



Prevention of Sexual Harassment of Women at Workplace

Adani Airport Holdings Limited (AAHL)

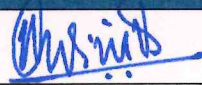
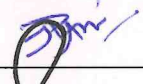


*The AAHL Prevention of Sexual Harassment of Women at Workplace Policy is in alignment with the Group's Guideline on Prevention of Sexual Harassment of Women at Workplace Policy

Human Resources	 Prevention of Sexual Harassment of Women at Workplace	Doc No: HR/PLCY/09
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Human Resources	 Prevention of Sexual Harassment of Women at Workplace	Doc No: HR/PLCY/09
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1. Background, Purpose & Objective:

- 1.1. Adani Group is an equal opportunity employer and treats all Employees and candidates equally and is committed to creating a healthy working environment free from discrimination on any ground and from harassment at work including Sexual Harassment. Thus, ensuring and enabling all Employees to work without fear of prejudice, gender bias and Sexual Harassment.
- 1.2. Sexual Harassment infringes the fundamental right of a person under Article 14 and 15 of the Constitution of India. Further, Article 21 of the Constitution of India guarantees right to life and to live life with dignity which includes right to a safe environment free from Sexual Harassment. The **right to protection from Sexual Harassment** and **right to work with dignity** are recognized as universal human rights by International Conventions. The Supreme Court of India had also laid down fundamental guidelines to address the issue of Sexual Harassment.
- 1.3. Adani Airports will not tolerate any form of Sexual Harassment, directly or indirectly, and is committed to take all necessary steps to ensure a Workplace free from any form of Sexual Harassment.

Sexual harassment at the Workplace, or other than workplace, if involving employees, is a grave and punishable offence. The Adani operates a zero-tolerance policy for any form of Sexual Harassment, deals with all incidents seriously and promptly investigates all allegations of Sexual Harassment. Any person found to have sexually harassed another shall face disciplinary action, up to and including dismissal from employment.

- 1.4. The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 (hereinafter referred to as "POSH Act") enjoins upon employers to lay down guidelines / policies for protection against sexual harassment of women at workplace, directly or indirectly, and for the prevention and redressal of complaints of sexual harassment and for matters connected with or incidental there to.
- 1.5. Adani guidelines provide a platform for centralization of information / data on existing as well as formation of new Internal Complaint Committees as well as to oversee compliance with statutory requirements with respect to The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. To address any complaints of Sexual Harassment and ensure implementation of this Policy across all the locations of Adani Group, the following Committees are constituted:

Human Resources	 Prevention of Sexual Harassment of Women at Workplace	Doc No: HR/PLCY/09
		Revision No: Original Version
		Issue Date: 01-04-2024

- i. Group Monitoring Committee a centralized redressal committee at Group level.
- ii. Internal Complaints Committee, ('ICC') for each Assets/location.

2. Scope & Coverage

The Policy is applicable to:

- 2.1. All employees/consultants/advisors/retainers of Adani Airports Including its subsidiaries, associates and affiliate companies.
- 2.2. All suppliers and clients of Adani Airports & its subsidiaries including their agents
- 2.3. All **Third parties**, including their agents associated with Adani Airports & its subsidiaries during all activities conducted at workplace or all work-related activities elsewhere.

Where Sexual Harassment occurs as a result of an act of commission or omission by any Third Party at their Workplace, Adani Airports shall take all steps necessary and reasonable to assist the affected person/victim.

This policy is deemed to be incorporated in the service conditions of all employees and comes into effect immediately.

3. Definitions

- 3.1. **"Aggrieved Person"** means in relation to a Workplace, any woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent
- 3.2. **"Committee(s)"** means committee(s) formed by Adani Airports for redressal of complaints of Sexual Harassment in accordance with the procedure laid down in this Policy
- 3.3. **"Complaint"** means and includes:
 - i. any complaint (written or oral form) in the nature of Sexual Harassment made by an Aggrieved Person against any other Employee within Adani Group or any Third-Party having business dealings with Adani Group.
 - ii. Complaint by any other person not covered herein, can be considered only if made as per the procedure prescribed herein and as per the discretion of Committee.

