

# **POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH) – (Effective Date of Revised Policy: 2<sup>nd</sup> January, 2021)**

**Oriental Trimex Limited**

---

## **1. Purpose**

Oriental Trimex Limited (“the Company”) is committed to providing a safe, secure and dignified work environment free from sexual harassment.

This Policy is framed in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the rules made thereunder.

---

## **2. Scope & Applicability**

This policy applies to:

- All employees (permanent, temporary, contractual, trainees, apprentices)
  - Directors and management
  - Consultants, vendors, contractors
  - Visitors and customers
  - All workplaces of the Company including factories, offices, sites and any place visited during the course of employment
- 

## **3. Definition of Sexual Harassment**

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

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

Sexual harassment may occur at:



- Workplace
- Business meetings
- Training programs
- Transportation provided by the Company
- Off-site locations connected with work

---

## 4. Prevention of Sexual Harassment

The Company shall:

- Create awareness among employees regarding this policy
- Display POSH notices at prominent locations
- Conduct periodic training and sensitization programs
- Ensure a respectful and inclusive work culture

---

## 5. Internal Complaints Committee (ICC)

The Company shall constitute an **Internal Complaints Committee (ICC)** as per the Act, consisting of:

- A Presiding Officer (senior woman employee)
- At least two employee members
- One external member from an NGO or legal background
- At least 50% women members

The ICC shall function independently and confidentially.

---

## 6. Complaint Redressal Mechanism

### 6.1 Filing of Complaint

- An aggrieved woman may file a written complaint within **3 months** from the date of incident
- Extension may be granted by ICC for valid reasons
- Assistance shall be provided if the complainant is unable to write the complaint

### 6.2 Inquiry Process

- ICC shall conduct a fair and impartial inquiry
- Both parties shall be given opportunity to be heard
- Inquiry shall be completed within **90 days**



## **7. Confidentiality**

- Identity of the complainant, respondent and witnesses shall be kept strictly confidential
- Breach of confidentiality shall invite disciplinary action

## **8. Interim Relief**

During the pendency of inquiry, ICC may recommend:

- Transfer of either party
- Grant of leave to the aggrieved woman
- Any other appropriate relief

## **9. Action Against Misconduct**

If allegations are proved, ICC may recommend:

- Written apology
- Warning or reprimand
- Suspension or termination
- Deduction from salary as compensation
- Any other disciplinary action as per company rules

## **10. False or Malicious Complaints**

- Malicious or knowingly false complaints may attract disciplinary action
- Mere inability to prove a complaint does not mean false complaint

## **11. Protection Against Retaliation**

The Company strictly prohibits retaliation against:

- Complainant
- Witnesses
- ICC members



Any retaliation shall be treated as misconduct.

## 12. Awareness & Training

The Company shall:

- Conduct POSH awareness programs
- Educate employees about rights and responsibilities
- Ensure managers are trained to handle complaints sensitively

## 13. Reporting & Compliance

- ICC shall submit an annual report to the employer
- Employer shall include POSH compliance in annual filings as applicable

## 14. Penalty for Non-Compliance

Non-compliance with this policy or the Act shall result in disciplinary action and may also attract penalties under law.

## 15. Policy Review & Amendment

- This policy shall be reviewed periodically
- Amendments shall be made as per changes in law
- Board approval shall be required for modifications

For Oriental Trimex Limited

