

APOLLO'S POLICY ON PREVENTION OF

SEXUAL HARASSMENT AT WORKPLACE

APOLLO MICRO SYSTEMS LIMITED

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CIN No: L72200TG1997PLC026556

APOLLO'S POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

I. OBJECTIVE:

The objective of Apollo's Policy on Prevention of Sexual Harassment at Workplace (hereinafter referred to as the "Policy") is to provide protection against sexual harassment of employee at workplace and for the prevention and Redressal of complaints of sexual harassment and for matters incidental and connected therewith.

II. COMMITMENT:

Apollo Micro Systems Limited (hereinafter referred to as the "Company") is committed to provide work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment. 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 and will not tolerate any form of sexual harassment and to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

Thus, in order to create a safe and conducive work environment, this policy has been framed in line with "**Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**" of India (hereinafter referred to as the "**Act**") and existing rules framed there under namely the "**Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013**" (hereinafter referred to as the "**Rules**")

III. SCOPE:

Policy with regard to Prevention, Prohibition and Redressal of Sexual Harassment covers every "employee" across the Company. This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, trainees and employees on contract at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

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The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.

IV. **IMPORTANT DEFINITIONS**

(a) "Aggrieved Individual" means in relation to a workplace, a person, of any age, whether employed or not, who alleges to have been subject to any act of sexual harassment by the respondent and includes contractual, temporary employees and visitors.

(b) "Complainant" is any aggrieved individual (including a representative as more fully described under Rule 6 of the said Rules, if the aggrieved individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

(c) "Employee" as defined under the Act and means a person employed with the Company for any work on permanent, temporary, part-time, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, who 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 expressed or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.

(d) "Employer" means person who are responsible for management, supervision and control of the workplace including appointment/removal/termination of employees and will include 'Director and General Manager', and 'Chief Operating Officer (COO)'.

(e) "Internal Committee" means and include an Internal Complaints Committee (hereinafter referred to as the "ICC").

(f) "Member" means a member of the ICC.

(g) "Presiding officer" means the presiding officer of the ICC and shall be a woman employed at a senior level at the workplace amongst the employees.

(h) 'Respondent' means a person against whom a complaint of alleging sexual harassment has been made under this policy.

(i) "Parties" means collectively the complainant and the respondent.

(j) "Sexual Harassment" includes any one or more of the following unwelcome acts of behavior (whether directly or by implication):

A. Any unwelcome sexually determined behavior or pattern of conduct that would causediscomfort and/or humiliate a person at whom the behavior or conduct was directed namely

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(i) Physical contact and advances;

(ii) Demand or request for sexual favours;

iii) making sexually colored remarks or remarks of sexual nature about a person's clothing or body;

(iv) showing pornography;

(v) Any other unwelcome physical, visual, verbal or non-verbal conduct of sexual nature including but not limited to cat-call, wolf/finger whistle, vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures etc.

Sexual harassment can involve a series of incidents or it can be a one-off occurrence.

B. The following circumstances, among other circumstances, if it occurs or is present in relation to connected with any act or behavior of sexual harassment may amount to sexual harassment:-

-Implied or explicit promise of preferential treatment in employment; or

-Implied or explicit threat of detrimental treatment in employment; or

-Implied or explicit threat about the present or future employment status; or

-Interference with work or creating an intimidating or offensive or hostile work environmentfor the person; or

-Humiliating treatment affecting any person's health or safety.

(k) "Workplace" means establishments, enterprises, institutions, offices, branches, premises, locations or units established, owned, controlled by the Company or places visited by the employees out of or during the course of employment including accommodation, transportation provided by the employer for undertaking such journey

V. RESPONSIBILITIES REGARDING BEHAVIOR OF EMPLOYEES:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy.

All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

VI. 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.

VII. COMPOSITION OF INTERNAL COMPLAINTS COMMITTEE:

Pursuant to the relevant provisions of the Act, an Internal Complaints Committee (“ICC”) has been constituted to prevent and for Redressal of sexual harassment complaint (made by the aggrieved Individual) and for ensuring time bound treatment of such complaints.

The internal complaints committee shall consist of the following members to be nominated by the employer:

1. a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees:
2. not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
3. one member from amongst non-Governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment:

Provided that at least one-half of the total Members so nominated shall be women.

