



Policy on Prevention and Redressal of Harassment at Workplace

GMM Pfaudler Limited ("Company") is committed to maintaining a work environment free of unlawful harassment and discrimination. The Company has a zero-tolerance policy towards any form of harassment or discrimination at the workplace. This policy prohibits harassment based on, but not limited to, the following: sex; gender; pregnancy, childbirth, or related medical conditions; race; religious creed; color; national origin or ancestry; physical or mental disability; medical condition; marital status; age; sexual orientation; or any other characteristic protected by applicable federal, state, or local laws or regulations. Any such harassment is unlawful and will not be tolerated.

This policy applies to all individuals involved in the operations of the Company, including employees, whether permanent, temporary or contractual, and supervisors, vendors, applicants, candidates, customers, contractors, suppliers, clients or visitors. It strictly prohibits harassment directed from or towards any employee, whether permanent, temporary or contractual, and supervisor, vendor, or applicants, candidates, customers, contractors, suppliers, clients or visitors.

Reporting Harassment

If you believe that you have been unlawfully harassed, you are encouraged to submit a written complaint. It is important to report all facts and details of the incident promptly to ensure the matter is investigated and addressed appropriately.

Harassment Complaints

Individuals of any sex can submit complaints regarding any form of harassment at the workplace.

Where the complaint is from a person identifying as a woman AND alleges harassment that prima facie identifies as sexual harassment at the workplace, the same shall be dealt under the Anti-Sexual Harassment Policy of the Company by the Internal Committee constituted under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

All other complaints, i.e., complaints against harassment that prima facie does not identify as sexual harassment at the workplace, or where the person impacted does not identify as a woman, will be investigated and addressed by the Grievance Redressal Committee of the Company, under this Harassment Policy of the Company.

When determining whether an incident is prima facie harassment or sexual harassment under this **Policy on Prevention and Redressal of Harassment at Workplace** or the **Anti-Sexual Harassment Policy** respectively, the perspective of the person impacted will prevail. This approach acknowledges that the impact of behavior on the recipient, rather than the intent of the individual responsible, is the critical factor in evaluating harassment. The subjective experience of the impacted person, combined with the reasonableness of their perception under the circumstances, will guide the assessment process. This ensures that any unwelcome, offensive, or harmful conduct—whether general harassment or sexual in nature—is addressed appropriately, fostering a safer and more inclusive workplace.



Whistleblower Policy

If you become aware of harassment against a third party or receive information in good faith, you are obligated to report the matter to your supervisor or the HR Manager. Complaints can also be raised as per the Company's Whistleblower Policy and will be subject to relevant laws.

Actions and Consequences

If the Company determines that unlawful harassment has occurred, remedial action will be taken promptly by the Grievance Redressal Committee in accordance with the Company policy and applicable laws. Employees found responsible for unlawful harassment will be subject to appropriate disciplinary action, up to and including termination of employment.

The Company strictly prohibits any form of retaliation against employees for filing complaints or participating in investigations. Retaliation by managers, employees, or co-workers will not be tolerated.

Queries and Assistance

If you have questions regarding what constitutes harassment or discrimination or have concerns about this policy, please contact HR for guidance.

All employees are expected to familiarize themselves with this policy and adhere to its provisions.

Document Control

All changes to the process document can be made only by the Document Owner.

Document Owner	Board of Directors of GMM Pfaudler Ltd.
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