

A light blue tower structure with a triangular top and a base, resembling a transmission tower. Two red lightning bolts are positioned on either side of the tower, one pointing towards the top right and the other towards the top left.

**PREVENTION OF  
SEXUAL  
HARASSMENT  
POLICY**

**AP TRANSCO  
ISO 27001 - 2022**

**TRANSMISSION CORPORATION OF ANDHRA PRADESH LIMITED**

**(“AP TRANSCO”)**

**CIN: U31909AP1998SGC107226**

**Prevention of Sexual Harassment (“POSH”) Policy**

Version 2.0

Effective Date	-	2014
Last Review Date	-	2014
Reviewed by	-	Company Secretary
Approved by	-	Board of Directors

## **POLICY STATEMENT**

1. Transmission Corporation of Andhra Pradesh Limited (hereinafter referred to as “AP TRANSCO” or “Company”) is committed to provide a safe, non-discriminatory, non-hostile and harassment free work environment that is free from any form of intimidation or harassment that is sexual in nature and to maintain a Workplace where all the Employees are considered equal and where the dignity of each Employee is respected and protected.
2. AP TRANSCO will operate a zero-tolerance policy for any form of Sexual Harassment in the Workplace.
3. All complaints of Sexual Harassment will be taken seriously and treated with respect and in confidence.
4. This Policy takes complete cognizance of the “Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013” of India (hereinafter referred to as the “PoSH Act”) and the rules framed thereunder. This Act is to provide protection against Sexual Harassment of women at the Workplace for the prevention and redressal of complaints of Sexual Harassment and for the matters connected therewith or incidental thereto.

**SCOPE:**

1. This Policy shall cover the process to investigate and redress complaints of Sexual Harassment at the Workplace.
2. While the PoSH Act's applicability is limited to women Employees, this Policy is gender-neutral extending the benefits of the provisions to all Employees, irrespective of their gender. Therefore, any Employee, regardless of gender, can file a complaint of Sexual Harassment under this Policy in the context of the Workplace.

In case of conflict between the terms under this Policy and the PoSH Act, the terms under PoSH Act shall prevail over the terms under this Policy.

This Policy does not cover:

- a) Interactions or engagements in personal capacity, even if they started in the Workplace.
- b) Any complaints that do not fall under the definition of Sexual Harassment.

**APPLICABILITY:**

This Policy shall be applicable to -

- i. Employees, whether full-time, part-time, temporary, ad-hoc or daily wage basis, either directly or through an agent and includes contractual personnel, probationers, trainees, apprentices and interns.
- ii. Customers, vendors and their Employees, consultants, and anyone else doing business at the organization's Workplace or interactions arising from any work being carried out by or on behalf of the organization.
- iii. Anyone who is present in the Workplace such as candidates, visitors, guests, etc.

**DEFINITIONS:**

**"Aggrieved Person"** is a person, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent;

**"Complainant"** is either the Aggrieved Person or a person authorized by the Aggrieved Person who is raising the complaint;

**"Employee"** means a person employed at the Workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, 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 express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

**"Employer"** means a person responsible for the management, supervision and control of the Workplace;

**"Respondent"** is a person against whom the Complainant has made the complaint;

**“Sexual Harassment”** may occur not only when a person uses sexual behavior to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an Employee and someone that the Employee deals with in the course of their work who is not employed by the organization;

Sexual Harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication), but is not limited to:

1. Any unwelcome sexually determined behaviour, or pattern of conduct, that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed namely:
  - a) unwelcome sexual advances involving verbal, non-verbal, or physical conduct, implicit or explicit;
  - b) physical contact and advances including (but not limited to) touching, stalking, sounds that have explicit and /or implicit sexual connotation/overtones, molestation;
  - c) teasing, voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement and /or touching against one’s will or an act likely to intrude upon one’s privacy;
  - d) demand or request for sexual favours;
  - e) sexually coloured remarks or remarks of a sexual nature about a person’s clothing or body;
  - f) display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work-related areas;
  - g) showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.;
  - h) repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person’s wishes;
  - i) giving gifts or leaving objects that are sexually suggestive;
  - j) persistent watching, following, and contacting of person;
  - k) any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.
2. The following circumstances if it occurs or is present in relation to any sexually determined act or behaviour amount to Sexual Harassment:
  - a) implied or explicit promise of preferential treatment in employment;
  - b) implied or explicit threat of detrimental treatment in employment;
  - c) implied or explicit threat about the present or future employment status;
  - d) interference with the person’s work or creating an intimidating or offensive or hostile work environment;
  - e) humiliating treatment likely to affect health or safety.

