

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

1. Introduction:

At M/s. Epcogen Private Limited (Epcogen), we are committed to creating and maintaining a work environment where every employee is respected, valued, and safe from sexual harassment. We believe that a workplace that upholds the dignity and rights of every individual is not just a legal obligation but a fundamental aspect of our organizational ethos and culture. In alignment with this commitment, our Prevention of Sexual Harassment (POSH) Policy is not only designed to comply with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, but also to embody our dedication to fostering a safe, inclusive, and equitable work environment.

This policy and its effective implementation underscore our resolve to prevent instances of sexual harassment, provide a robust mechanism for redressal of complaints, and ensure prompt and appropriate action against unacceptable behaviour. We recognize the significance of the POSH Act, 2013, in promoting gender equality and safeguarding women's rights in the workplace. By upholding the principles of this act, Epcogen unequivocally supports and facilitates a professional environment where mutual respect and integrity are the cornerstones, and where every employee, irrespective of their gender, is empowered to contribute to the best of their abilities.

2. Objective:

- 2.1. The primary objective is to prevent and address instances of sexual harassment in the workplace.
- 2.2. The policy aims to ensure that all employees, irrespective of their gender or position, feel safe and respected at work.

3. Scope:

- 3.1. This policy is applicable to all individuals working at all levels and grades, including full-time, part-time, temporary, or contractual staff, interns, and volunteers.
- 3.2. The policy extends to all workplace locations and any work-related travel or events.

4. Definition of Sexual Harassment:

With reference to the definition as per the POSH Act, which includes physical contact and advances, a demand or request for sexual favours, making sexually coloured remarks, showing pornography, and any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature. Inclusion of examples like unwelcome jokes, comments, emails, or gestures, and the creation of a hostile work environment.

5. Redressal Mechanism:

5.1. Internal Complaints Committee (ICC):

Mrs. G. Sarumathidevi, Principal Engineer will be the Presiding Officer to the Committee.

5.2. The ICC should consist of a Presiding Officer (a woman employed at a senior level), not less than two members from amongst employees preferably committed to the cause of women or who have experience in social work or have legal knowledge.

#	Employee Name	Designation	Email
1	G. Sarumathi Devi	Presiding Officer	sarumathi@epcogen.com
2	K. B. Pushpalatha	Member	pushpalatha@epcogen.com
3	K. R. S. R. Krishna	Member	krishna@epcogen.com
4	Sisir Mukherjee	External Member	sisir_mukherjee@hotmail.com

The term of office of the ICC members will extend to three years from the date of nomination.

5.3. Complaint Procedure:

Compliant can be made through any of the mode i.e., Email/SMS/Letter addressing to Presiding Officer

6. Inquiry Process:

6.1. Inquiry process, emphasizing confidentiality and fairness:

Upon receipt of a complaint of sexual harassment, Epcogen is committed to initiating a prompt, thorough, and impartial inquiry. Our approach is designed to respect the dignity and rights of all individuals involved, ensuring both confidentiality and fairness throughout the process. The following outlines the key steps of our inquiry process:

6.2. Initial Assessment:

Upon receiving a complaint, the ICC will conduct a preliminary assessment to determine the necessity of proceeding to a formal inquiry.

6.3. Formal Inquiry Initiation:

If the ICC deems it appropriate, a formal inquiry will be initiated. The complainant and the respondent will be informed about the details of the complaint and the inquiry process.

6.4. Collection of Evidence:

The ICC will collect and examine all relevant documents, emails, and other forms of evidence. Both the complainant and the respondent will have the opportunity to present their case, which may include bringing forward witnesses and submitting any corroborative material.

6.5. Fair Hearing:

The ICC will ensure that both parties are given a fair and equal opportunity to be heard. It will conduct meetings and interviews in a manner that is unbiased and respectful to all parties involved.

6.6. Time Frame:

The inquiry will be completed as promptly as possible and shall make every effort to conclude within 90 days of the complaint being filed.

