PUKHRAJ ADDITIVES LLP

POSH & SEXUAL HARASSMENT PREVENTION POLICY

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1. Purpose

This policy aims to provide a safe, secure, and respectful work environment by preventing and addressing incidents of sexual harassment at the workplace in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. Scope

This policy applies to all employees, contract workers, trainees, consultants, visitors, and any person interacting with the company at any manufacturing unit, office, or work-related location.

3. Definition of sexual harassment

Sexual harassment includes any unwelcome act or behaviour, whether directly or by implication, such as:

- Physical contact or advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any unwelcome conduct of a sexual nature, verbal, physical, or non-verbal

4. Internal Committee (IC)

The company shall constitute an Internal Committee (IC) at each unit as per the POSH Act.

Structure:

- Presiding Officer: Senior female employee
- Two employee members (preferably with gender sensitivity experience)
- One external member (NGO/association experienced in women's rights)

Details of IC members will be published on notice boards and internal communication channels.

5. Complaint Procedure

1. Complaints must be made in writing within 3 months of the incident.
2. Complaint can be submitted to any IC member or via designated POSH email.
3. Assistance will be provided to complainants unable to write.
4. The IC will acknowledge and begin inquiry within 7 days.

6. Inquiry Process

- IC will conduct a fair, unbiased, confidential inquiry.
- Both parties will be given opportunities to present evidence.
- Inquiry to be completed within 90 days.
- Report submitted to employer within 10 days of completion.

7. Confidentiality

All information related to complaints, identities of parties involved, and proceedings shall remain strictly confidential as mandated by law.

8. Protection Against Retaliation

The company prohibits retaliation, victimization, or discrimination against any complainant, witness, or IC member participating in the inquiry.

9. Disciplinary Actions

Based on the IC's recommendations, disciplinary actions may include:

- Written apology
- Warning or reprimand
- Suspension
- Salary deduction
- Termination
- Counselling or training sessions

10. False Complaints

If a complaint is found to be malicious or intentionally false, the IC may recommend appropriate action against the complainant. However, inability to prove allegations does not constitute false complaints.

11. Awareness & Training

The company will conduct regular POSH awareness sessions for all employees and specialized training for IC members.

Posters and information will be displayed at conspicuous workplace locations.

Approved By



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