

1. OBJECTIVE:

The purpose of POSH at Lotus Technicals Pvt. Ltd. is to protect women at the workplace against sexual harassment and all forms of discrimination, and to also prevent and redress complaints of sexual harassment received and matters related to it or incidents thereto. This is to create and maintain a safe work environment for all female employees as per the guidelines under the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013."

2. ELIGIBILITY:

This policy extends to all the employees of Lotus Technicals Pvt. Ltd., including any other individual-coming to the workplace for employment or for any other purpose whatsoever, including but not limited to visitors, vendors, and contractual resources, and applies to any alleged act of sexual harassment against person(s) at the workplace, whether the incident has occurred during or beyond office hours within the precinct of the establishment.

3. GENERAL GUIDELINES:

Sexual harassment shall include, but is not limited to:

- a. Physical contact and sexual advances.
- b. Demand or request for sexual favours.
- c. Sexually coloured remarks.
- d. Showing pornography.
- e. Any other unwelcome physical, verbal, or non-verbal, or written conduct of a sexual nature.
- f. Unwanted or persistent requests to go out and ask intrusive questions about others' private lives.

4. DEFINITION:

4.1 Workplace includes all places where the work of Lotus Technicals Pvt. Ltd. is carried out. It shall include:

- a. All offices or other premises where the company's business is conducted.
- b. All company-related activities performed at any other site away from the company's premises.
- c. Any social, business, or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.
- d. Any place visited by the employee arising out of or during the course of her employment, including the transport services provided by the company for undertaking such journeys and guest houses of the company.
- e. Any social networking website during or outside of office hours.

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

- a. Any unwelcome sexually determined behaviour or pattern of conduct that would cause discomfort and/or humiliate a person at whom the behaviour or conduct was directed, namely:
 - i. Physical contact and advances.
 - ii. Demand or request for sexual favours.
 - iii. Not limited to cat calls, wolf or finger whistles, vulgar or indecent jokes, letters, phone calls, text messages, emails, gestures, etc.

Sexual harassment can involve a series of incidents or it can be a one-off occurrence.

- b. The following circumstances, among others, if they occur or are present in relation to any sexually determined act or behaviour amount to sexual harassment:
 - i. Implied or explicit promise of preferential treatment in employment; or implied or explicit threat of detrimental treatment in employment; or
 - ii. Implied or explicit threat about the present or future employment status; or
 - iii. Interference with work or creating an intimidating, offensive, or hostile work environment for the person; or –
 - iv. Humiliating treatment affecting any person's health or safety.

4.3 **An aggrieved woman** in relation to a workplace is a woman of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

4.4 **A complainant** is any aggrieved woman who makes a complaint alleging sexual harassment under this policy.

4.5 **Respondent** is the employee against whom a complaint of sexual harassment has been made by the aggrieved woman.

4.6 **An employee** is a person employed at a workplace for any work on a regular, temporary, *ad hoc*, or daily wage basis, either directly or through an agent, including a contractor, with or without a voluntary basis or otherwise, whether the terms of employment are express or implied, and includes a co-worker, a contract worker, a probationer, a trainee, an apprentice, or anyone called by any other such name.

4.7 **Employer** means the person responsible for the management, supervision, and control of the workplace.

5. INTERNAL COMPLAINTS COMMITTEE (ICC):

5.1 Each complaint of Sexual Harassment shall be dealt with the utmost confidentiality and urgency by an internal committee consisting of:

- a. **Presiding Officer:** _____ (woman employed at a sr. level in the organization)
- b. 1 Member, Head of Department
- c. 1 Lady Member (Manager)
- d. 1 Lady Member
- e. 1 External Member (from an NGO or psychologist, or lawyer)

5.2 Tenure

- a. The presiding officer and every other member of the Internal Complaint Committee shall hold office for a period not exceeding 3 years.
- b. Changes in the constitution of the Internal Complaint Committee, whenever necessary, shall be made as expeditiously as possible and, in any case, within 15 days of the date of the vacancy of office by one of the members.

6. GRIEVANCE MECHANISM:

5.1 Procedure to register complaints.

- a. A complaint shall be submitted through email to hr@lotustechnicals.com or can be discussed during the meeting with any member of the Internal Committee mentioned herein within 3 months of the occurrence of an act of sexual harassment.

