

PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) POLICY

Objective

In continuation with our endeavour towards improved Gender diversity and Inclusion, and creating a safe, fair and just workplace, Tata Motors Global Services Limited (TMGSL) have put together the Prevention of Sexual Harassment at Workplace Policy.

We have formulated standard guidelines to address the issue of sexual harassment at the workplace, towards any woman associate. These would be administered by the Internal Committee (IC) in TMGSL.

Scope

All the women associates (permanent, temporary, contractual and trainees) as well as any woman visiting our office premises or woman service providers are covered under this policy of Tata Motors Global Services Limited (TMGSL). Any kind of objectionable conduct will be subject to disciplinary actions.

Employees at TMGSL are governed by the terms and conditions outlined in this policy.

Version	Release Date	Effective date	Summary of Changes
V0	October 1, 2025	October 1, 2025	Continued Terms & Conditions of old policy

This document supersedes any previous policy/ communication on this subject.

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PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY

The Company has continuously endeavoured to create a fair and just work place for its employees. This Prevention of Sexual Harassment (POSH) at Workplace Policy is in line with Tata Code of Conduct and within the legal framework to prevent and address Sexual Harassment at the work place.

The Company is committed to providing equal opportunity to all its employees without regard to their race, caste, gender, religion, colour, nationality, disability etc. All employees are treated with dignity with a view to maintain a work environment free of sexual harassment whether physical, verbal or psychological. Accordingly, the Company shall not condone at the work place any sexual harassment of a woman associate (includes permanent, temporary, trainees or contract employees) and shall enforce discipline in line with its applicable Service Policies/Standing orders.

Sexual Harassment

At any workplace in the Company, no woman, shall be subjected to sexual harassment which may include unwelcome sexually determined behaviour, physical contact, advances, sexually coloured remarks, showing pornography, sexual demands, request for sexual favours or any other unwelcome conduct of sexual nature whether verbal, textual, physical, graphic, or electronic or by any other actions under a promise of preferential treatment in employment or by threat about present or future employment status or a conduct which interferes with work or creates an intimidating or offensive or hostile work environment or humiliating conduct.

Prevention of Sexual Harassment at Work Place System

The company shall provide easily accessible redressal system to all the said women associates and whenever the management is made aware of such a case, the Company shall take prompt and effective action.

The Prevention of Sexual Harassment at Work Place (POSH) System set up will include Internal Committee (IC) based out of TMGSL, ICC Devi Gaurav Teck Park Pune. This will be responsible for disseminating this policy and taking effective steps for its propagation amongst employees and for fostering a free and fair reporting of all the issues.

Any woman associate or colleague may make a complaint with full details (a format is given in Annexure II) along with all relevant details. The complainant would be required to provide copies of all relevant evidence available to the IC to the extent possible. The IC will maintain complete privacy of everyone concerned with the complaint to the extent possible and shall ensure prompt action, and take immediate steps to safeguard safety and wellbeing of the complainant or the victim of the sexual harassment.

It shall be the responsibility of the IC to immediately investigate the complaint by examining all the witnesses concerned and checking the authenticity of the documentary evidence and taking such other measures to determine the true facts, record its finding and then to recommend the action to

be required to be taken by the Management through the Head of HR. TMGSL employees deputed at 3rd party locations/organisations or affiliated organizations/locations will be governed by respective organisation’s POSH policy with full support from the TMGSL POSH IC. The respective organization’s POSH IC may refer the matter to TMGSL POSH IC for various reasons, including but not limited to, the respondent being the TMGSL employee. In such a scenario, TMGSL POSH IC shall conduct the inquiry in accordance with this policy and the parties to such inquiry will be governed by this policy. The IC will be free to take such other measures as may be required to ensure that the learning’s from the incidents are assimilated and the repetitions of such incidents are avoided in future. The IC will arrive at their findings and recommendations after a detailed investigation.

In the event, it is found that the complaint is vexatious or false, the complainant would be liable to strict disciplinary action.

This policy is subject to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and will be implemented in line with the said Act and the rules / regulations made thereunder, as may be applicable from time to time.

The matrix given below mentions the key stakeholders for each step in the investigation, decision making and implementation process.

