



**Heritage Finlease Limited**

**Woman Employee Protection & Sexual Harassment,  
Prevention (POSH) Policy**

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**WOMAN EMPLOYEE PROTECTION & SEXUAL HARASAMENT, PREVENTION  
POLICY**

**1. Preamble:**

In December 1993, as part of a campaign against sexual harassment in Rajasthan, some groups had filed a petition in the Supreme Court of India, under the name of 'Vishaka', asking the Court of Law to give certain directions regarding the sexual harassment that women face at the workplace. The result is the Supreme Court judgment, which came on 13th August 1997, and gave the Vishaka guidelines.

On 23rd April 2013, the legislature brought into force a comprehensive legislation dealing with the protection of women against sexual harassment at workplace by enacting “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013”.

**2. Objective:**

The Company is committed to provide a place of work, free from sexual harassment, intimidation, or exploitation. The company maintains a zero-tolerance policy for workplace sexual harassment, taking all incidents seriously and promptly investigating all allegations. Company is committed to take all necessary steps in ensuring that its staff works in a safe and respectful environment that is conducive to their professional growth and promotes equality of opportunity.

**3. Scope:**

This is applicable to all employees in the organization, including any gender, part-time employees or on contract or service providers deployed on the premises. The policy covers such acts occurred within the premises of the organisation or deemed premises which are within the organisation’s control.

**4. Definitions of Sexual Harassment:**

- a. Unwelcome sexual advances, requests or demand for sexual favours, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
- b. Unwelcome sexual advances involving verbal, non-verbal or physical conduct such as sexually coloured remark, jokes, letters, phone calls, email, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking sounds, display of pictures, signs, verbal or non-verbal communication which offends the individuals sensibilities and affect the performance of the individual;
- c. Eve-teasing, innuendos and taunts, physical confinement against one’s will and likely to intrude upon one’s privacy;
- d. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
- e. Conduct of such an act at workplace or outside in relation to an employee or vice-versa during the course of employment; and
- f. Any unwelcome gesture by an employee having sexual overtones.

**5. Internal Complaints Committee**

An Internal Complaints Committee (ICC) has been constituted by the company to consider and redress complaints of Sexual Harassment. The Internal Complaints Committee is constituted with four members and it consists of one female member, one male member, one external member and is headed by a female employee as presiding officer.

The Presiding Officer and the members of the committee are furnished in the Annexure-1. If any member or presiding officer exits from the company new member / presiding officer will be appointed in their place and changes will be furnished in the Annexure-1 on time-to-time basis.

#### **6. Redressal Procedures:**

- Any employee who feels and is being sexually harassed directly or indirectly may submit a complaint of the alleged incident to any member of the ICC in writing with his/her signature within three months from the date of occurrence of incident.
- The ICC will maintain a register to endorse the complaint received by it and keep the content confidential, if it is so desired, except to use the same for discreet investigation.
- The ICC will hold a meeting with the Complainant within 7 days of the receipt of the complaint.
- At the first meeting, the ICC members shall hear the Complainant and record his/her allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material etc., to substantiate his/her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a chosen committee member shall meet the concerned employee and record the statement.
- Thereafter, the person against whom complaint is made may be called for a deposition before the ICC and an opportunity will be given to him/her to give an explanation, where after, an “Enquiry” shall be conducted and concluded.
- In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

#### **7. Enquiry Process:**

- The ICC shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- The enquiry shall be conducted in a Confidential Manner to protect the aggrieved.
- The ICC shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same
- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- If the Complainant or the person against whom complaint is made desires any witness/es to be called, they shall communicate in writing to the ICC the names of witness/es that they propose to call.
- If the Complainant desires to tender any documents by way of evidence before the ICC, she / he shall supply original copies of such documents. Similarly, if the person against whom complaint is made desires to tender any documents in evidence before the Committee, he /she shall supply original copies of such documents. Both shall affix his /her signature on the respective documents to certify these to be original copies.
- The ICC shall call upon all witnesses mentioned by both the parties. The ICC shall complete the “Enquiry” within reasonable period but not beyond a month and communicate its findings and its recommendations for action to the Management. The report of the ICC shall be treated as an enquiry report on the basis of which action will be taken against the employee.
- On the basis of enquiry report the ICC shall initiate an appropriate disciplinary action against guilty as deemed fit based on the investigation as per the guidelines of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013.

#### **8. Making False or Malicious Complaints**

Where the ICC arrives at a conclusion that the complaint was made with a malicious intent, the ICC shall take strict disciplinary action against the complainant, which action may be similar to the action taken for committing an act of Sexual Harassment. The ICC shall also take strict disciplinary action on

any witness who submits false evidence or produces any forged or misleading document relating to the complaint.

**9. Access to Reports and Documents**

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the company except where disclosure is required under disciplinary or other remedial processes.

**10. Protection to Complainant / Victim**

The company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action. The company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of Sexual Harassment.

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**Heritage Finlease Limited  
Internal Complaints Committee**

<b>S.No</b>	<b>Location</b>	<b>Name</b>	<b>Role</b>
1.	Registered Office	Mrs. Preethi Sri Pakanati	Presiding Officer
2.		Ms. Prasanna Bhargavi Dogiparthi	Member
3.		Mr. Syed Meer Sardar	Member
4.		Mr. Bhudhar Kumar Karuturi	Member
1.		Ms. Mrudula Vemulapati	NGO (External Member)