- b. If the respondent is a direct supervisor of the complainant or a person influencing the career growth of the complainant, the reporting structure will be changed until the time the inquiry is completed.

5.2 Conciliation

- a. Once the complaint is received, before initiating the inquiry, the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman.
- b. It is made clear to all parties that conciliation does not necessarily mean acceptance of the complaint by the respondent. It is a practical mechanism through which issues are resolved, or misunderstandings are cleared.
- c. In case a settlement is arrived at, the committee records and reports the same to the employer for taking appropriate action. Resolution through conciliation happens within 2 weeks of the receipt of the complaint.
- d. The committee provides copies of the settlement to the complainant and respondent. Once the action is implemented, no further inquiry will be conducted.

5.3 Conducting Inquiry

- a. The committee initiates an inquiry in the following cases:
 - i. No conciliation is requested by an aggrieved woman.
 - ii. Conciliation has not resulted in a settlement.
 - iii. The Complainant informs the committee that any term or condition of the settlement arrived through conciliation has not been complied with, by the respondent.
- b. Within 3 working days, the internal committee shall commence the official internal inquiry by:
 - i. By informing the said complaint to the respondent.
 - ii. By instructing to stop the alleged act of sexual harassment immediately.
 - iii. By informing them not to reach out to the complainant directly or indirectly.
 - iv. By asking for an immediate explanation from him or her on the same.

- c. Within a period of 5 working days from the receipt of the original complaint, the designated person shall respond in writing to the complainant informing him or her about the initial steps taken by the Internal Committee in order to stop the alleged act(s).
- d. Within a period of 15 days from receipt of the complaint, the internal committee shall record and accordingly communicate in writing to the complainant and the respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact-finding, truth-verification, and counselling sessions with persons involved in the alleged act(s).
- e. A complaint will be closed not later than one month from receipt of the complaint by recording the decisions of the Internal Committee and, accordingly, informing the complainant and the respondent of the same.
- f. Employees are duty-bound to assist in investigative steps; employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation, or hostility.
- g. Within 2 working days from receipt of the prima facie findings or the charges, if the complainant or the respondent is dissatisfied with the decision of the Internal Committee, she or he may appeal, specifying the reasons in writing, to the Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of the Managing Director is final and cannot be appealed.

7. REDRESSAL:

- a. An amicable resolution of the complaint is possible only with the written consent of the complainant.
- b. Within 24 hours of closing the case file, the Internal Committee shall present the same to and inform the Managing Director about its decision.
- c. In case of a decision establishing the offence of sexual harassment by the complainant, within 3 working days, the Internal Committee shall recommend disciplinary action against the offender,

considering the nature and extent of injury caused to the complainant, prior complaints, repetition of the offence, etc., and the impact of the offence on the company profile as a whole.

d. The position of the offender and the criticality of the position occupied by the offender shall not be a hindrance to the disciplinary action taken against the offender.

e. The disciplinary action that shall be commensurate with the nature of the gravity of the offence shall include, but not be limited to,

- i. Warning.
- ii. Written apology from the offender.
- iii. Bond of good behaviour.
- iv. Transfer.
- v. Debarring from supervisory duties.
- vi. Denial of employee benefits like increments, promotions, salary corrections, etc.
- vii. Cancellation of a specific work assignment.
- viii. Suspension.
- ix. Dismissal.

An annual report summarising complaints and redressal of sexual harassment shall be prepared by the designated person. The said report as well as all documents regarding sexual harassment complaints shall be in the custody of the designated person and will be termed 'Strictly Confidential.'



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Version-3

**PREVENTION OF SEXUAL HARASSMENT (POSH)
POLICY FOR WOMEN**

HR
31.12.2024

ANNEXURE A

Internal Complaints Committee	
1.	Presiding Officer – Ms. Seema Varma (Assistant Manager - Accounts)
2.	Member - Mrs. Pooja Yardi (Sr. Executive - HR)
3.	Member – Mrs. Shubhangi Pingle (Assistant Manager - Utility)
4.	Member - Ms. Gauri Meher (Executive - HR)
5.	Member – Mrs. Poonam Suke (Principal Designer-3D)
6.	External Member – Dr. Dashrath Shridhar Hatle (Advocate)