The Composition of the ICC of the Company is as follows:

S. No	Name	Designation	E-mail Id
1.	Ms. Supriya Kondap	Presiding Officer	supriya@apollo-micro.com
2.	K.C Satyanarayana	Member	kcs@apollo-micro.com
3.	Paruchuri Jyothsna	Member	cad_ams@apollo-micro.com
4.	Jyothsna Ponugupati	Member	hr@apollo-micro.com
5.	Mr. G.B.S Prakash	External Member	gbs.prakash@yahoo.co.in

**Employer will not form a part of ICC*

The Complaints Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

VIII. RAISING OF COMPLAINT

(1) Any aggrieved individual may make in writing, a complaint of sexual harassment to the Human Resource (HR) Department (through respective Lines of Service HR or through email [id:hr@apollo-micro.com](mailto:hr@apollo-micro.com) within a period of three (3) months from the date of incident and in case of more than one incident, within a period of three (3) months from the date of last incident. Complaints arising of incidents more than three (3) months old shall not be accepted.

(2) However, the ICC may, for reasons to be recorded in writing, extend such time limit of filing complaint up to further 3 months, if it is satisfied that bona fide circumstances prevented the aggrieved individual from filing complaint within the time limit mentioned in point (1) hereinabove. The complaint should clearly mention name and available details of both the aggrieved individual and the respondent. Anonymous or pseudonymous complaints will not be investigated.

(3) Where the aggrieved individual is unable to make the complaint on account of her/his physical or mental incapacity or death or otherwise, his/her representative, as more fully described under the Rules, may make a complaint.

(4) The HR Department will officially forward the complaint to the Presiding Officer of ICC within seven (7) days from the date of making of the complaint.

(5) The complainant shall submit six copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of sexual harassment(s) including names and address of witnesses, if any which the complainant believes to be true and accurate.

IX. REDRESSAL PROCESS FOR PROSECUTION OF ACTS OF SEXUAL HARASSMENT

The Company is committed to provide a supportive environment to resolve concerns of

sexual harassment as under:

A. CONCILIATION

1. When an incident of sexual harassment occurs, the aggrieved individual can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.
2. If the harassment does not stop or if aggrieved individual is not comfortable with addressing the harasser directly, the aggrieved individual can bring their concern to the attention of the Internal Complaints Committee for redressal of their grievances.
3. The Internal Complaints Committee will thereafter provide advice or extend support as requested and will undertake prompt investigation to resolve the matter.
4. Before the ICC initiates an inquiry, the complainant may request the ICC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the ICC shall record the same and forward the same to the Employer and provide copies of the settlement to the aggrieved individual and the respondent. In such cases, no further inquiry shall be conducted by the ICC.

B. INQUIRY:

1. In case where a settlement is not feasible or could not be arrived at through conciliation (ref clause "A" above), the ICC will conduct an inquiry into the complaint. Additionally an inquiry may also be initiated if the aggrieved person informs the ICC that any terms of settlement (ref clause "A" above) has not been complied with by the respondent.
2. The ICC within 7 (seven) working days of receiving the complaint shall forward one copy thereof to the respondent for obtaining a response.
3. The respondent within 10 (ten) working days of receiving the complaint shall file his/her reply to the complaint along with list of supporting documents, names and addresses of witnesses.
4. The ICC shall consider the reply from the respondent and initiate an inquiry. The complainant or the respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the ICC. ICC shall

hear both the complainant and the respondent on date(s) intimated to them in advance and the principles of natural justice will be followed accordingly.

5. In the event of failure to attend personal hearing before ICC by the complainant or the respondent on three consecutive dates (intimated in advance), the ICC shall terminate the inquiry proceedings or give an ex-parte decision. However, the ICC shall serve a notice in writing to the party (ies), 15 (fifteen) days in advance, before such termination or the ex-parte order.
6. In conducting the inquiry, a minimum of three Members of the Complaints Committee including the Presiding Officer shall be present.
7. The inquiry process shall be completed maximum within the period of 90 (ninety) days from the date of receipt of the complaint.
8. Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code (45 of 1860) or under any other law; it shall be the duty of ICC to immediately inform the complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and /or any action taken under this Policy.

C. INTERIM RELIEF

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

- Transfer the aggrieved individual or the respondent to any other workplace; or
- Grant leave to the aggrieved individual of maximum 3 months, in addition to the leave he/she would be otherwise entitled; or
- Grant such other relief to the aggrieved individual as may found to be appropriate; or
- Restrain the respondent from reporting on the work performance of the complainant.

Once the recommendation of interim relief is implemented, the Employer shall inform the committee regarding the same.

