative who files the complaint on behalf of an aggrieved person who is incapacitated, as permitted under the POSH Act and Rules.
3. **Workplace:** In addition to the place of work, it extends to any place visited by the employee arising out of or during the course of employment and includes transportation provided by the employer for undertaking such journey. In case an employee is travelling on Company businesses, Hotel or Company's Guest House wherever the employee is staying, places visited etc. will be considered as workplace. It also extends to phone calls and messages sent through cellular phones, email or other

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electronic forms from locations outside of a physical workplace at any time as well as other contact outside office hours and interaction with company employees, vendors, trainees, interns, customers and contractors.

4. Sexual Harassment: "Sexual harassment" includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely.

- Physical contact and advances;
- A demand or request for sexual favours;
- Making sexually coloured remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
- The following circumstances, in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment (not an exhaustive list).
- Implied or explicit promise of preferential treatment in their employment.
- Implied or explicit threat of detrimental treatment in their employment.
- Implied or explicit threat about their present or future employment status.
- Interferes with their work or creates an intimidating, hostile or offensive work environment.
- Humiliating treatment likely to affect their health or safety.

While it is not possible to list all circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment:

- Sexually coloured remarks, jokes, comments, messages or emails.
- Display of pictures, signs, etc. with sexual content/ connotation/ overtones in the work area and work- related areas.
- Teasing, innuendos and taunts, physical confinement and/or touching against one's will and likely to intrude upon one's privacy.
- Gender-based insults, intimidation, humiliation, or derogatory behaviour.
- Stalking through digital platforms e.g. copying profile photos without consent, sending repeated messages, commenting on photos posted on social media without consent.
- Taking screen captures during video calls without consent or circulating it on social media.

4. Internal Committee (IC)

An IC shall be constituted by the employer by means of an office order at the corporate level and plant/location-specific ICs where applicable. Details of the Internal Committee (IC) for each location are displayed at conspicuous places at Company workplaces and are available with HR.

All the complaints of sexual harassment shall be submitted to IC. Guidelines for the formation of the committee are given below.

1. At least 50% of the IC members should be women,
2. The Presiding Officer of the committee should be a lady employee at a senior level,

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3. At least two (2) members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.
4. External member should be from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment. The External Member shall be paid fees/allowances as per statutory provisions and company policy.
5. The IC shall prepare and submit an Annual POSH Report to the employer every calendar year, as required under the POSH Act.
6. The employer shall file the POSH Annual Compliance Report with the District Officer.

5. Procedure for Complaint

1. If any aggrieved person believes to have been subjected to sexual harassment, he/she/they can approach IC at his/her/their region/location and may file a complaint with the IC of the relevant location.
2. The complaint should preferably be made in writing within three (3) months from the date of occurrence of an incident/last incident. Where required, the IC may extend this limit in accordance with applicable law.
3. Where an aggrieved person is unable to make a complaint on account of physical incapacity, it may be submitted by a representative in accordance with applicable law.

6. Conciliation

Before initiating a formal inquiry, the Internal Committee (IC) may, at the request of the aggrieved person, attempt to resolve the matter through conciliation. No monetary settlement shall be made as the basis of conciliation.

Where a settlement is arrived at, the IC shall record the same and share it with the concerned parties. In such cases, no further inquiry shall be conducted by the IC.

7. Procedure of Inquiry

Where conciliation is not feasible, not agreed upon, or where the terms of settlement are not complied with, the Internal Committee (IC) shall conduct a formal inquiry into the complaint.

The inquiry shall be conducted in a fair and unbiased manner, in accordance with the principles of natural justice, ensuring that both parties are given a reasonable opportunity to be heard and to present relevant information.

Upon completion of the inquiry, the IC shall submit its findings to the Employer and communicate the outcome to the concerned parties within the timelines prescribed under applicable law.

8. Interim Measures/Interim Relief During Inquiry

During the pendency of an inquiry, the Internal Committee (IC) may recommend appropriate interim measures to ensure a safe, fair and non-retaliatory work environment for the concerned parties.

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Such measures may include temporary changes in reporting, supervision, or workplace arrangements, or any other relief considered necessary under applicable law. The Employer shall act on such recommendations in accordance with statutory requirements.

9. Prohibition of Publication

The contents of any complaint, identity and address of the aggrieved person, respondent and witnesses, as well as details of the inquiry proceedings, recommendations of the IC, and the action taken by the Company shall be kept strictly confidential and shall not be disclosed to the public or media.

However, information relating to the implementation of justice may be shared, without disclosing any information that may lead to the identification of the aggrieved person or witnesses, in accordance with applicable law.

10. Confidentiality

Maintaining confidentiality is a key requirement under the POSH Act, 2013. APL Apollo Tubes Limited is fully committed to protecting the privacy, dignity and rights of all individuals involved in the complaint and inquiry process.

Strict confidentiality is maintained at every stage of the proceedings to ensure a safe, fair, and unbiased environment in accordance with applicable law.

11. Findings of IC

An inquiry may result in one of the following conclusions:

1. Where the allegation is established, the IC shall recommend appropriate action to the employer in accordance with applicable law and Company policy.
2. Where the allegation is not established, the IC shall recommend that no action is required.
3. If, after due inquiry, a complaint is found to be malicious or intentionally false, the IC may recommend appropriate action in accordance with applicable law.
A complaint shall not be considered malicious merely because it could not be substantiated.

Upon completion of the inquiry, the IC shall submit its report to the Employer, who shall act on the recommendations within the timelines prescribed under applicable law.

12. Appeal

Any person aggrieved by the recommendations of the IC or by the non-implementation of such recommendations may prefer an appeal under the applicable provisions of the POSH Act and Rules.

13. Employer's Role

The Company is committed to providing a safe, respectful, and inclusive workplace. In this regard, the Employer shall:

- Maintain a work environment free from sexual harassment.

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- Constitute Internal Committees (ICs) in accordance with applicable law and display required information at workplaces.
- Conduct periodic awareness and training programs for employees as well as IC members.
- Provide necessary support and resources to the IC for effective handling of complaints.
- Take appropriate action on the recommendations of the IC, in accordance with applicable law.

14. Employee's Role

The employees shall have responsibility for:

- Familiarize themselves with and comply with the Company's POSH Policy.
- Participate in awareness and training programs.
- Speak up or report concerns if they experience or witness sexual harassment.
- Maintain confidentiality and cooperate with the Internal Committee during any inquiry.

For: APL Apollo Tubes Limited

Approved & Authorized By



Pankaj Sharma
Chief Human Resources Officer