



POSH (Prevention Of Sexual Harassment)

1. Objective

This policy is intended to create a workplace free from sexual harassment, ensure a safe and respectful work environment, and establish effective procedures for prevention, reporting, and redressal of sexual harassment complaints.

2. Scope

This policy applies to:

- All employees of SUPL (permanent, contractual, interns, trainees, consultants)
- Any person visiting SUPL premises or engaged in SUPL-related activities
- Incidents occurring in physical or digital workplaces, during business travel, training, or off-site meetings

3. Definition of Sexual Harassment

As per the POSH Act, sexual harassment includes any one or more of the following unwelcome acts or behavior:

- Physical contact and advances
- Demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

It also includes:

- Implied or explicit promises of preferential treatment or threats
- Creating an intimidating, hostile, or offensive work environment
- Interference with work performance

4. Policy Statement

SUPL adopts a **zero-tolerance** approach to sexual harassment and is fully committed to:

- Preventing all forms of sexual harassment
- Providing mechanisms for redressal
- Ensuring no retaliation against complainants or witnesses
- Educating employees about workplace conduct and their rights

5. Internal Committee (IC)

SUPL has constituted an **Internal Committee** in accordance with the Act.

Composition:

- Presiding Officer: Senior woman employee
- Two employee members (committed to gender sensitivity)
- One external member (experienced in social work or law)

Contact details of the IC are prominently displayed at all SUPL locations and in employee handbooks.

6. Complaint Mechanism

- Complaints must be filed **within 3 months** of the incident (extendable under special circumstances)
- Complaints can be made in writing to:
✉ supl@shraddhagroups.com or submitted in person to the **Presiding Officer** of the IC
- Anonymous complaints are not encouraged, but complainants' identity will remain confidential

7. Redressal Process

1. **Acknowledgment** of the complaint
2. **Initial inquiry** by the IC within 7 working days
3. **Formal investigation** through fair hearing of both parties and any witnesses
4. **Completion within 90 days**, with a final report submitted to the employer
5. **Action based on findings**, which may include warning, suspension, termination, or legal action

8. Rights and Protection

- **Confidentiality** of all complaints and proceedings will be strictly maintained
- The complainant, respondent, and witnesses are protected from any form of retaliation
- **Support mechanisms** such as counselling and work adjustments may be provided

9. Malicious Complaints

If any complaint is found to be malicious or intentionally false, disciplinary action may be taken against the complainant. However, inability to substantiate a complaint does not imply malice.

10. Training and Awareness

- POSH awareness sessions will be conducted **annually**
- New hires will be sensitized during onboarding

- POSH policy will be shared in employee handbooks and intranet

11. Recordkeeping and Reporting

- The IC shall maintain records of all complaints and actions taken
- An annual report will be submitted to the District Officer as per statutory requirement

12. Policy Review

This policy shall be reviewed **annually** or as required to reflect changes in law or internal feedback.