



**Gujarat Energy Limited**  
*(Erstwhile Gujarat Gas Limited)*

**Anti - Harassment Policy**

**[Effective from: 14<sup>th</sup> May, 2026]**

## **Anti - Harassment Policy**

### **1. Objective**

- a. To ensure that all employees of Gujarat Energy Limited (“**the Company**”) are provided a working environment at all workplaces which is free from racial and /or sexual harassment, intimidation against employees with disabilities, and any other form of harassment constituting unacceptable behaviour which is personally offensive; through the promotion of a safe and healthy environment at the Company’s workplaces where each and every employee of the Company is able to work freely with dignity and achieve their full potential.
- b. To proactively prevent any incidents of harassment, including sexual harassment, at workplaces, which vitiate the work environment, and also to address such incidents when they occur.
- c. To define the terms “harassment” and “sexual harassment” and provide a more effective and comprehensive mechanism for the receipt of complaints in respect of harassment and/or sexual harassment, and for investigation into such incidents at the Company’s workplaces and final determination of such complaints.

### **2. Definition**

All terms defined in the Anti - Harassment Policy shall be applicable to these Guidelines wherever required and for the purposes of these Guidelines, unless the context otherwise requires:

- a. “**Accused**” means the person against whom a Complaint of Harassment and/or Sexual Harassment is made in the manner provided in these Guidelines.
- b. “**Company**” shall mean Gujarat Energy Limited and its subsidiaries.
- c. “**Complainant**” means either a Company’s employee who has made a complaint of Harassment and/or Sexual Harassment, or the Management as the case may be, in the manner provided under these Guidelines.
- d. “**Complaint**” means any complaint lodged either by a Company’s employee or by the Management alleging Harassment and/or Sexual Harassment and which is made or received in writing as per these Guidelines.
- e. “**Enquiry**” shall mean and include the proceedings conducted by the Enquiry Committee, but shall not include an Investigation or a preliminary inquiry conducted by the Internal Investigation Committee.
- f. “**Enquiry Committee**” means the committee duly constituted under these Guidelines for holding an Enquiry into the complaints of misconduct amounting to Sexual Harassment.
- g. “**Guidelines**” means these guidelines (along with any subsequent clarifications and/or any amendments thereto) for providing an effective mechanism / procedure for receiving, investigating and enquiring into and dealing with and redressing complaints

of Harassment and/or Sexual Harassment under the Company's Anti - Harassment Policy.

- h. "Harassment"** includes (but is not limited to) any of the following acts / conduct:
  - i. unwanted verbal conduct such as unwelcome advances, patronizing titles or nicknames, propositions or remarks, innuendoes, lewd comments, jokes, banter or abusive language, which directly or indirectly refers to a person or a person's gender, colour, caste, community, religion, social class, race, ethnic or national origins, employment status, age, disability, marital status, or sexual preferences, membership or non-membership of any organization or association, etc. or
  - ii. repeated suggestions for unwanted social activities inside or outside the workplace; or
  - iii. persistent criticism and personal abuse, either in public or in private, which humiliates or demeans the individual; or
  - iv. behavior which denigrates or ridicules, or is intimidatory or physically abusive of an employee; or
  - v. Making a malicious or a wrongful complaint of Harassment against another fellow employee; but does not include Sexual Harassment.
- i. "Internal Investigation Committee"** means the Committee duly constituted under these Guidelines for conducting Investigation into Complaints of misconduct amounting to Harassment.
- j. "Investigation"** shall mean and include the proceedings of the Internal Investigation Committee but shall not include the proceedings of the Enquiry Committee.
- k. "Management"** shall mean all employees of the Company not below the rank of a Leadership Level or any authorized committee / members as and when deputed by company.
- l. "Sexual Harassment"** includes any unwelcome sexually determined behavior such as physical contact, sexually coloured written and oral remarks, innuendos, showing pornographic material or making sexual demands or any other, unwelcome physical, verbal or non-verbal conduct of a sexual nature, and shall mean to include the following sexually determined conduct, without in any manner limiting the meaning thereof:-
  - i. An implied or overt promise of preferential treatment in that employee's employment; or
  - ii. An implied or overt threat of detrimental treatment in that employee's employment or an implied or overt threat about the present or future employment status of that employee and includes the creation of a hostile working environment; or
  - iii. Conduct which interferes with an employee's work or creates an intimidating, hostile or offensive work environment; or
  - iv. Such conduct which can be humiliating and may constitute a health and safety problem.

