

Prevention of Sexual Harassment at Workplace (POSH) Policy

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1. Objective:

Sheela Foam Ltd (“The Company”) believes that respectful, professional conduct furthers the Company’s mission, promotes productivity, minimizes disputes, and enhances its reputation. The Company expects every employee to show respect for all of our colleagues, customers, and vendors and constitutes a workplace without any discrimination as to, in particular, race, colour, religion, age, gender, sexual orientation, or social origin. Harassment by co-workers, supervisors, or any third parties is a form of misconduct that destroys the work environment and undermines the integrity of the employment relationship. The Company is committed to providing a work environment that is free of unlawful discrimination, including harassment that is based on any legally protected status. Thus the Company hereby, in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, has framed this Policy for Prevention of Sexual Harassment of Women at Workplace.

The objective of the policy is:

- 1.1 To provide its women employee a workplace free from harassment and ensure protection against sexual harassment at the workplace;
- 1.2 To provide the prevention and redressal of complaints of sexual harassment at work place;
- 1.3 The company is committed to providing all its employees with an environment free from sexual harassment. The Company has zero tolerance for harassment, intimidation or humiliation of a sexual nature in its workplace and is dedicated to ensuring the enactment, observance, and adherence of guidelines and best practices that prevent and prosecute acts of sexual harassment.

Accordingly, this document will be a policy against sexual harassment in the company shall be governed by the provisions of the said Act, amongst others, which covers the following as well:

Key terms

1. Meaning of Sexual Harassment
2. Constitution of IC (Internal Committee)
3. Reporting a complaint
4. Enquiry into complaint
5. Duties of employer(s)

2. Scope:

The policy shall be applicable to all Employees of the Company employed at a workplace for any work on regular, temporary, ad hoc or daily wages basis, workmen, probationer, trainee, apprentice and employee on contract at its workplace or at client sites. This policy shall apply at any place that constitutes “Workplace” as defined hereunder.

The “**Workplace**” includes:

- 2.1 All plants, branch offices, commercial offices, head office, service centers or other premises where the Company’s business is conducted.
- 2.2 All company-related activities performed at any other site away from the Company’s premises.
- 2.3 Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

3. What is Sexual Harassment?

Sexual Harassment is a form of discrimination and includes unwelcome sexually determined behavior (directly/implies). It includes a range of behaviors from seemingly mild transgressions and annoyances to actual sexual abuse or sexual assault.

Sexual Harassment consists of physical conduct & advances, demand or request for sexual favors, sexually colored remarks, showing pornography or any other unwelcome physical, verbal or non verbal conduct of a sexual nature.

Any conduct that interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment, including:

- 3.1 physical contact and advances;
- 3.2 a demand or request for sexual favors;
- 3.3 making sexually colored remarks, or remarks of a sexual nature about a person's clothing or body;
- 3.4 showing pornography, making or posting sexual pranks through Email, SMS, WhatsApp, Instagram, Facebook, or any other digital platform, sexual teasing and jokes, sexually demeaning or offensive pictures.
- 3.5 repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest against a person's wishes;
- 3.6 giving gifts or leaving objects that are sexually suggestive;
- 3.7 eve-teasing, innuendos, and taunts, physical confinement against one's will, or any such act likely to intrude upon one's privacy;
- 3.8 persistent watching, following, or contacting of a person; or
- 3.9 any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

4. Definition Of Certain Terms Used In This Document:

- 4.1 "Aggrieved Woman" means in relation to a workplace, a woman, of any age whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent.
- 4.2 "Accused/Respondent" means a person against whom the Aggrieved Woman has made a complaint as per the relevant provisions of the Act.
- 4.3 "Authorised Person" means the person authorised by the Company to handle complaints of Sexual Harassment.
- 4.4 "Internal Committee" shall mean the Internal Complaints Committee constituted by the Company as per the act.
- 4.5 "Employee" means a person employed at the Company for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent including a contractor, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment of such an employee are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- 4.6 "Service Rules" means the terms and conditions of employment at SHEELA FOAM LTD. laid down by the Company from time to time

5. Complaints Channel:

All complaints must be received in writing, either in English or the vernacular language. The complainant is required to give the complaint in writing to the ICC Presiding Officer at the following email address- posh.complaint@sheelafoam.com

6. Internal Complaints Committee (ICC)

The Company has constituted an 'Internal Complaints Committee' for redressal of sexual harassment complaint(s) in accordance with the provisions of the Act.

