

## **Sulabh Engineers and Services Limited**

# **Prevention of Sexual Harassment (POSH) Policy**

### 1. Objective

This policy is intended to prevent and prohibit sexual harassment at the workplace and provide a safe, secure, and respectful environment for all employees, regardless of gender. The policy aims to ensure fair, prompt, and confidential resolution of complaints related to sexual harassment.

### 2. Scope

This policy applies to all employees of the company, including full-time, part-time, temporary, contractual, interns, consultants, and third parties associated with the organization. It is applicable at all Company workplaces, and also to any place visited by the employee arising out of or during the course of employment, including transportation provided by the employer.

#### 3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome sexually motivated behaviour, whether directly or indirectly, that creates an intimidating, hostile, or offensive work environment. Such behaviour includes but is not limited to:

- 1. Physical contact and advances
- 2. A demand or request for sexual favours
- 3. Sexually coloured remarks
- 4. Showing pornography or sexually explicit content (including writing, emails, SMSs, or messages on social media)
- 5. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Sexual harassment may also occur if:

- The behaviour creates an intimidating, hostile or offensive work environment.
- Refusal to consent to such conduct may result in adverse consequences for the victim.

### 4. Complaint Mechanism

## Filing a Complaint:

- Complaints must be made in writing to the company.
- The complaint may be filed by the aggrieved person or someone else on their behalf with proper authorization.



### 5. Disciplinary Action

If the company concludes that sexual harassment has occurred, the Company shall take appropriate disciplinary action, which may include:

- Warning or reprimand
- Withholding promotion or salary increment
- Suspension
- Termination of employment

False or malicious complaints will also be subject to disciplinary action, provided it is proven that the complaint was made with malicious intent.

### 6. Protection Against victimization

The Company ensures that the complainant, witnesses, and others involved in the investigation are protected from retaliation or victimization. Any such action will be treated as misconduct and dealt with accordingly.

### 7. Confidentiality

All complaints, proceedings, and records shall be kept confidential by the ICC and all involved parties. Disclosure may be made only when necessary for the investigation, or as required by law.

### 8. Conclusion

Sulabh Engineers and Services Limited is committed to upholding a workplace culture of respect, dignity, and no tolerance toward sexual harassment. All employees are expected to contribute to this environment by maintaining professional conduct.

Date: 05/07/2025