6.7. Interim Relief:

During the course of the inquiry, the ICC may recommend to the management interim relief measures for the complainant, such as transfer, leave, or any other appropriate measure to ensure their well-being and to prevent further instances of harassment.

6.8. Inquiry Report:

Upon completion of the inquiry, the ICC will prepare a detailed report outlining its findings and recommendations. This report will be submitted to the management and to the complainant and respondent within 10 days of the completion of the inquiry.

6.9. Decision and Action:

Based on the ICC's report, Epcogen will take appropriate action. This action can range from disciplinary measures against the perpetrator (if the complaint is substantiated) to measures against the complainant (in case of a false or malicious complaint), in accordance with the company's disciplinary procedures.

6.10. Appeal:

Both the complainant and the respondent have the right to appeal the decision made by the company based on the ICC's recommendations. The appeal must be filed within 90 days of the receipt of the decision.

7. Responsibilities of the ICC:

7.1. Awareness and Training:

Conduct regular awareness programs and sensitization workshops for all employees on the issues of sexual harassment in the workplace.

Train employees on the provisions of the POSH Act, 2013, and the redressal mechanism available within the company.

7.2. Prevention Initiatives:

Develop and implement preventive measures to ensure a safe, respectful, and harassment-free work environment.

Regularly review employment policies and practices to ensure they align with the POSH Act.

7.3. Receiving Complaints:

Provide a safe and supportive environment for receiving complaints of sexual harassment.

Ensure that the process for filing complaints is accessible, confidential, and sensitive to the complainant's needs.

7.4. Inquiry Process:

Conduct a fair and impartial inquiry into every complaint received, following due process as prescribed in the company's POSH policy and the POSH Act.

Ensure that the inquiry is completed within a timeline, typically 90 days as stipulated under the POSH Act.

7.5. Providing Interim Relief:

Recommend to the management interim relief measures for the complainant, if necessary, such as transfer, special leave, or any other appropriate action to ensure their safety and well-being during the inquiry process.

7.6. Ensuring Confidentiality:

Maintain strict confidentiality throughout the complaint and inquiry process. This includes the identity and addresses of the parties involved, information relating to conciliation and inquiry proceedings, and recommendations of the ICC.

7.7. Documentation and Record Keeping:

Keep a complete record of every complaint, the proceedings, and the outcomes. These records should be kept for a minimum of seven years or as per the POSH Act requirements.

7.8. Preparing and Submitting Reports:

Prepare an annual report with details of the complaints received, the inquiries conducted, and the actions taken. This report should be submitted to the company management and to the District Officer as required by the POSH Act.

7.9. Providing Assistance:

Assist the complainant if they choose to file a complaint with the police regarding an offense under the Indian Penal Code or any other relevant law.

7.10. Conciliation:

Facilitate conciliation between the complainant and the respondent, if requested by the complainant. However, ensure that no monetary settlement is made as a basis of conciliation.

7.11. Making Recommendations:

After the inquiry, recommend to the employer the penalties to be imposed if the allegation is proven, or recommend action against the complainant in case of a false or malicious complaint, while ensuring such action is not taken simply because the complaint could not be proven.

The ICC will also be responsible for any other duties as prescribed under the POSH Act, 2013, or as deemed necessary by Epcogen to ensure a harassment-free workplace.

8. Confidentiality:

8.1. Guaranteeing Confidentiality of Parties Involved:

Epcogen is deeply committed to maintaining the highest level of confidentiality in handling complaints of sexual harassment. All information related to a complaint, including the identities of the complainant, respondent, witnesses, and any other parties involved, will be kept confidential to the fullest extent possible. The ICC shall ensure that no information is disclosed to any unauthorized person during or after the completion of the inquiry process. This includes, but is not limited to, personal details, the nature of the complaint, investigation details, and the outcomes of the process.