6.1 In accordance with the provisions of the said Act, the Internal Complaints Committee will comprise of the following:

6.1.1 **Presiding Officer** - who shall be a woman employed at a senior level from amongst the employees.

6.1.2 **Minimum two members** - from employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge.

6.1.3 **One external member** - from non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

Provided that at least one-half of the total members so nominated shall be women. IC members along with the Presiding officer shall hold office for a period, not exceeding three years, from the date of their nomination. However, few members, if willing, can continue their membership to help evolve and guide the new members.

The Presiding Officer or any Member of the IC may be removed before the expiry of his/her term under the provisions of the Act.

6.2 The Internal Complaints Committee is responsible for:

6.2.1 Investigating every formal written complaint of sexual harassment.

6.2.2 Taking appropriate remedial measures to respond to any sustained allegations of sexual harassment.

6.2.3 Discouraging and preventing employment related sexual harassment.

6.2.4 Disseminate procedural & functional knowledge among IC in areas of investigation & report writing.

6.2.5 Create & maintain a uniform system of the central repository of investigation reports & documents.

6.2.6 Ensure compliance with regulatory norms by keeping track of any amendments to the policy and updating it periodically.

6.2.7 Submit an annual reports to the Company by summarizing cases and action taken, in such form and at such time as may be prescribed under the said act.

7. Sheela Group Internal Complaints Committee

Kindly refer to Annexure – I for the ICC Members list.

8. Procedures For Resolution, Settlement Or Prosecution Of Acts Of Sexual Harassment:

8.1 An employee shall make the complaint within seven (7) days of the incident to the POSH Committee. However, in case she is not able to file the complaint within the prescribed timeline, a leave may be granted to file the same within three (03) months of filing the complaint with the ICC.

Note: In case the aggrieved woman for any other reason, is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with her written consent.

8.2 On the receipt of the complaint, the same shall be resolved as follows:

a. Conciliation

The Internal Complaints Committee may, before initiating an inquiry, and at the request of the Aggrieved Woman, take steps to settle the matter between her and the respondent through conciliation. When the settlement has arrived, the Internal Complaints Committee shall record the settlement so arrived and forward the same to the Company to take action as specified in the recommendation. The Parties shall be provided with a copy of the settlement, and no further inquiry shall be conducted. Provided that no monetary settlement shall be made as a basis of conciliation.

b. Resolution through Complaint

The Aggrieved woman has the option of filing a formal written complaint to the ICC if the complainant is not comfortable with the conciliation option or has exhausted such option if the matter is not resolved to their satisfaction. The following steps will be adopted in case a complaint is to be filed:

Step 1 - Prepare the complete case, capture all events, facts, and proofs and shall submit six copies of the complaint along with supporting documents and the names and addresses of the witnesses to the ICC.

Step 2 - The IC shall give every reasonable opportunity to the Complainant and the Accused to put forward and defend their respective cases and to ensure that the complainant and the respondent have full opportunity to present their claims, witnesses, and evidence which may establish or substantiate their claims and One copy of the complaint to be submitted to the Accused and the Accused have (10) days to respond to the complaint with complete details i.e. name/contact no

/address of the witness, proof etc.

Step 3 – If the Complainant or the Accused fails, without sufficient cause, to be present before the ICC for three (3) consecutive hearings, the ICC will issue a notice of fifteen (15) days to the concerned party before terminating the inquiry proceedings or giving an ex-parte decision on the complaint.