D. INQUIRY REPORT

1. The ICC within 10 (ten) days from the date of completion of inquiry shall provide a report of its findings to the Employer and such report shall also be forthwith made available to the complainant and respondent.
2. Where the Internal Committee arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the employer that no action is required to be taken in the matter.
3. where the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the employer, as the case may be, to take action in accordance with services rules applicable to the respondent or where no such service rules have been made in such manner as may be prescribed:
 - i. To deduct, notwithstanding anything in the service rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine or;
 - ii. To take action including a written formal apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, Transfer from present location, terminating/dismissal the respondent from service or undergoing a counseling session or carrying out community service.

E. APPEALS

Any person aggrieved by the report of ICC may prefer an appeal in accordance with the provisions of the Act to the Appellate Authority within 90 days from the date on which such report/findings is officially made available to the parties.

X. ACTION FOR FALSE OR MALICIOUS COMPLAINT OR FALSE EVIDENCE

The Company is committed to ensure that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue and/or produces any forged or misleading document or; the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or; any other person making the complaint has produced any forged or misleading document, will be subject to applicable disciplinary action.

XI. PROHIBITION ON DISCLOSURE OF INFORMATION

This policy and the law prohibits any person including ICC Members from publishing, communicating or making known to the public, press and media in any manner, contents of the complaint, the identity and addresses of the aggrieved person, respondent and witnesses, any information relating to conciliation and inquiry proceedings, or recommendations of the ICC during the proceedings under the provisions of the Act. Any violation thereto shall also be subject to disciplinary action. Further the Employer shall impose monetary penalty as per provisions of the Act and Rules.

XII. ACCESS TO REPORTS AND DOCUMENTS

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

XIII. AWARENESS:

1. All the Employees, Agents, Customers, Vendors, Partners and Visitors shall have access to this Policy at any given point of time and clarification related to this Policy shall be addressed by the HR team.
2. A brief shall be given to all existing employees regarding the features of this Policy immediately on formulation of the Policy and to new employees during their initial Induction.
3. The Company shall comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.

4. Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.

XIV. MISCELLANEOUS:

- a. Company may make any alteration or amendment or rescind any of the clauses of this Policy as and when it finds it necessary to do so as long as it complies with the Act. Any such alterations or amendment or rescinding will be intimated to the employees.
- b. The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.
- c. The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.
- d. Nothing contained in these rules shall operate in derogation of any law for the time being in force or to the prejudice of any right of any employee under any other Rules or Law.
- e. The Internal Complaint Committee shall prepare an annual report with the following details and shall submit the same to the Company to include in its Annual report:
 - a. Number of complaints of sexual harassment received during the year;
 - b. Number of complaints disposed off during the year;
 - c. Number of cases pending for more than 90 days;
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the employer.
- f. The Complaint Report and the MIS should be prepared by the Human Resources Department and shall be submitted before the end of a financial year to the Employer /Senior Management of the Company as per **Annexure A**.

XV. SAVINGS & REPEAL

Prevention of Sexual Harassment Policy at Work Place (15th July, 2019) hereby stands substituted with this Policy with effect from 25th October,2024. All existing inquiry proceedings and/or appeals initiated under the withdrawn policy will be deemed to have been made under this Policy and same shall continue accordingly.

XVI. CONCLUSION

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

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.

Disclaimer :-Complete care has been taken to incorporate all the relevant provision of the “Sexual Harassment of Women AT Workplace (Prevention, Prohibition & Redressal) ACT, 2013 into the policy “Prevention of Sexual Harassment at Workplace” (POSH) .However if at any time there is a discrepancy found between the Act & Policy, the provision of Act shall prevail.

ANNEXURE-A

1. Complaint Report:

Sr · No	File No	Name of Complainant	Date of Complaint Received	Complaint Against	Allegation s	Findings	Committee Members		Status	Actio n Take n	Complai nt Closure Date	Ageing
							Designation	Name				
1							Presiding Officer					
							Internal Member 1					
							Internal Member 2					
							Internal Member 3					
							External Member					
2							Presiding Officer					
							Internal Member 1					
							Internal Member 2					
							Internal Member 3					
							External Member					

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2. MIS

No. of Sexual Harassment Complaint Received	No. of Complaint Disposed off during Year	No. of Cases Pending for more than 90 days					No. of Workshop/Awareness Program conducted
			Warning Letter	Termination	Reported to Police Authorities	Any other	
Total-	Total-	Total-	Total-	Total-	Total-	Total-	Total-