

TWENTYFIRST CENTURY MANAGEMENT SERVICES LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT (POSH) AT THE WORKPLACE

Effective Date: 27-05-2026

Approved By: Board of Directors

1. Objective

W.S. Industries (India) Limited ("the Company") is committed to providing a work environment that ensures every employee is treated with dignity and respect, free from any form of harassment, including sexual harassment. This Policy aims to prevent, prohibit, and provide redressal for sexual harassment at the workplace in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** ("PoSH Act").

2. Scope

This Policy is applicable to:

- All employees (permanent, temporary, contractual, interns, and trainees).
- All women (including third parties and clients) who may be present in the workplace.
- All locations where the Company operates, including project sites, remote work, and of-site work-related events.

3. Definition of Sexual Harassment

Sexual harassment includes any one or more of the following unwelcome acts or behavior (whether directly or by implication):

- Physical contact or advances
- A demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

It also includes:

- Implied or explicit promise of preferential treatment
- Threat of detrimental treatment or dismissal
- Creating an intimidating, offensive, or hostile work environment
- Humiliating treatment affecting mental health or safety



4. Internal Complaints Committee (ICC)

The Company shall constitute an **Internal Complaints Committee (ICC)** at each office or project location where 10 or more employees are employed. The ICC shall comprise of at least **three members** from within the Company, and **one external member** who has experience with sexual harassment issues or is from an NGO committed to women's rights. The external member is important to ensure impartiality and provide expertise in handling complaints.

Term: Each ICC member shall hold office for a period not exceeding **three years**.

The Company reserves the right to modify the composition of the ICC, replacing members as necessary, to ensure the committee's effectiveness and compliance with applicable laws. Changes in ICC members shall be communicated promptly to all employees.

The present ICC details are given in Annexure-1.

5. Complaint Mechanism

a. Filing a Complaint

- A written complaint must be submitted by the aggrieved woman within **3 months** of the incident.
- In case of physical or mental incapacity, a legal heir or representative may file the complaint.

b. Redressal Process

- Upon receipt, the ICC shall conduct a preliminary inquiry and, if required, initiate a formal investigation.
- Both parties will be given an opportunity to be heard.
- The inquiry shall be completed within **90 days**, and the report submitted to management within **10 days** thereafter.
- Disciplinary action shall be taken within **60 days** of the report submission.

6. Interim Measures

During the pendency of an inquiry, the ICC may recommend:

- Transfer of either party
- Grant of leave to the aggrieved woman (up to 3 months)
- Restraining contact between parties



7. Disciplinary Action

If the complaint is proven true, disciplinary action may include:

- Written apology
- Warning or reprimand
- Suspension or termination
- Deduction of compensation payable to the aggrieved woman

8. Protection Against Retaliation

The Company strictly prohibits retaliation against any employee who lodges a complaint or participates in an inquiry. Any retaliation or victimization will be treated as a separate offense.

9. Malicious Complaints

If the ICC concludes that the complaint was false or malicious, disciplinary action may be recommended against the complainant. However, the inability to substantiate a complaint does not automatically mean it was false or malicious.

10. Confidentiality

All proceedings, including identities of parties and witnesses, will be kept **strictly confidential**. Any breach of confidentiality by any person involved shall attract disciplinary action.

11. Awareness & Training

The Company shall:

- Display the PoSH Policy at prominent places in the office.
- Conduct periodic awareness and sensitization programs.
- Ensure ICC members are trained regularly.

12. Policy Review

This Policy shall be reviewed periodically and may be amended by the management as authorized by the Board of Directors, to ensure its compliance with legal updates, operational needs, and other relevant factors. The management is further authorized to make changes to the members of the Internal Complaints Committee (ICC) and appoint suitable persons as deemed necessary, in accordance with the PoSH Act, 2013, based on operational requirements, availability, or other relevant factors.

This policy is amended and approved by the Board of Directors at their meeting held on 27.05.2026.



Annexure - 1

TWENTYFIRST CENTURY MANAGEMENT SERVICES LIMITED

RECONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC)

(Pursuant to the PoSH Act, 2013)

In accordance with the Policy on Prevention of Sexual Harassment (PoSH) at the Workplace, approved by the Board of Directors at their meeting held on 27th May, 2026 and pursuant to the authority granted to the Management under Clause 12 of the said Policy, the composition of the Internal Complaints Committee (ICC) of Twentyfirst Century Management Services Limited has been reconstituted.

The reconstitution has been carried out consequent to the cessation of the earlier Presiding Officer and to ensure continued compliance with the provisions of the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* and the Company's Policy.

The reconstituted ICC, with effect from 01st April, 2026, is as follows:

Internal Complaints Committee

Name	Designation	Email ID	Role
Mr. Bhaskar Shetty	Chief Financial Officer	bhaskar@tcssdirect.com	Committee Member
Ms. Jayalaxmi Mukta	Senior Manager – Accounts	java@tcssdirect.com	Committee Member

The above reconstitution is made, to ensure continues compliance with Company's policy and the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

All other provisions of the PoSH Policy remain unchanged.

For Twentyfirst Century Management Services Limited

Sd/-

Bhaskar Shetty

Chief Financial Officer



Annexure - 1

TWENTYFIRST CENTURY MANAGEMENT SERVICES LIMITED

RECONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC)

(Pursuant to the PoSH Act, 2013)

In accordance with the 'Policy on Prevention of Sexual Harassment (PoSH) at the Workplace, approved by the Board of Directors at their meeting held on 27th May, 2026 and pursuant to the authority granted to the Management under Clause 12 of the said Policy, the composition of the Internal Complaints Committee (ICC) of Twentyfirst Century Management Services Limited has been reconstituted.

The reconstitution has been carried out consequent to the cessation of the earlier Presiding Officer and to ensure continued compliance with the provisions of the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* and the Company's Policy.

The reconstituted ICC, with effect from 01st April, 2026, is as follows:

Internal Complaints Committee

Name	Designation	Email ID	Role
Mr. Bhaskar Shetty	Chief Financial Officer	bhaskar@tcssdirect.com	Committee Member
Mrs. Jaylaxmi Kurri	Senior Manager – Accounts	jaya@tcssdirect.com	Committee Member

The above reconstitution is made, to ensure continues compliance with Company's policy and the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

All other provisions of the PoSH Policy remain unchanged.

For Twentyfirst Century Management Services Limited

Sd/-

Bhaskar Shetty

Chief Financial Officer