Human Resources	 Prevention of Sexual Harassment of Women at Workplace	Doc No: HR/PLCY/09
		Revision No: Original Version
		Issue Date: 01-04-2024

3.4. **"Employer"** means:

- i. in relation to any department, organization, undertaking, establishment, enterprise, institution, office, branch or unit, the head of that department, organization, undertaking, establishment, enterprise, institution, office, branch or unit;
- ii. in any workplace not covered under (1) above, any person responsible for the management, supervision or control of the workplace

For the purposes of this definition "management" includes the person or board or committee (including Group Committee) responsible for formulation and administration of policies related to prevention of sexual harassment at workplace.

3.5. **"Employee"** would mean and include the following:

- i. "Employee" used herein is to be strictly interpreted in terms of and provisions of the POSH Act.
- ii. For the purpose of this policy "Employee" means a person employed at a 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, deputation, trainee, apprentice or called by any other such name.
- iii. This broad definition of "Employee" used for the purpose of this policy cannot be used to claim the rights of an employee conferred by any other law of the land for the time being in force.

3.6. **"Respondent"** means a person against whom the Aggrieved Person has made a Complaint.

3.7. **"Sexual Harassment"** would mean and include, directly or indirectly, any of the following:

- i. Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- ii. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually colored remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, including touching an employee's clothing, hair or body and/or touching or rubbing oneself sexually around another person or molestation, stalking, sounds including kissing sounds or smacking lips, display of pictures, signs including whistling, verbal or non-verbal communication which offends the individual's sensibilities and affects her/his performance:

Human Resources		Doc No: HR/PLCY/09
	Prevention of Sexual Harassment of Women at Workplace	Revision No: Original Version
		Issue Date: 01-04-2024

- iii. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy.
- iv. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating for women employee and includes implied or explicit threat about her present or future employment status as well as humiliating treatment likely to affect her health or safety.
- v. Any other unwelcome gesture by an employee having sexual overtones.

3.8. **"Third Party"** includes any person not on the rolls of Adani Group but interacts with the employees such as consultants, retainers, customers, vendors, suppliers, contract workers, trainees or any outside visitor within or outside Adani Group.

"Workplace" would mean and include the following:

- i. Any premises, locations, establishments, enterprises, institutions, offices, branches, or units established, owned, controlled by Adani Group
- ii. Any external location visited by the Employee arising out of or during the course of employment including any mode of transportation provided by the Employer or use of public transport such as uber/ola etc for undertaking a journey to and from the aforementioned locations.

4. Scope of Group Monitoring Committee

A Committee at group level is formed to:

- i. To provide a healthy and safe working environment at the Workplace which shall include safety from the persons coming into contact at the Workplace and further clearly display at all conspicuous places in the Workplace the penal consequences of Sexual Harassment. Further, assist in designing required interventions for awareness and propagation of this policy at regular intervals for sensitizing the Employees with the procedure and provisions of the Policy and Act
- ii. Oversight and ensure the rightful implementation of the Policy at all locations / branches/ offices of all the verticals of the Adani Group. Further, provide the required guidance / advice for continual compliance from time to time and necessary facilities to the Internal Complaints Committee (ICC) for dealing with the Complaint and conducting an inquiry:
- iii. Monitor and review functions of Internal Complaints Committee (ICC) such as ensure the Complaints received have been redressed as per the policy without any deviation and further the Complaints which have been escalated are addressed promptly. Furthermore, provide an avenue for Aggrieved Person to register / escalate their Complaints in case the same is not attended to by local ICC In appropriate time.
- iv. If it deems necessary may, suo moto, review an investigation / inquiry proceeding conducted by the Internal Complaints Committee (ICC) against Sexual Harassment

Human Resources		Doc No: HR/PLCY/09
	Prevention of Sexual Harassment of Women at Workplace	Revision No: Original Version
		Issue Date: 01-04-2024

and take any action as it may deem fit to protect and safeguard the interest and fairness of the redressal process.

