

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

1. Introduction

At [Company Name], our goal is to create a work environment in which all individuals are treated with dignity and respect and are free from all forms of discrimination and harassment. Prevention of Sexual Harassment Policy — you are trained on this policy which intends to prevent, prohibit and redress such incidents as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

2. Objective

- To establish the workplace safe for all employees.
- For the establishment of a redressal mechanism regarding complaints of sexual harassment.
- Building a culture of respect and inclusivity.

3. Scope

This policy applies to:

- All Workers (Permanent, Temporary, Contractual, and Trainees).
- All visitors, customers, suppliers and other third parties that work with [Company Name].
- Workplace venues, which include the company's premises, work-related events, and any location where the employee represents the organization.

4. Definition of Sexual Harassment

Sexual harassment is not limited to, but does include:

1. Physical touch and advances.
2. Access sexual favours; demand or request in a sexual manner.
3. Commenting with suggestive overtones.
4. Showing pornography.
5. Any unwanted physical conduct of a sexual nature, or verbal or non-verbal conduct of a sexual nature.

It also includes electronic harassment, such as emails, texts and social media.

5. Responsibilities of the Employer

- Provide a safe work environment.
- Make the POSH policy available to the public at all office locations.

- Establish **Internal Complaints Committee (ICC)** as per law.
- Notice: You are based on data until October 2023, Conduct regular awareness programs and training for employees.

6. Internal Complaints Committee (ICC)

- **Composition:**
 - Administering Oath: A senior woman employee.
 - Two members: Workers knowledgeable about women's rights and labor and anti-harassment laws.
 - One outside member: From an NGO or organization that works on such issues.
- **Responsibilities of the ICC:**
 1. Handle complaints of sexual harassment.
 2. Avoid the perceived biasing of investigation process.
 3. Prepare an annual report for the employer and district officer.

7. Complaint Procedure

1. **How to complain:** The aggrieved person has to file an application in writing to the ICC within three months from the date of the incident. This timeframe may be extended for good cause.
2. **Preliminary Review:** The ICC will conduct a preliminary review to ensure the complaint meets the criteria of the policy.
3. **Investigation Process:**
 - Within 90 days, we will conduct a fair and impartial investigation.
 - Both sides will have the chance to make their case.
4. **Action on Findings:** Based on the ICC's report, appropriate disciplinary actions will be taken which may include:
 - Written apology.
 - Warning or reprimand.
 - Termination of employment.

8. Confidentiality

- And the identity of the complainant, respondent and witnesses, as well as the proceedings and decisions, will be confidential.

9. Retaliation

- Retaliation against anyone who submits a complaint, or participates in an investigation, is also prohibited.

10. Awareness and Training

- [Company Name] will conduct workshops, seminars and training program from time to time to disseminate the POSH policy and the redressal mechanism.

11. Consequences of False Complaints

- False complaints made alleging misconduct will be treated as misconduct themselves and may result in further disciplinary action.

12. Amendments to the Policy

- This policy will be updated periodically in order to keep in the accordance with Legal Obligations and Organizational changes.

13. Contact Information

Employees can contact the ICC directly for assistance or to make a complaint at:

- Email: [icc_email@company.com]
- Phone: [+91 XXXXXXXXXX]
- Office Address: [Company Address]

This new policy helps make clear to all [Company Name] employees that we are dedicated to building and maintaining a workplace that is safe, respectful, and inclusive for all.