Level of Respondent/Accused	Investigation & Recommendation by	Decision By	Implementation by
Up to Level 3	IC	TMGSL Unit Head	TMGSL Unit Head / HR Head
Level 2 and above	IC	CFO	CHRO

Your Helpline

You may write to chandra.sen@tatamotors.com OR rpc860541@tatamotors.com and be assured of complete anonymity being maintained.

However, please note that for any sort of investigation to take place; your identity would have to be disclosed to the committee members. This would be done only after seeking your agreement on the same

For details of IC members, please refer Annexure “Prevention of Sexual Harassment (POSH) at Workplace Policy 4 - TMGSL POSH Internal Committee (IC) List” on mytatamotors > Policies.

Annexure 1

1. Format for registering/lodging of complaints: INCIDENT REGISTRATION FORM

FREQUENTLY ASKED QUESTIONS

Prevention of Sexual Harassment At Work Place Policy ("POSH")

This policy is subject to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and will be implemented in line with the said Act and the rules / regulations made thereunder, as may be applicable from time to time. We have attempted to answer some of the issues raised by employees but all issues of sexual harassment will be dealt with in accordance with the above mentioned Act and the rules /regulations framed thereunder. In the event there is any discrepancy or confusion, action will be taken strictly in accordance with the law as may be applicable.

1. What is sexual harassment?

Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely –

- Physical contact and advances; or
- A demand or request for sexual favors; or
- Making sexually colored remarks; or
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

2. Who is an aggrieved person?

The employee who has faced sexual harassment in any of the above form is the aggrieved person.

3. Who is the respondent?

The person against whom the complaint has been filed is the respondent.

4. Who Can Be a Target of Sexual Harassment?

Sexual harassment can occur in a variety of circumstances, including but not limited to the following:

- a) Sexual harassment can occur between peers or between individuals with different degrees of power and status.
- b) The harasser can be the victim's supervisor, an agent of the employer, a supervisor in another area, a co-worker, or a non-employee in the work place.
- c) The victim does not have to be the person harassed but could be anyone reasonably affected by the offensive conduct

5. If there is any sort of harassment of a male employee, where can he raise the same?

In case of any form of sexual harassment of a male employee, the same can be reported to the respective location HR SPOC or unit head and appropriate action will be taken regarding the issue raised.

6. Is it sexual harassment if the harassment is only verbal?

Verbal harassment can be sexual harassment. Words can be just as offensive as physical acts and contact. Jokes and stories can be sexually harassing and creates a hostile work environment.

7. What are the Types of Sexual Harassment?

- a) Verbal Harassment

- b) Physical Harassment (also liable under the Indian Penal Code)
- c) Written or Graphic harassment
- d) Emotional Harassment
- e) Third Party Harassment

8. What comes under the purview of verbal Sexual Harassment?

- a) A demand or request for sexual favours.
- b) Comments about a person's sex or private life
- c) Sexually coloured remarks.

9. What comes under the purview of Physical Sexual Harassment?

- a) Offensive gestures.
- b) Touching in a sexual manner.
- c) Assault or coerced sexual acts.

10. What comes under the purview of Written or Graphic Sexual Harassment?

- a) Unsolicited forwarding of pornographic pictures through email or any other media
- b) The display of sexually suggestive objects, pictures, magazines, posters or cartoons in the work-area.
- c) Written communication that has sexual implications.

11. What comes under the purview of Third Party Sexual Harassment?

Any kind of sexual harassment made by an employee of the Company out of/in course of employment against any woman associate against the Sexual Harassment policy will be considered a breach and violation Tata Code of Conduct.

Any person visiting the Company premises or working on and behalf of any organization providing or offering goods or services to the company will also be governed by the policy.

INTERNAL COMMITTEE

12. Are anonymous complaints accepted?

The company will take all the steps to preserve the identity of the complainant. In the event, if the complainant does not reveal her identity even to the company, the company would investigate and take steps as may be possible. However, in the absence of evidence, the committee may find it difficult to establish the harassment.