*Explanation 1:*

For the purpose of this definition and these Guidelines “Hostile Environment” means a work environment where unwelcome sexually determined verbal, non-verbal or physical behaviour is severe and pervasive enough to interfere with the victim’s work performance or be intimidating or offensive to a reasonable person.

*Explanation 2:*

It is clarified that it is the reasonable perception of the Complainant that would be relevant in determining whether any conduct was sexually determined and, if so, whether such conduct was unwelcome or not and that his/her objection would disadvantage him/her in connection with his/her employment, including recruitment or promotion, or whether it creates a hostile working environment.

*Exception I:*

Friendships with other employees where both persons consent, shall not amount to Sexual Harassment.

*Exception II*

Appropriate jokes, conduct or comments or fair comments not intended to be offensive or upsetting shall not amount to Sexual Harassment.

- m. **“Workplace” shall mean any branch, office, unit, site, establishment, premises** belonging to the Company (or any of its subsidiaries) where any commercial activity is carried on including but not limited to production, supply, sale, distribution or any other service connected with the business activities of the Company and also includes guesthouses of the company and any other place(s) visited by an employee arising out of, or during and in the course of, employment.

### **3. Scope**

- a. This policy is applicable to all employees of the Company.
- b. All contract employees, retainers, trainees, apprentices, Ad hoc or daily wage basis, probationer, fixed time hires and third party personnel who visit and / or work in the Company premises and temporary employees are also expected to abide by this policy.
- c. This Policy is to cover notional extended workplaces as well; which can also include the cyber space.

### **4. Guidelines**

- a. **Prohibition of Harassment / Sexual Harassment:** No employee shall harass and/or sexually harass another employee. For avoidance of all doubts in this regard it is hereby clarified that the said prohibition shall apply to employees of the Company and its subsidiaries at all times regardless of whether the harassment occurs in / at the

workplace, or at a place where the said person has gone in connection with the work or while on official tours or while in transit.

- b. Effect of other policies, guidelines and Standard Operating Procedure, etc.:** The provisions of these Guidelines shall have an overriding effect, notwithstanding anything inconsistent therewith, over anything contained in any other policy/policies, guidelines, Rules or Standard Operating Procedures of the Company. Where the provisions of all or any of the policy/policies, guidelines, Rules or Standard Operating Procedures of the Company are silent as to the procedure, conduct or redressal of grievances of an employee in the case of Sexual Harassment, the provisions under these Guidelines shall prevail over such policy/policies, guidelines, Rules or Standard Operating Procedures of the Company.
- c. Procedure for lodging and receipt of complaints and procedure to be followed thereafter.**
- i. Any employee, hereinafter referred to as the complainant, who alleges Harassment and / or Sexual Harassment may submit the complaint in writing to the Head – Human Resources (Head HR). The written complaint may contain such details / particulars which are fairly indicative of the misconduct of the Accused and the nature of the Harassment and/ or Sexual Harassment alleged and shall preferably be in the format prescribed by the Company for this purpose set out at Annexure – I to these Guidelines. Further, wherever applicable, the Complainant shall also provide details of any witnesses present at the time of such misconduct.
  - ii. Based upon the complaint provided by the complainant, the Head HR shall, on receipt of such Complaint, determine whether the misconduct complained of is an act of “Harassment” or that of “Sexual Harassment” and shall thereafter either forward the complaint to the Internal Investigation Committee or to the Enquiry Committee, as the case may be, for necessary action as provided under these guidelines.
  - iii. In cases where the complainant wishes to make an oral complaint, the Head HR shall inform the complainant about the option of having his/her complaint recorded in writing either by the Head HR or if so desired by the complainant (where the complainant is a woman) by another woman employee so nominated by the Head HR. Where the complaint is reduced to writing as aforesaid, the contents of such writing shall be read over and explained to the complainant. The complaint shall then be authenticated by obtaining the signature of the Complainant on such writing and a copy of the same shall be furnished to the complainant. Where the complaint has been recorded by any woman pursuant to a specific wish expressed by a woman complainant as aforesaid, the same shall be recorded by the Head HR at the foot of the complaint so recorded. The woman employee so nominated by the Head HR to record and reduce the oral complaint of the complainant shall maintain utmost secrecy and confidentiality of the facts recorded and shall not reveal or divulge the same to any person.