8.2. The ICC and all individuals involved in the inquiry process are duty-bound to uphold this confidentiality. Any breach of confidentiality will be viewed seriously and may result in

disciplinary action, including, but not limited to, reprimand, suspension, or termination of employment, in accordance with Epcogen's disciplinary procedures.

8.3. Importance of Maintaining Discretion:

The success of the POSH policy and the trust in the process significantly depend on the discretion maintained by all parties involved. It is imperative that all discussions, proceedings, and documentation related to a complaint of sexual harassment are handled with the utmost discretion and sensitivity. The ICC, while conducting inquiries, will take all necessary steps to ensure that the privacy of the individuals involved is respected and the information is not misused.

The ICC members, as well as any employee privy to information regarding a complaint, are expected to understand the sensitive nature of such matters and maintain discretion to protect the dignity and integrity of all parties involved. The company acknowledges that maintaining such discretion is essential to protect against any potential stigma, retaliation, or victimization that could result from unwarranted disclosure of information.

These clauses emphasize the importance of confidentiality and discretion in handling sexual harassment complaints, reflecting the commitment of the company to a respectful and sensitive inquiry process. It's important that these clauses, like all aspects of the POSH policy, are clearly communicated to all employees and that the ICC members are trained in these protocols. Remember to have these clauses reviewed by legal professionals to ensure they align with the POSH Act and any other relevant legislation.

9. Protection against Victimization:

Epcogen assures all employees that complaints made in good faith will not result in any negative employment consequences for the complainant. This assurance extends to:

- 9.1. No Impact on Employment: The act of making a complaint in good faith will not impact the complainant's job status, opportunities for advancement, work assignments, or any other aspect of their employment.

- 9.2. Protection Against Unfair Treatment: The complainant will be protected against any kind of unfair treatment or prejudice as a result of having made a complaint.
- 9.3. Distinguishing False Complaints: It is important to distinguish complaints made in good faith that could not be substantiated from false or malicious complaints. Actions will only be taken against individuals who are found to have made deliberately false or malicious complaints.

10. Review and Amendments:

- 10.1. Periodic Review of the Policy:
At Epcogen, we understand the importance of keeping our Prevention of Sexual Harassment (POSH) Policy up to date and relevant. Therefore, we commit to a periodic review of this policy to ensure it remains effective, comprehensive, and in line with any legal and regulatory changes. This review will be conducted annually or more frequently if required by changes in legislation, organizational structure, or workforce composition. The review process will include:
- 10.2. Assessment of Policy Effectiveness:
Evaluating the effectiveness of the current policy in preventing and addressing cases of sexual harassment in the workplace.
- 10.3. Feedback from Employees and ICC:
Gathering feedback from employees and the Internal Complaints Committee (ICC) on the policy's effectiveness and areas for improvement.
- 10.4. Alignment with Legal Standards:
Ensuring that the policy is in compliance with the latest legal and regulatory requirements pertaining to workplace harassment.
- 10.5. Recommendations for Revisions:
Identifying areas that require updates or amendments and proposing these changes to the management.

10.6. Proposal for Amendment:

Any proposed amendments to the policy, whether arising from the periodic review or through recommendations from the ICC, employees, or management, should be formally documented and submitted to a designated authority within Epcogen.

10.7. Evaluation of Proposed Amendments:

The designated authority, in consultation with legal advisors and the ICC, will evaluate the proposed amendments for their relevance, necessity, and legal compliance.

10.8. Approval Process:

The final decision to amend the policy will be made by the company's senior management or board of directors. This decision will be based on a thorough assessment of the proposed changes and their impact on the organization.

10.9. Implementation and Communication:

Once approved, the amendments will be formally incorporated into the POSH policy. All employees will be notified of these changes through internal communication channels. Necessary training or awareness sessions will be conducted to ensure all employees understand the revised policy.

10.10. Documentation and Record Keeping:

A record of all amendments made to the policy will be maintained for reference and compliance purposes.

Epcogen is committed to ensuring that our POSH policy reflects the best practices and legal standards, creating a safe and respectful workplace for all our employees.