An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the Respondent but on the experience of the Aggrieved Person.

Sexual Harassment also include instances which have been laid down by applicable law either by way of enactment or by other means such as judgements or can be perceived as Sexual Harassment within the framework of law, or to further the objective of the law.

“**Workplace**” includes any premises, locations, establishments, enterprises, institutions, offices, branches, sub stations or units established which are owned or controlled by the Company, whether physical, virtual, or otherwise, where an Employee carries out work-related activities or duties for and on behalf of the Company and which encompasses not only the primary Workplace but also any off-site or remote location where work is performed, official events, work-related travel, or any other setup where work-related interactions occur;

“**Organization**” means Company i.e., APTRANSCO.

#### **A. INTERNAL COMMITTEE / COMPLAINTS COMMITTEE / POSH COMMITTEE:**

An Internal Committee / Complaints Committee / POSH Committee (“Committee”) means a committee constituted to address any issue relating to the prevention, prohibition and redressal of Sexual Harassment at Workplace. The details of the committee is notified to all covered persons at the location (Workplace). The Committee at each location shall comprise of minimum four Members with at least half of the Members being women.

The Committee at each location comprises of:

Presiding Officer: A woman employed at a senior level in the organization or Workplace,

At least two Members from amongst Employees, committed to the cause of women or have legal knowledge or experience in social work,

One external 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.

The Committee shall be responsible for:

- i. Receiving complaints of Sexual Harassment at the Workplace.
- ii. Initiating and conducting inquiry as per the established procedure.
- iii. Submitting findings and recommendations of inquiries.
- iv. Coordinating with the Employer in implementing appropriate action.
- v. Maintaining strict confidentiality throughout the process as per established guidelines.
- vi. Submitting annual reports in the prescribed format.

#### **B. COMPLAINT FILING MECHANISM:**

In case of any issues of Sexual Harassment, whether existing or perceived, either explicit or implied, the Complainant is required to report the matter within a period of 3 months from the date of the incident and in case of more than one incident, within a period of 3 months from the date of the last incident, to any of the following in the prescribed manner without any order of preference –

- 1) Write to the Chairperson of the Committee by email to [jyostnarani.p@aptransco.gov.in](mailto:jyostnarani.p@aptransco.gov.in).
- 2) Write to any Member of the Internal Committee by email or text message (*contact details attached at the end of this policy*).

3) Submit a written complaint to the Chairperson or to any Member of the Committee by meeting in person.

4) Drop a written complaint in the Complaint box available in the premises of the Company.

Irrespective of the channel of communication, all reported matters shall be duly forwarded to the Committee, within seven days, for further action in the matter.

While there is no prescribed format for raising a complaint, it is recommended that the Complainant shall make the complaint, along with necessary facts, documentary evidences and details of witnesses, as available for a thorough and unbiased inquiry into the matter.

#### **C. NON-RETALIATION:**

The Company shall not support or tolerate retaliation or victimization in any form against anybody who identifies or raises concerns, lodges complaints and /or participates in the related proceedings. Any such person who engages in such retaliation or victimization whether directly or indirectly, or encourages others to do so, shall be subject to appropriate disciplinary action.