- iv. If the complainant does not wish to have the complaint recorded in writing as set out in above guideline or if the management receives information / details about an incident of Harassment and/or Sexual Harassment from any other source which requires to be investigated and redressed then the management shall, through the Head HR file a complaint in the format set out in Annexure – I to these guidelines directly with the Internal Investigation Committee or the Enquiry Committee, as the case may be.
- v. Constitution of the Internal Investigation Committee and Enquiry Committee
- d. Internal Investigation Committee:** The Internal Investigation Committee shall consist of three members, the first member being a chairperson who shall be a senior member nominated by the Managing Director, Gujarat Energy Limited and who shall not be below the Leadership Level and the other two members (One lady is must) being nominated by the Management. The Internal Investigation Committee shall act independently and shall maintain secrecy and confidentiality at all times and especially during the course of its proceedings.
- e. Enquiry Committee/ Internal Complaints Committee:** An Enquiry Committee shall be constituted by the Managing Director, Gujarat Energy Limited and shall consist of 5 members. However, in the event the complaint is made against the Managing Director then the Enquiry Committee shall be constituted by the Chairman, Gujarat Energy Limited and shall consist of 5 members. The Enquiry Committee so constituted as aforesaid shall be headed by a Presiding Officer who shall be a woman working at senior level of the Company.

The other four members of the Enquiry Committee shall be,

- a. Any person holding the position of a Leadership Level of the Company or above,
- b. A representative from the Company's Legal Group, and
- c. Two other lady members (out of which one shall be external who is committed to the cause of women or working with NGO or a person familiar with the issues related to the sexual harassment).

Under no circumstances shall the number of members on the Enquiry Committee exceed 5 (five). The Enquiry Committee shall act independently and shall maintain secrecy and confidentiality at all times and especially during the course of its proceedings.

**f. Procedure for Investigation of the Internal Investigation Committee:**

The Internal Investigation Committee shall act independently and impartially and follow the principles of natural justice for the purposes of Investigation of the complaint. The procedure to be followed for Investigation into acts of misconduct amounting to Harassment shall be as follows:

- 1. Upon receipt of the complaint, the Internal Investigation Committee shall conduct a preliminary inquiry to ascertain the veracity of the complaint and where the Internal Investigation Committee finds that there is substance in the complaint it shall proceed with the Investigation as provided hereinafter upon recording the

reasons thereof. In the event the Internal Investigation Committee comes to a preliminary finding that there is substance in the complaint as aforesaid it shall be bound to initiate and conduct the Investigation. In such an event where the Internal Investigation Committee forms a preliminary opinion as aforesaid, the Internal Investigation Committee may also make a recommendation to the Head HR proposing the suspension of the accused and / or transfer of the accused from the present place of employment pending Investigation. The Head HR shall take appropriate action upon receiving such a recommendation from the Internal Investigation Committee. However, where the Internal Investigation Committee finds that the Complaint is without substance the Internal Investigation Committee shall record its findings along with its reasons and communicate the same to the complainant and the Head HR.

2. At the request of the Complainant, the Internal Investigation Committee may before initiating an Investigation, take steps to settle the matter between the Complainant and the Accused through conciliation. Where a settlement is arrived at, no further Investigation shall be conducted and the Internal Investigation Committee shall record the settlement and may make a recommendation to the Head HR not to take any action against the Accused. A copy of the settlement so arrived at shall be provided to both the Complainant as well as the Accused.
3. The Internal Investigation Committee shall record the statement of the complainant and call upon the complainant to furnish such evidence as may be deemed fit and necessary. To ensure timely action, fair treatment and completion of the proceedings, the Internal Investigation Committee shall be, amongst other things, empowered to:
  - a. compel attendance of any employee and examining him/her;
  - b. require the complainant or the accused and/or any of the witnesses (if any) to record their statement in the form of an affidavit;
  - c. Compel the production of documents and material objects; and
  - d. To initiate such other steps as may be necessary to ensure a fair and effective Investigation.
4. Where the Internal Investigation Committee finds that the Accused has not committed an act of misconduct amounting to Harassment the Committee shall close the proceedings upon recording its findings as also the reasons thereof in the Investigation Report. Further, where the Internal Investigation Committee prima facie finds that Complaint of Harassment is motivated and/or is frivolous, vexatious and/or malicious, the Committee shall record the same in its Investigation Report as preliminary findings and shall initiate and conduct an Investigation into this matter of a false complaint as if the same amounts to an act of Harassment under these Guidelines.
5. The Internal Investigation Committee shall endeavor to expedite the completion of the Investigation within 60 (sixty) days from the date of the receipt of the Complaint. Upon completion of the Investigation, the Internal Investigation

Committee shall prepare and submit an Investigation Report to the Head-HR and a copy of the same shall also be furnished to the Complainant and the Accused.