5. Redressal And Enquiry Process

- i. The Committee shall be governed by provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013 and any rules/amendments thereof, including Supreme Court Guidelines on the subject. Further it is to be noted that the entire Complaint procedure of redressal and enquiry has been already detailed and adopted by Internal Complaint Committees (ICC) for each assets/location accordingly. [A copy of the entire Complaint procedure of redressal and enquiry detailed and adopted by Internal Complaint Committees (ICC) for each asset/location is marked and annexed as Annexure 1]
- ii. A copy of the Complaint with all the annexures, the full inquiry report of the Complaint, post completion of investigation process along with its recommendations shall be made available by the Internal Complaints Committee (ICC) to the Group Committee, wherever applicable, within 10 days of completion of inquiry/investigation.
- iii. Group Committee shall provide any other assistance, guidance and supervision, from time to time, as and when required to each Internal Complaints Committee (ICC) for a prompt and smooth redressal and enquiry procedure to be conducted in the most fair and just manner within the time frame and policy of the Adani Group.
- iv. The Internal Complaints Committees (ICC) shall submit its final report on the investigation with a recommendation for further action on the Complaint. The Group Committee upon receipt of such a report shall communicate to Internal Complaint Committees (ICC) within 7 days its views to take final action against the Complaint.
- v. The Group Committee may take up along with Internal Complaint Committees (ICC), at its discretion, any other Complaint(s) which are grave and serious in nature requiring its immediate and direct involvement.

6. Disciplinary Action for Sexual Harassment

The Committee shall recommend disciplinary action against respondents, if found guilty, post completion of the investigation proceedings. The nature and severity of the disciplinary action will be commensurate with the severity and persistence of misconduct. The disciplinary action includes but is not restricted to the following:

- i. Mandatory Written Apology accepting such action not to repeated in future towards any person.
- ii. Mandatory training or counselling session.
- iii. Letter of Warning that shall be marked in the employee's employment record with the company.
- iv. Immediate transfer to a different department, location or both for either the aggrieved woman or the person against whom the complaint is made/accused/respondent.

Human Resources	 Prevention of Sexual Harassment of Women at Workplace	Doc No: HR/PLCY/09
		Revision No: Original Version
		Issue Date: 01-04-2024

- v. Withholding of promotion, increment, gratuity, incentives, bonus or all.
- vi. Demotion from the respondent employee's present grade.
- vii. Dismissal from service of the company.
- viii. Any other action that the committee deems reasonable.

7. Protection Against False Accusations

- ix. False or malicious accusations of Sexual Harassment can have serious or disturbing effect on innocent Employees.
- x. All Complaints made of Sexual Harassment should be factual and true. If after investigation it becomes clear that the Aggrieved Person or any other person making such Complaint, made false accusation (including producing forged or misleading document) against the Respondent, the so-called Aggrieved person or any other person making the Complaint would become liable for appropriate disciplinary action.
- xi. A mere failure to substantiate a Complaint or provide an adequate proof shall not attract action against the Aggrieved Person.
- xii. The malicious intent on the part of the Aggrieved Person shall be established after an inquiry in accordance with the procedure prescribed by the Committee before any disciplinary action is recommended.

8. Protection Against Victimization/Retaliation

- i. The Adani Group shall not accept, support nor tolerate victimization or retaliation measures of any kind against any person, who acting in good faith, reports act of Sexual Harassments. It shall be considered and treated as major misconduct
- ii. Any person who engages in such retaliation/ victimization, directly or indirectly or encourages others to do so, may be subject to appropriate disciplinary action.
- iii. Victimization or Retaliation shall be treated as seriously as Sexual Harassment even if the original Sexual Harassment Complaint is not proven.
- iv. Anyone feeling that a complaint of victimization or retaliation did not get a prompt response can raise grievance with the Group Committee.

