

	APEX COCO AND SOLAR ENERGY LIMITED	Doc No : APEX/POL/07
		Rev No : 0.0
POSH POLICY		Date : 01/04/2023

POSH POLICY

Objective

This Policy on Prevention of Sexual Harassment at Workplace (POSH) sets out Apex Coco and Solar Energy Limited’s commitment to providing a safe, dignified, and inclusive work environment free from sexual harassment and discrimination.

The objectives are to prevent unacceptable conduct through awareness and training, to enable prompt and fair redressal of complaints by an Internal Committee constituted in accordance with applicable law, and to reinforce a culture of respect, accountability, and zero tolerance for harassment, retaliation, or victimization.

The Policy complements our Codes of Conduct and Diversity, Equity, and Inclusion commitments and applies to all persons engaging with the Company, including business partners and customers, in the course of work.

Scope

This Policy applies to Apex Coco and Solar Energy Limited across all offices, manufacturing sites, warehouses, project locations, field operations, and digital workplaces, including remote work settings and business travel, meetings, trainings, conferences, social events organised or sponsored by the Company, and any location where work-related interactions occur.

It covers employees on permanent, fixed-term, trainee or apprentice status, contractors, consultants, interns, volunteers, and individuals employed through third parties. It also extends to visitors, business partners, and clients when they interact with our personnel at the workplace or in a work context.

Definitions

Sexual harassment includes any one or more unwelcome acts or behaviour, whether directly or by implication, such as physical contact and advances, a demand or request for sexual favours, making sexually coloured remarks, showing pornography, or any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature. The workplace includes offices and sites under the control of the Company, locations visited by employees arising out of or during the course of employment, and virtual environments used for work.

Aggrieved Woman refers to any woman, whether employed, visiting, or participating in work activities, who alleges to have been subjected to sexual harassment at the workplace;


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for inclusivity and fairness, this Policy shall be applied to all genders for complaint handling and protection, without diluting statutory safeguards. Respondent refers to the person against whom a complaint of sexual harassment has been made. Internal Committee refers to the body constituted by each Company to receive and redress complaints in accordance with applicable law and this Policy.

Policy Statement

Apex Coco and Solar Energy Limited adopt a zero-tolerance stance towards sexual harassment. We shall constitute one or more Internal Committees with a Presiding Officer who is a senior woman employee, two or more members committed to the cause of women or with legal or social work experience, and the Committee shall function with independence, confidentiality, and sensitivity.

The Company will take all reasonable steps to prevent harassment, including regular communication, training, and visible leadership commitment, and will ensure timely, impartial investigations and appropriate disciplinary action when violations are established.

Prohibited Conduct

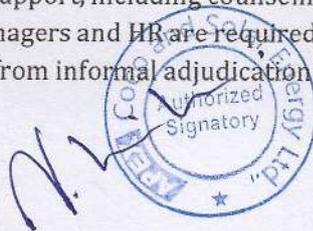
The following conduct is strictly prohibited: unwelcome sexual advances or physical contact; requests or demands for sexual favours linked to employment benefits or threats of adverse action; sexually coloured, derogatory, or offensive remarks; display or transmission of sexually explicit or suggestive content through any medium; stalking or persistent unwanted attention; behaviour that creates a hostile or intimidating work environment; and any retaliatory action against a person who, in good faith, raises a concern or participates in an inquiry. The prohibition applies irrespective of seniority, employment status, or location, including virtual collaboration platforms.

Reporting and Assistance

Any aggrieved person should promptly report concerns to the Internal Committee by email, portal, written complaint, or in person. Complaints should ordinarily be made within three months of the incident or of the last incident in a series, and the Committee may extend this period if it is satisfied that circumstances prevented timely filing. The Company encourage early reporting and provide support, including counselling and reasonable assistance in documenting complaints. Managers and HR are required to guide individuals to the Internal Committee and must refrain from informal adjudication or discouraging complaints.