13. How to initiate an inquiry in case of sexual harassment?

To initiate an inquiry

- At the time of filing the complaint, the complainant has to submit 6 copies to the IC along with supporting documents and the names and addresses of the witnesses
- On receipt of the complaint, the committee will send 1 copy to the respondent within 7 working days
- The respondent has to file his reply along with supporting documents and names and addresses of the witnesses within a period not exceeding 10 working days from the date of receipt of the complaint copy

14. Can the IC give a decision if any of the involved parties are not present for the hearings?

IC has the right to continue the inquiry proceedings and take a decision on the complaint on the basis of the material/evidences available with them, if either of the parties fail (without sufficient cause) to present herself/himself for 3 consecutive hearings. However, this can be done only after sending a notice in writing, 15 days in advance, to the parties concerned.

15. Can the involved parties bring an external legal practitioner for the proceedings?

No, the involved parties cannot bring an external legal practitioner for the proceedings.

16. How many members of IC should be present for conducting an inquiry?

A min. of 3 members including the Chairperson should be present to conduct the inquiry.

17. What are the offences covered and the procedure to be followed under the Indian Penal Code?

In case of complaints of offences under the Indian Penal Code, the Committee should advise the complainant to file a complaint with the police immediately. A complaint may also be filed simultaneously with the IC. The Committee should leave the option with the complainant whether the complaint should be filed with the police, but the support of the company in filing the complaint could be provided.

PUNISHMENT AND REMEDIAL ACTION

18. What is the Action to be taken during pendency of inquiry?

The management would take all possible steps to make the complainant feel comfortable.

During the pendency of enquiry, on a written request made by the aggrieved woman, the Local IC, as the case maybe, may recommend to the employer to

- a) Transfer respondent to any other workplace, or
- b) Grant leave of absence to the respondent
- c) Transfer the aggrieved woman to any other workplace, or
- d) Grant leave to the aggrieved woman, or
- e) Grant to the aggrieved woman any other relief which may be prescribed.

Provided that no woman shall be transferred except on her own request. The leave granted to her under this section will be in addition to the leave she would be entitled to otherwise if the case is proved.

19. What actions can be taken against the respondent in case he is found guilty?

IC can recommend to the employer to take an action including

- Written apology
- Warning
- Reprimand or censure
- Withholding of promotion
- Withholding of any pay rise or increments
- Termination
- Undergoing counseling sessions
- Carrying out community service
- Or any other appropriate action

20. What action would the Company take in case of a false/malicious complaint?

In the event, it is found that complaint is vexatious or false, the complainant would be liable to strict disciplinary action.

21. What is the remedial action taken by the company?

Counselling shall be arranged for the complainant, if the charge is found valid. The company will try to ensure that the complainant, if the charge is found valid, or the alleged harasser, if found innocent, are protected against any impacts of retaliation.

22. What is the scope of Accountability in the Process?

HR would be the primary process owner. The Committee would recommend the suitable action to be taken to the concerned HR Head as applicable. The Unit Head shall implement the action identified.

ANNEXURE 1

INCIDENT REGISTRATION FORM

Date:		Location:	
Name of Complainant: (name of the victim also if complaint made by a representative)		Personnel Number of the Victim (if TMGSL employee):	
Complaint Against (Name): Specify if more than one person was involved.		Personnel Number of the person against whom complaint is made (if TMGSL employee):	
Is the respondent the Reporting Manager/ Reviewer:			

Details of Incident: *(Please include details like when, where, and also try to capture what was said or written or done which was offensive, disturbing or uncomfortable and how)*

*Details:

1. What was the incident? – Where, How, When?
2. Witness – If yes, how many? Their names, Have they witnessed the entire act? If no, which part of the act have they witnessed?
3. Was the incident discussed with anyone? Details.
4. Please attach material of evidence you have to substantiate/prove whatever is mentioned in the complaint
(Please attach extra sheets if required)

Details of Enclosures: *(If you are attaching any evidence, please mention below)*

Phone messages/ Photographs/ Hand- written or typed letter/ recorded conversations produced by the Complainant, a printed and signed copy of any statement made by either party along with specific mention of date, time and location.

For use of Internal Committee (IC)

The above incidence report has been received on _____.

_____ (Signature)

Name of the Committee Member:
Internal Committee (IC), _____ (Location)
Case No.: _____