#### **D. REDRESSAL PROCESS:**

##### **a. Conciliation:**

While an Aggrieved Person has a right to raise a Sexual Harassment issue and get the matter investigated till its resolution, if for any reason, the Aggrieved Person decides to withdraw the complaint/requests for settlement, the same shall be considered in accordance with the provisions of the law and dealt with as follows:

- i. The Committee may before initiating the investigation and at the request of the Aggrieved Person take steps to settle the matter between such Aggrieved Person and the Respondent through conciliation;
- ii. No monetary settlement shall be made as a basis of conciliation;
- iii. Where a settlement has been arrived at, the Committee shall record the settlement so arrived and forward the same along with recommended action to the organization. No further investigation shall be conducted;
- iv. The Committee shall provide copies of the settlement as recorded by the Committee to the Aggrieved Person and the Respondent.

##### **b. Investigation:**

- i. Subject to the above clause D.a and in the event of any term or condition of the settlement not being complied with by the Respondent, issues raised under this policy shall be referred for investigation at the instance of the Committee as per the protocol.
- ii. The Committee shall follow the principles of natural justice by adhering to the following steps in particular with regard to inquiry into the complaint:
  - a. At least three Members of the Committee (including the Presiding Officer) shall preside over the inquiry.

- b. On receipt of the complaint, the Committee shall send a copy of the complaint to the Respondent within 7 working days, indicating the deadline by which a response, along with evidences and details of witnesses should be submitted.
  - c. The Respondent shall also be given an opportunity to be heard and make written submissions on the allegations made and circumstances leading to the complaint.
  - d. In case of failure on the part of the Respondent to respond to the complaint or make themselves available for the hearing, the Committee at its discretion may terminate the inquiry in favor of the Aggrieved Person, after giving fifteen days' notice to the parties concerned.
  - e. The parties shall not engage a lawyer to represent their case in proceedings before the Committee.
  - f. At the request of the Complainant and upon the recommendation of the Committee, the location of inquiry and inclusion of additional witnesses in the investigation may be considered.
- iii. In the event, the victim chooses to take recourse to law, the organization may at its sole discretion decide to not pursue the matter further.
  - iv. Inquiry shall be completed within a period of 90 days from the date of receipt of the complaint.
  - v. During the pendency of an inquiry, on a written request made by the Aggrieved Person, the Committee, may recommend to the Employer to–
    - a. transfer the Respondent / Aggrieved Person to any other Workplace;
    - b. grant paid leave to the Aggrieved Person of a maximum of three months, in addition to the leave Aggrieved Person would be otherwise entitled to;
    - c. grant such other reasonable relief to the Aggrieved Person as may be directed by the Committee.

**c. Inquiry Report:**

The Committee will submit the inquiry report to management within a period of 10 days from the date of completion of the inquiry in consideration of the following –

- Nature of evidence in support of the allegation;
- Leading circumstances culminating in Sexual Harassment;
- Discrepancies, if any, in the allegations and the submission made by the victim and his/ her witnesses;
- Grounds for review or counter allegations/ evidences from the Respondent.

The Employer shall act upon the recommendations of the Committee within 60 days of receipt of the final investigation report.

**d. Appeals:**

Any party not satisfied or further aggrieved by the implementation or non-implementation of recommendations made, may appeal to the Appellate Authority i.e., Court in accordance with the Act, within 90 days of the recommendations being communicated.

**E. RECORD KEEPING SYSTEM:**

Establishing a robust record-keeping system is essential for documenting complaints, inquiry, and outcomes related to Sexual Harassment cases. The organization shall ensure the following:

**Comprehensive documentation:** All complaints received, inquiry conducted, and outcomes determined are meticulously documented. This includes recording dates, details of the parties involved, evidence gathered, and the decisions made.

**Confidentiality:** The system shall prioritize the confidentiality of all individuals involved. Access to records shall be restricted to authorized personnel only, and measures shall be taken to protect sensitive information from unauthorized disclosure.

**Compliance and retention:** Record-keeping practices shall comply with relevant laws and regulations. Records shall be retained for the duration required by law and policy, and will be disposed of securely once they are no longer needed.

**Transparency and accountability:** The system shall facilitate transparency in the process while maintaining confidentiality. It shall also support accountability by providing a clear trail of actions taken in response to each complaint.