Prepared By



Approved By

Page 2 of 5

	APEX COCO AND SOLAR ENERGY LIMITED	Doc No : APEX/POL/07
		Rev No : 0.0
	POSH POLICY	

Conciliation and Inquiry Process

Upon receipt of a complaint, the Internal Committee will acknowledge it, assess jurisdiction, and offer conciliation at the request of the aggrieved person, provided that monetary settlement shall not be the basis of conciliation. If conciliation is not sought or fails, the Committee will commence a formal inquiry following principles of natural justice, giving both parties a fair opportunity to present evidence and witnesses. The Committee may recommend interim measures, including transfer, leave, or changes in reporting, to protect the aggrieved person during the inquiry. The inquiry shall be completed expeditiously, ordinarily within ninety days, and a reasoned report with recommendations shall be submitted to the Employer for implementation within sixty days.

Confidentiality and Non-Retaliation

All proceedings, identities of parties and witnesses, and recommendations shall be treated as confidential and disclosed only on a strict need-to-know basis or as required by law. Company prohibit retaliation against any person who, in good faith, reports a concern, provides information, or participates in proceedings. Retaliation includes threats, intimidation, harassment, adverse employment action, or interference with work. Any breach of confidentiality or retaliation will be treated as misconduct and may attract disciplinary action.

False or Malicious Complaints

The Company recognise that the majority of complaints are made in good faith. If the Internal Committee concludes that a complaint was malicious or knowingly false, it may recommend appropriate action after considering the evidence and the circumstances, ensuring that mere inability to substantiate a complaint does not by itself attract disciplinary measures against the aggrieved person. The Company will approach unproven matters with sensitivity and without presumption of wrongdoing by either party.

Roles and Responsibilities

Employer responsibilities include creating a safe working environment, displaying statutory notices, organising awareness programmes, constituting and supporting the Internal Committee, and providing access to resources required for fair inquiry. Employees and managers must model respectful behaviour, attend trainings, cooperate with inquiries, and promptly escalate concerns to the Internal Committee. Business partners and third-party workers are expected to comply with this Policy while on our premises or interacting with our personnel, and contracts shall incorporate obligations consistent with this Policy.


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Training and Awareness

The Company will conduct periodic training for employees, managers, Internal Committee members, and contract staff, covering definitions, examples, bystander intervention, reporting mechanisms, digital conduct, confidentiality expectations, and consequences of violations. Inductions will include an overview of this Policy and reporting channels. Leadership communications will reinforce expectations and encourage respectful, inclusive behaviour across all locations and teams.

Data Protection and Record Keeping

Records of complaints, proceedings, and actions taken shall be maintained securely by HR or the Internal Committee for the period required under law and policy. Personal data processed during POSH proceedings will be handled in accordance with applicable privacy requirements, with limited access, purpose limitation, and safeguards proportional to sensitivity. The Company will implement reasonable security measures to protect records from unauthorised access, disclosure, or loss.

Disciplinary Action

Where the Internal Committee finds that sexual harassment occurred, disciplinary consequences may include written apology, counselling, warning, suspension, transfer, demotion, loss of privileges, recovery of benefits, or termination, depending on severity and context. The Company may also recommend measures to restore the aggrieved person’s dignity and workplace safety, including coaching for teams, supervisory changes, and review of local practices to prevent recurrence. Where no violation is established, appropriate steps shall be taken to normalise working relationships and protect all parties from stigma.

Appeal and Review

Parties may avail the statutory right of appeal within the prescribed period to the competent authority or as provided by law. The Company may conduct periodic reviews of Internal Committee functioning, case volumes, training coverage, and outcomes to continually improve prevention and redressal mechanisms, while maintaining confidentiality and fairness.

Communication and Amendments

This Policy shall be published on Company portals, displayed at prominent places of work, and made available upon request. Amendments may be made to reflect changes in law, organisational structure, or best practices, following approval by the Policy Owner and the



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Board. Any changes will be communicated to employees and business partners and incorporated into training and induction materials.

Effective Date

This Policy is effective from the date indicated above and supersedes any prior policies on workplace sexual harassment issued by Apex Coco and Solar Energy Limited. It shall be read with the respective Codes of Conduct and disciplinary procedures of each Company, and any local addenda required for specific locations or statutory requirements shall be issued by HR and made available to employees.



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Page 5 of 5