**g. Proceedings subsequent to the Investigation:**

Based upon the Investigation Report submitted by the Internal Investigation Committee, the Head HR shall decide upon the disciplinary action to be initiated against the Accused and initiate appropriate disciplinary action as envisaged under these Guidelines. The Accused and the Complainant shall also be separately informed of the disciplinary action so decided.

**h. Proceedings of the Enquiry Committee/ Internal Complaints Committee:**

The Enquiry Committee shall conduct the proceedings affording both parties equal right to be heard and shall adhere to the principles of natural justice. The Enquiry Committee shall act independently and impartially for the purposes of holding an Enquiry of the Complaint and shall also endeavor to maintain utmost secrecy and confidentiality with regards to its proceedings. The procedure to be followed for an Enquiry into the acts of misconduct amounting to Sexual Harassment shall be as follows:

1. Upon receipt of the Complaint, the Enquiry Committee shall conduct a preliminary inquiry to ascertain the veracity of the Complaint and where the Enquiry Committee finds that there is substance in the Complaint, it shall proceed with the Enquiry as provided hereinafter upon recording the reasons thereof. In the event the Enquiry Committee comes to a preliminary finding that there is substance in the Complaint as aforesaid it shall be bound to initiate and conduct an Enquiry. In such an event where the Committee forms a preliminary opinion as aforesaid, the Committee may also make a recommendation to the Head-HR proposing the suspension and / or the transfer of the Accused from the present place of employment pending Enquiry. In such an event, the Head HR shall immediately issue a directive to the Accused suspending the Accused pending Enquiry in accordance with the Policy. However, where the Enquiry Committee finds that the Complaint is without substance the Committee shall record its findings along with its reasons and communicate the same to the Head HR and the Complainant.
2. At the request of the Complainant, the Enquiry Committee may prior to initiating an Enquiry, take steps to settle the matter between the Complainant and the Accused through conciliation. Where a settlement is arrived at as aforesaid, no further Enquiry shall be conducted and the Enquiry Committee shall record the settlement and may make appropriate recommendations to the Head HR with respect to any action to be taken against the Accused. A copy of the settlement shall be provided to both the Complainant as well as the Accused.
3. Where the conduct of Sexual Harassment amounts to an offence under the Indian Penal Code, 1860 (45 of 1860) or under any other law in force, it shall be the duty of the Enquiry Committee to inform the Complainant about his/her right to initiate action in accordance with law and recommend that the Head HR to take appropriate action. Any such action or proceedings if initiated by the Complainant shall be in addition to the proceedings initiated under these Guidelines. Irrespective of the fact

that the Complainant and/or the Head HR opts to initiate such criminal proceedings under the Indian Penal Code, 1860 (45 of 1860) or under any other law, the Enquiry Committee shall be bound to initiate and conduct the Enquiry

4. The Enquiry Committee shall record the statement of the Complainant and call upon the Complainant to furnish such evidence as may be deemed fit and necessary. To ensure timely action, fair treatment and completion of the proceedings, the Enquiry Committee shall be, amongst other things, empowered to
    - a. compel attendance of any employee and examine him/her;
    - b. require the Complainant or the Accused and/or any of the witnesses (if any) to record their statement in the form of an Affidavit;
    - c. compel the production of documents and material objects;
    - d. to initiate such other steps as may be necessary to ensure a fair and effective Enquiry.
  5. At any given time the full strength of the Enquiry Committee shall not exceed 5 (five) members. For an effective hearing and for the proceedings of the Enquiry Committee to be valid the presence of a minimum of 3 (three) members of the Enquiry Committee is necessary (“Quorum”). To constitute a valid Quorum the following three members must be present at the time of the hearing/proceedings held by the Enquiry Committee:
    - a) The Presiding Officer
    - b) One lady member
    - c) Any other member
  6. If at any given time, the Quorum is not constituted the Enquiry Committee shall not proceed with the Enquiry.
  7. Where the Enquiry Committee finds that the Accused has not committed an act of misconduct amounting to Sexual Harassment, the Enquiry Committee shall close the proceedings upon recording its findings as also the reasons thereof in the Enquiry Report. Further, where the Enquiry Committee prima facie finds that complaint of Sexual Harassment is motivated and/or is frivolous, vexatious and/or malicious, the Enquiry Committee shall furnish the copy of the Enquiry Report containing its preliminary findings to this effect along with its reasons in support of its findings to the Head HR.
  8. The Enquiry Committee shall endeavor to expedite the completion of the Enquiry within 60 (sixty) days from the date of the receipt of the Complaint. Upon completion of the Enquiry, the Enquiry Committee shall prepare an Enquiry Report. In the event the Enquiry Committee finds that the Accused has committed an act of misconduct amounting to Sexual Harassment, the Enquiry Committee shall submit the Enquiry Report to the Head HR and a copy of the same shall also be furnished to the Complainant and the Accused.
- i. Proceedings subsequent to the Enquiry**
- i. Based upon the Enquiry Report submitted by the Enquiry Committee, the Head HR shall decide upon the disciplinary action to be initiated against the Accused