9. Confidentiality

It is to be noted that the Minutes of the Meeting of the Committees, the findings, recommendations, decisions of the Committees and any document or any verbal communication shall be kept strictly confidential, and the members shall not divulge the details to any other Employee within or to any person outside the company.

Also, to other employees involved in such discussions, the members should emphasize the necessity for maintaining confidentiality and the consequences of possible disciplinary action in case of transgression.

Human Resources	 Prevention of Sexual Harassment of Women at Workplace	Doc No: HR/PLCY/09
		Revision No: Original Version
		Issue Date: 01-04-2024

Enclosed table shows ICC (Internal Complaint Committee) formed Under POSH Act

Company	ICC Members name						
	Presiding Officer	Member I	Member II	Member III	Member IV	Member V	Member VI
Mumbai International Airport Ltd.	Poly Singh Arora General Manager - HRBP	Shrivardhan Deshpande Head-Legal	Komal Desai AGM - Guest Relations	Priyanka Rajan DGM - Corporate Communications	Vasanti Kunder External Legal Advisor		
Ahmedabad International Airport Ltd.	Ashwini Thorat Chief Design & Planning	Neha Bagrecha AGM - Projects	Kshitija Joshi Associate Manager - Security	Lokesh Sharma Associate Manager - Human Resources	Ujjwal Kumar Sr. Manager-Legal	Rajiv Shah External - Adv.	
Guwahati International Airport Ltd	Manima Baruah Associate Manager - Quality	Srinivasan Gangadhara DGM - Aero Operation	Arnab Phonglosa Manager - Human Resource	Polly Vouquiline External - Professor Guwahati University			
Lucknow International Airport Ltd.	Mugdha Mishra Sr. Manager - Human Resource	Shashi Kumar GM - E&M & MEP (Project)	Ashok Ranwa Chief Security officer	Abhishek Vishwanath Sr. Manager - Legal	Shilpi Saxena Associate Manager - Projects	Mishi Sahai Deputy Manager - Terminal Ops.	Devika Ayush External - Member of NGO
Thiruvananthapuram International Airport Ltd.	Roopa Mathew Sr. Manager - Terminal Ops	Sweety Philp Manager - Contract Administration	Priya P R Assistant Manager - Terminal Ops	Josy Joseph Manager - Human Resource	Rejitha G External - Research fellow in Woman's Studies		
Mangalore International Airport Ltd.	Mimsiya M Assistant Manager - Duty Terminal Manager	Vipin Nair DGM - HR & Admin	Syed Aqdu Senior Manager-Legal & Compliance	Shilpa K N Assistant Manager - Horticulture	Rohini Hande P N External - Adv.		
Jaipur International Airport Ltd.	Janhavi Poul AGM - Terminal design	Sanjeev Bhardwaj Sr. Manager - Aero Operations	Janmajay Singh Chief Security officer	Anita Kataria Assistant Manager - Cybersecurity	Kirti Sharma Assistant Manager - Human Resource	Sandeep Anand External Member	
Adani Airport Holdings Ltd.	Ekta Ghosh Chief Digital Officer	Shashank Anand DGM - Legal	Archana Muthappa GM - Corporate Communication	Anchal Dixit Manager - Human Resource	Rajiv Shah External - Adv.		
Adani Global Air Cargo Solutions Ltd.	Anchal Dixit Manager - Human Resource	Saurabh Suradkar Deputy Manager - Human Resource	Pradeep Nair Sr. Manager - Station Lead	Trupti Mehra Assistant Manager - Commercial Contracts	Vasanti Kunder External Member		
Navi Mumbai International Airport Ltd.	Poonam Davre General Manager Human Resources	Pushpa Pandey AGM - Airside Operation	Ravindra Dalavi AVP - Project Control	Sandeep Kumar Singh VP - Human Resource & IR	Sujata Ashtekar External Social Worker		

