



PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE POLICY

REF : CEV/Policy/POSH

ISSUE : A/02.01.2024

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1. Policy Statement

CEV Engineering Pvt. Ltd. ("the Company") is committed to providing a safe, secure, and respectful work environment that upholds dignity and equality for all employees, irrespective of their gender. The Company adopts a **zero-tolerance approach to sexual and any type of harassment** and is dedicated to prevention, prohibition, and redressal of harassment at the workplace.

2. Objectives

- To prevent sexual harassment at the workplace.
- To provide an effective grievance redressal mechanism.
- To create awareness among employees about what constitutes sexual harassment.
- To ensure compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules framed thereunder.

3. Scope

This Policy is applicable to:

- All employees (permanent, temporary, probationers, trainees, interns, consultants, contractual staff).
- Any third party visiting the premises, including clients, vendors, suppliers, service providers.
- Incidents occurring at workplace premises, company events, off-site assignments, training, travel, or via electronic communication that are work-related.

4. Definition of Sexual Harassment

As per Section 2(n) of the POSH Act, sexual harassment includes one or more of the following unwelcome acts or behaviour (whether directly or by implication):

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

Examples include (but are not limited to):

- Inappropriate touching, patting, or pinching.
- Sending or displaying obscene or offensive messages, emails, images, screensavers.
- Unwanted remarks about appearance, clothing or body.
- Repeated invitations for dates or personal meetings outside work despite refusal.
- Spreading rumours or jokes with sexual overtones.
- Stalking or following an employee inside or outside office premises.
- Any quid pro quo: e.g., implied threats of adverse employment action if sexual favours are refused or promises of favourable treatment if accepted.

5. Roles and Responsibilities

5.1 Employer / Management

- Ensure a safe working environment.
- Constitute the Internal Complaints Committee (ICC) as per Section 4 of the Act.
- Display conspicuously at the workplace the penal consequences of sexual harassment and details of the ICC.
- Organise regular workshops, training and awareness programmes.



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5.2 Internal Complaints Committee (ICC)

- Receive complaints of sexual harassment.
- Conduct fair and impartial inquiries.
- Recommend actions to the employer.
- Submit annual reports as per the law.

5.3 Employees

- Refrain from any conduct that amounts to sexual harassment.
- Report incidents of sexual harassment immediately to ICC.
- Cooperate during inquiries.

6. Constitution of Internal Complaints Committee (ICC)

Designation	Details
Presiding Officer	A senior management/MD
Employee Members	At least 2 employees with commitment to women's issues / social work / legal knowledge
External Member	From NGO or association committed to cause of women / familiar with sexual harassment issues

- At least 50% of ICC members shall be women.
- ICC tenure is 3 years.

7. Complaint Mechanism

7.1 Filing of Complaint

- Any aggrieved woman may make a written complaint of sexual harassment to the ICC within **3 months of the incident**.
- In case of a series of incidents, within **3 months of the last incident**.
- The ICC may extend the time limit by another **3 months** if it is satisfied that there were circumstances preventing filing.

Complaint format

Should include:

- Name and contact of the complainant.
- Name and details of the respondent.
- Description of the incident(s) with date, time, location.
- Supporting evidence, if any (emails, messages, photos).
- Names of witnesses, if any.

7.2 Assistance

If the complainant is unable to make a complaint in writing, the ICC shall render all reasonable assistance.

7.3 Complaint by Others

In case the complainant is unable to complain due to physical/mental incapacity, legal heir or any other person prescribed under the Act can file the complaint.



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8. Redressal Process

8.1 Conciliation

- On receipt of complaint, before initiating inquiry, the ICC **may, at the request of the aggrieved woman**, attempt conciliation.
- No monetary settlement shall be made as a basis of conciliation.
- If settlement arrived at, ICC shall record and forward to employer for action. Copies to both parties.

8.2 Inquiry Procedure

- If conciliation not opted or fails, ICC conducts formal inquiry:
 - Send copy of complaint to respondent within **7 days**.
 - Obtain written response from respondent within **10 days**.
- Both parties shall be given opportunity to present their case, evidence, and witnesses.

8.3 Timelines

- Inquiry to be completed within **90 days**.
- ICC to prepare a report with recommendations and submit to employer within **10 days of completion**.
- Employer to act on recommendations within **60 days**.

8.4 Principles of Natural Justice

- Equal opportunity for both parties to be heard.
- Right to cross-examine witnesses (through ICC).
- Maintain confidentiality.

9. Possible Recommendations by ICC

Depending on gravity, ICC may recommend:

- Written apology.
- Warning or reprimand.
- Withholding promotion, increment, or bonus.
- Transfer.
- Termination.
- Counselling sessions.
- Community service.

If the complaint is found to be **malicious or false**, the ICC may recommend action against the complainant, after giving an opportunity of being heard.

10. Protection & Confidentiality

- Identity of the complainant, respondent, witnesses, contents of complaint, inquiry proceedings and recommendations shall be **strictly confidential**.
- Disclosure is limited to ICC, employer, and legal authorities if required.

11. Retaliation

- The Company prohibits any form of retaliation against employees for reporting sexual harassment or participating in inquiry.
- Any retaliation will be subject to disciplinary action.



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12. Remediation Procedure for Victims

To ensure victim protection, support, and fair resolution, the following measures will be taken:

12.1 Immediate Support

- Ensure the complainant's safety within the workplace.
- Provide access to counseling/psychological support and medical assistance, if required.
- Grant leave up to **3 months**, or transfer to another department/location if requested.
- Ensure no retaliation, victimization, or adverse action is taken against the complainant.

12.2 During Investigation

- Maintain confidentiality of complainant, witnesses, and proceedings.
- Allow representation during inquiry if needed.
- Ensure fair treatment and protection from intimidation.

12.3 Post-Remediation Corrective Measures

If the complaint is upheld by IC:

- Written apology, warning, or reprimand to the offender.
- Deduction from salary, suspension, or termination depending on severity.
- Mandatory behavioral/counseling sessions for the offender.
- Restitution to the complainant if career/financial loss occurred.
- Awareness training for team/department to prevent recurrence.

12.4 Follow-up Support

- HR/IC will monitor the workplace environment post-closure for at least 1 months.
- Regular check-ins with complainant to ensure no further harassment or retaliation.

13. False / Malicious Complaints

- If the ICC concludes that the complaint was made with malicious intent or knowing it to be false, ICC may recommend suitable disciplinary action against the complainant.

14. Awareness & Capacity Building

- Annual awareness programmes and orientation for employees.
- ICC members shall receive specialized training.
- Policy and details of ICC shall be displayed on notice boards.

15. Record Keeping & Reporting

- ICC shall maintain:
 - Records of complaints received.
 - Inquiry proceedings and findings.
 - Action taken.
- Submit annual report to the District Officer under the Act with:
 - Number of complaints received.
 - Number disposed of.
 - Number pending more than 90 days.
 - Nature of action taken.



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16 Awareness & Training

- All employees will undergo mandatory POSH awareness training at induction and refresher sessions annually.
- Contractors, suppliers, and third parties will also be sensitized.
- Posters/notices with IC details will be displayed prominently.

17. Monitoring & Reporting

- ICC will submit an annual compliance report to management and the District Officer as per the POSH Act.
- Policy will be reviewed annually to ensure continued effectiveness.

18. Conclusion

The Company is committed to fostering a safe work environment free from sexual harassment. All employees are expected to uphold this commitment by maintaining decorum, mutual respect, and integrity in all workplace interactions.

Young Jin Kim

Managing Director

Effective Date: 02.01.2024