Step 4 - All the proceedings of the ICC will be summarized by the Committee. If either the Complainant or the Accused is desirous of submitting a statement in writing or reviewing the summary of discussion prepared by the ICC, such statement shall be endorsed by such Party in token of authenticity thereof and submitted to the Committee.

Step 5 - The Committee is required to complete the inquiry within a time period of ninety (90) days from the date on which the written complaint is received.

Step 6 - Basis of the report and findings, ICC shall complete the inquiry and make a report of its findings on the Complaint and its recommendations to the Corporate ICC within a period of ten (10) days from the conclusion of the inquiry procedure set out above. The report of the ICC shall also include recommendations for the imposition of any penalty and the reasons for such recommendations to the Corporate ICC.

Step 7 - Corporate ICC, Give recommendations and take an appropriate non-biased action against the Accused.

c. Appeal

Any person aggrieved from the recommendation made to the ICC or non-implementation of such recommendations may prefer an appeal to the court or tribunal in accordance with the Service Rules applicable to the said person within a period of ninety days of the recommendations.

9. Punishment For Sexual Harassment

Penalties: All acts of sexual harassment will be treated as misconduct and attract appropriate penal consequences. Such consequences may include any of the following, or a combination of the below mentioned statutory actions:

1. Written apology;
2. Warning;
3. Reprimand or censure;
4. Withholding of promotion;
5. Withholding of pay rise or increments;
6. Termination of employment;
7. Counselling session; or
8. Carrying out community service

10. Punishment For False Or Malicious Complaint And False Evidence

In case the complaint or any evidence submitted by the complainant is found to be false, the complainant shall, if deemed fit, be liable for appropriate disciplinary action by the ICC/Management in accordance with the provisions of the Service Rules applicable to her or him.

11. Confidentiality

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the complainant, the accused person, and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

12. Timelines

Submission of complaint (in written form)	Within 3 months of the occurrence of the last incident
Notice to the respondent	Within 7 days of receipt of such complaint
Respondent to respond to the complaint in writing	Within 10 days from the receipt of information regarding complaint from the internal committee
Completion of Inquiry	Within 90 days from receipt of complaint
Submission of report to district officer/ employer as the case may be	Within 10 days from completion of inquiry
Implementation of Recommendations	Within 60 days from receipt of the report
Appeal	Within 90 days of the recommendations

13. Complaint(S) By A Male Employee

To the extent not repugnant to the context or meaning thereof, the provisions of the Policy or the Act with necessary adaptation like gender etc. shall apply mutatis-mutandis to the male complainant(s).

14. Policy Owner

The Human Resources Department – HR may be contacted for any queries / Suggestions at email address: posh.complaint@sheelafoam.com

15. Conclusion

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Disclaimer: The Management reserves the right to alter, modify, change or withdraw this Policy either in part or in full at any given point in time at its sole discretion.

ANNEXURE-I

S.NO	NAME	DESIGNATION	POSITION IN COMMITTEE	CONTACT NUMBER	MAIL-ID
1	Ms.Charu Bhargava	SVP- IT	Presiding Officer	9818073375	charu@sheelafoam.com
2	Dr. Renu Chopra	Ngo-Managing Trustee (Prayatn)	External Member	9312283533	renuchopra1956@gmail.com
3	Mr. Amit Kumar Gupta	Group CFO	Member	9910160773	amit.gupta@sheelafoam.com
4	Mr. Puneet Gulati	CMO	Member	9717993514	puneet.gulati@sheelafoam.com
5	Ms. Kiran Jyoti Shankar	VP-L & D	Member	9818499979	kiranjyoti.shankar@sheelafoam.com

ANNEXURE -II

Template of MOM

<Title>

Minutes of Meeting

Date:

Venue:

Attendees:

Absentees:

Chairperson:

Discussion	By	Action Item	Responsibility	Timelines