

Corporate Compliance & Social Responsibility Department	Sexual Harassment Grievance Redressal Policy	Doc no. LWT/ HRP/ SHGRP/ 22062023/ 00
		Version: 0
		Revision: 1
		Revision date: 22-06-2023

Sexual Harassment Grievance Redressal Policy

The enterprise was incorporated in the year April 2004, has matured competencies in embedded electronics, radio frequencies technologies, information technology software development, electrical controls & automation and is India's one of the preferred turnkey providers for industrial automation technologies for Power, Steel, Port, Mining and Transport Sector.

To know more about us kindly visit our website – www.lotuswireless.com

1. Objective

This policy states the procedure for the resolution, settlement, or prosecution of acts of sexual harassment by taking necessary steps as governed by the **Vishaka Guidelines & POSH Act** laid down by the government of India

2. Scope

The grievance mechanism procedure applies to all external stakeholders of our operations & this procedure also cover grievances raised by internal stakeholders, such as employee (fixed or variable cost both).

3. Eligibility

This policy covers shall cover all categories of employees i.e. permanent/ regular, outsourced, workers in plants, temporary workers, all categories of trainees, employees on contract, expatriates and any category included in any amendment henceforth also includes 3rd party such as customers and clients of group & subsidiaries

4. Policy Statement

Lotus Wireless Technologies India Private Limited follows a “zero-tolerance” policy on sexual harassment and is committed in its duty as an employer to prevent and deter the commission of acts of sexual harassment. Sexual Harassment is “misconduct” and all employees have the right to report any untoward incident in this regard, as a witness or a victim. Where such misconduct is a specific offence under the Indian Penal Code or under any other law, the concerned authorities shall initiate appropriate action in accordance with law. Victims and witnesses shall not be victimized or discriminated against while dealing with complaints of sexual harassment.

False accusations are discouraged and shall also be dealt with very strictly and Head Peoples Officer reserves the right to initiate appropriate disciplinary steps if any false accusations are found to have been made.

Where sexual harassment occurs as a result of an act or omission by any 3rd party or outsider, the employer and person in charge will take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

5. Definition as given by Supreme Court of India

Sexual harassment includes such unwelcome sexually determined behaviour (whether directly or by implication; whether by words or actions) as:

- Physical contact and advances
- A demand or request for sexual favours
- Sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

This definition in its broadest sense also includes many forms of offensive behaviour, including harassment of a person of the same sex, conduct that creates an offensive work environment, and misuse of power and position in the workplace.

6. Definition Explanation

Sexual Harassment takes place if a person(s):

- a. Subjects another person to an unwelcome act of physical intimacy, like grabbing, brushing, touching,

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pinching etc.

- b. Makes an unwelcome demand or request for sexual favours from another person
- c. Makes an unwelcome remark with sexual connotations, like sexually explicit compliments/ cracking loud jokes with sexual connotations/ making sexist remarks etc.
- d. Shows a person any sexually explicit visual material, in the form of pictures/cartoons/pinups/ Calendars / screen savers on computers/any offensive written material/pornographic emails, etc.
- e. A group of workers to joke and snigger amongst themselves about sexual conduct in an attempt to humiliate or embarrass another person
- f. Uses foul, unlawful, degrading and obscene language in the presence of colleagues, employees or customers, within the premises

7. Reporting Violations

If an employee feels that she has been the victim of sexual harassment, the employee must report the matter in confidence immediately to Head Peoples Officer, using any means of communication written or verbal. Anonymous reporting is allowed provided enough information about the violation is given for an effective investigation.

The company will not tolerate any retaliation/ penalization against any individual for bringing forth a complaint or participating in any investigation regarding a complaint and confidentiality & discretion will be always maintained.

The company will take all appropriate steps, including disciplinary action, to stop the offensive or inappropriate behaviour.

The accused employee has the right to defend himself and will be given a fair chance to clarify his/ her stance. Any employee who feels that he or she has been subjected to or falsely accused of harassment should report the same to the Head Peoples Officer.