and initiate appropriate disciplinary action as envisaged under these Guidelines. The Accused and the Complainant shall also be separately informed of the disciplinary action so decided.

- ii. The Enquiry Committee shall not be bound by the provisions of the Indian Evidence Act, 1872 and/or the Code of Civil Procedure, 1908. The Enquiry Committee shall be free to devise its own procedure while adhering to the principles of natural justice and fair play. Both the parties i.e. the Complainant and the Accused shall have the right to adduce evidence both oral and documentary and produce their own witnesses.

**j. Disciplinary Action:**

- i. Disciplinary Action for misconduct amounting to Harassment and/or Sexual Harassment, as the case may be:
- ii. Head – HR shall, after taking into consideration the nature of misconduct of the Accused, his/her habitual behavior (if any) and after taking into account the findings of the Enquiry Committee in its Enquiry Report or the findings of the Internal Investigation Committee in the investigation Report, as the case may be, initiate such Disciplinary Action as deemed fit under the Policy which may include any or a combination of the following disciplinary actions:
  - 1. Written Warning;
  - 2. Reprimand;
  - 3. Suspension;
  - 4. Stoppage of annual increments with cumulative effect not exceeding 3 annual increments;
  - 5. Fine not exceeding 2 (two) months net salary of the Accused;
  - 6. Reduction in Rank
  - 7. Stoppage of Promotion
  - 8. Removal from Service i.e. Dismissal

**k. Conditions to be imposed in addition to the Disciplinary Action:**

- i. The Head HR shall, wherever he deems fit and necessary, also be empowered to impose such further and other conditions upon the Accused in addition to the Disciplinary Action provided under these guidelines, such as direction to furnish a letter of apology to the Complainant, direction to the Accused to execute a bond of good conduct, placing the Accused under observation and such other conditions as the circumstances of the case may warrant.

**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 between the Act & Policy, the provision of Act shall prevail.**

5. The above terms are subject to modifications / amendments / alterations by the management at any time depending on business requirements. In case of any doubt, the interpretation of the above terms by Head - HR Department shall be final.

**6. List of References / Annexures / Format:**

Annexure I: Format of complaint as per the guidelines framed under the Company's Anti - Harassment Policy

**Committees:**

Internal Investigation Committee

- a) The Chairperson
- b) One lady member
- c) Any other member

Enquiry Committee

- a. A lady Presiding officer
- b. Any person holding the position of a Leadership Level of the Company or above,
- c. A representative from the Company's Legal Group
- d. Two other lady members (one should be external).

**7. Policy Review**

In case the Policy is required to be amended due to any change in the regulatory requirement or due to any other reasons, the Policy shall be appropriately modified with the approval of the Managing Director of the Company.

**8. Dissemination of Policy**

This policy will be uploaded on the website of the company and internally shared with all the relevant stakeholders.

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**Annexure I**

**Format of complaint as per the guidelines framed under Gujarat Energy Limited's Anti - Harassment Policy**

1. Name (of Complainant):
2. Department:
3. Designation:
4. Level:
5. Location (of Employment):
6. Employee No:
7. Name and Designation of Person against whom the Complaint is filed:
8. Date, Place and Time of the occurrence of misconduct complained of:
9. Particulars of the act of misconduct:

Name and Designation of Person against whom the Complaint is filed	Date, Place and Time of the occurrence of misconduct complained of	Particulars of the act of misconduct

Names of witnesses, if any:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Any other details which the Complainant wishes to provide:

Annexures, if any:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_

Declaration:

I, \_\_\_\_\_, do hereby declare that I have read and fully understood the contents of the Guidelines holding an Investigation / Enquiry into complaints received under the Company's Anti - Harassment Policy and for final determination in respect thereof.

\_\_\_\_\_  
**Signature of the Complainant**

**Name:**

\_\_\_\_\_  
Date

\_\_\_\_\_  
Place