**F. EXTERNAL RESOURCES FOR ADDITIONAL SUPPORT:**

The Company recognizes that Employees who experience or witness Sexual Harassment may require additional support beyond the internal processes. To ensure that all Employees have access to the necessary resources, the following external support services are available:

**Legal Assistance:** Employees who need legal advice or assistance related to Sexual claims can access free or low-cost legal aid services. The Company provides information on reputable legal aid Organizations that specialize in Workplace harassment and Employee rights.

**Confidentiality and Anonymity:** All external resources provided are intended to be used confidentially. The Company respects the privacy of Employees seeking external support and ensures that information about accessing these services by Employees will not be further disclosed by the organization.

**G. CONSEQUENCES OF VIOLATIONS OF POLICY:**

APTRANSCO is committed to maintaining a Workplace that is free from Sexual Harassment. Any violation of this policy will be treated with the utmost seriousness and may result in significant consequences. The following outlines potential consequences for violations of the Sexual Harassment policy:

- a) **Disciplinary Action:** Depending on the severity and frequency of the violation, the individual may receive a formal warning or demotion which the Committee deems fit.

**b) Legal Consequences:** The Company reserves the right to report the violation to relevant authorities if it constitutes a criminal offense. The individual may face civil or criminal charges, depending on the nature of the violation.

#### **H. MALICIOUS ALLEGATIONS:**

Where the Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, it may recommend to the organization to act against the Complainant. While deciding malicious intent, the Committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry. In case a witness has given false evidence or produced any forged or misleading document during the inquiry, the Committee may recommend to the organization to act against the witness.

#### **I. AWARENESS:**

Awareness sessions shall be organized to carry out orientation programs and seminars for the Members of the Committee and to conduct workshops and awareness programs for sensitizing the Employees to the provisions of the PoSH Act.

#### **J. CONFIDENTIALITY:**

Where the Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, it may recommend to the organization to act against the Complainant. While deciding malicious intent, the Committee should consider that mere inability to substantiate a complaint need not mean malicious intent. Malicious intent must be clearly established through a separate inquiry.

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**I) State level committee members:**

1.	Smt P. Jyostna Rani, DGM,O/o CGM (Comml &Coord.,)	-	Chairperson	7382296925
2.	Smt K. Suvarchala Devi, DGM, O/o FA&CCA(Accounts)	-	Member	7382943989
3.	Smt B. Aruna, PO, O/o Additional Secretary	-	Member	9491039931
4.	Smt P.Anusha, DEE, O/o APSLDC,V.S, Vijayawada	-	Member	81430 32904
5.	Sri G. Sivaiah, GM, O/o CGM (PP & Legal)	-	Member	9849396524
6.	Smt G.Rashmi, Secretary, Vasavya Mahila Mandali	-	Member	98490 81733

**II) Zonal Level Sub committee members:**

<b>Visakhapatnam Zone Sub-Committee Members</b>				
1.	K. Mahalakshmi, AS, Zonal Office/VSP	-	Chairperson	9010021172 9182918390
2.	A. Anuradha, DEE, Common point	-	Member	9490155156
3.	P.Indira rani, AO, Zonal Office/VSP	-	Member	8179836245
4.	GVCH Balaji, SE, 400KV OMC/VSP	-	Member	9553438881
<b>Vijayawada Zone Sub-Committee Members</b>				
1.	V. Sasikala, SAO, Zonal Office/VJA	-	Chairperson	9885756249
2.	K. Sree Vasavi, EE, SE/O&M/VJA	-	Member	9052776895
3.	Ch. Sangamitra Ambedkar, DEE, Zonal office/VJA	-	Member	9866802281
4.	K.V .Ramakrishna, SE, SE/400 KV/VJA	-	Member	9182487865
<b>Kadapa Zone Sub-Committee Members</b>				
1.	Smt Marella Jagadeewari, A.O, Telecom Circle	-	Chairperson	6300438029
2.	Smt Anga Salomy Vinaya kumari, DEE, S/220 KV SS/C.K.Palli	-	Member	9000536700
3.	Smt Dachuri Gowthami, AEE, Technical/O&M Circle	-	Member	9490154206
4.	Sri Shaik Fazululla Basha, PO, Zonal Office/KDP	-	Member	8247550602