All complaints will be investigated within 15 days of the receipt of the same.

Where conduct complained of is severe or of a pervasive nature, appropriate disciplinary action leading to immediate suspension (without pay - at the discretion of the Head Peoples Officer) will be taken.

No reprisal, retaliation, or other adverse action will be taken against any employee who in good faith reports any discrimination or harassment or assists in the investigation of any such matter.

8. Grievance Reporting Channels

Lotus Wireless Technologies India Private Limited will communicate this procedure to its external & internal stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances.

Key channel for internal as well as external stakeholders to vocalize their grievance can be done way by writing into the electronic mail, I'd compliance.grievance@lotuswireless.com

9. Appeal

If the internal/ external stakeholder is unhappy with the resolution and/ or does not agree with the proposed actions, then the stakeholder officer needs to escalate the matter to the grievance committee. The committee will review the grievance and all documentation gathered throughout the investigation and determines whether further actions are required to resolve the grievance.

Company is fully committed to resolving an internal/ external stakeholder's grievance so if company is unable to resolve a complaint or a stakeholder is unhappy with the outcome, company may seek advice from other independent parties

10. Storing of Grievances

All records, including grievance forms, investigation notes, interviews and minutes of meetings will be securely filed with confidentiality for all parties involved

11. Complaints Committee

Anyone found guilty of sexual harassment shall be subject to severe disciplinary action and the decision of Head Peoples Officer shall be final in this regard. The Head Peoples Officer has discretionary powers to appoint an

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enquiry officer/ complaints committee, members of which will be chosen on a case-to-case basis
Office & officials responsible shall be as detailed below:

- Grievance committee: Shall comprise of minimum 2 number company directors, chief of finance & chief of human resources as decided by chairman's office
- The Chairperson who will head this grievance committee would also be prominent senior female staff member nominated by company chairman & managing director's office
- Stakeholder contact officer: The regional leader for the North/ East/ West/ South regional offices

Sr no.	Nominated Designation	Name	Company Designation
1	Chairperson	Ms Sirisha Pujari	Technical Leader
2	Member	Mr Vijay Kammela	Company Director
3	Member	Mr Alok Chandna	Senior Vice President
4	Member	Mr NCSV Raju	Head Peoples Officer
5	Member	Mr VR Vinayaka Appa Rao	Production Head
6	Member (external)	Ms Teena Singh	From Local NGO

Lotus Wireless Technologies India Private Limited

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“Grievance Lodgement Form”

Full name:							
Father’s name:							
Aadhaar card number:							
Company name (if applicable):							
Date of first information:							
Time of first information:							
Communication postal address:							
Electronic mail I’d:							
Handphone number (with country code):							
Preferred media of communication:	Handphone		Electronic mail		Postal address		Others
Supporting document provided:	Yes				No		
Description of grievance (you can use additional sheet):							
What outcome are you seeking?							
Additional information (if any applicable):							

For office use only:

Stake holder reference											
Internal			Fix cost employee		Yes/ No			Variable cost/ contract employee		Yes/ No	
External	NGO	Yes/ No	Community/ Neighbourhood	Yes/ No	Political party/ personnel	Yes/ No	Government state/ central	Yes/ No	Supplier/ Contractor	Yes/ No	
Others											
Additional comments (if any)											

Claimant signature with date & place

Company representative signature with date & place

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“Grievance Register”

Stakeholder (name)	Date received	Stakeholder contact officer (name)	Grievance severity (Level 1 or 2)	Grievance description	Cause of grievance	Outcome	If a resolution was offered, kindly indicate “accepted” or “not accepted”	Remarks if any

Controlled Copy

Category	Description	Grievance Owner
Level 1	When an answer can be provided immediately and/ or company is already working on a resolution (only formal grievances to be lodged in the “grievance register”)	Stakeholder officer
Level 2	Repeated, extensive and serious grievances that may jeopardize the reputation of company	Grievance committee