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## **Policy on Prevention of Sexual Harassment (POSH)** **of Women at Workplace**

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### **1. PURPOSE:**

This Policy on Prevention of Sexual Harassment (POSH) ["Policy"] is framed in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ["Act"] and the Rules framed thereunder which is aimed at providing every woman at the workplace a safe, secure and dignified work environment.

### **2. SCOPE:**

M/s F Mec International Financial Services Limited (Hereinafter referred to as the "Company") aims to adopt zero tolerance attitudes against any kind of Sexual Harassment or discrimination caused by any employee during their tenure towards any other person being an employee of the Company, Client, Vendor and Contractor in Company premises or elsewhere in India or abroad.

### **3. DEFINITION**

- **Employee**– Includes person carrying out any work on behalf of M/s F Mec International Financial Services Limited and may have been hired as Permanent, Temporary, Contracted or on Retainer Ship Basis, part-time basis etc., either directly or indirectly or through vendor organization.
- **Sexual Harassment** – Any conduct that is unwelcome and sexual in nature, whether direct or indirect, including physical contact and advances, a demand or request for sexual favours, making sexually coloured remarks, circulating obscene content by email, SMS or WhatsApp message, showing pornography, or any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. When any such act or acts are committed in circumstances where such conduct is humiliating and is likely to constitute a health and safety problem, it will amount to sexual harassment that violates this Policy.

Sexual harassment may occur as a single incident or a series of incidents and may include, but will not be limited to the following which may interfere with an individual's performance by contributing to the creation of an intimidating, hostile or offensive environment:

- (a) Implied or explicit promise of preferential treatment in employment, or
- (b) Implied or explicit threat of detrimental treatment in employment, or
- (c) Implied or explicit threat of detrimental treatment about present or future employment status

Sexual harassment may be of **two kinds**:

- (1) **indirect**, also referred to as a "**hostile work environment**" and
- (2) **direct**, also referred to as a "**Quid Pro Quo**".

- The **indirect form of sexual harassment** is one or more instances of unwelcome conduct that, taken individually or together, have the purpose or effect of:

- (i) Creating an **intimidating, hostile, or offensive work environment**, and
- (ii) **Unreasonably interfering** with another's work performance. Examples of this type of sexual harassment include pornography in public places, foul language or joking of a sexual

nature. This form of sexual harassment does not need to be directed at any employee in particular.

➤ Sexual harassment by **one in a position of power or influence** constitutes **Direct, or Quid Pro Quo**, sexual harassment when:

- (i) Submission by an individual is made either an explicit or implicit term or condition of employment, or
  - (ii) Submission to or rejection of such conduct is used as the basis for employment decisions affecting that employee such as promotions, demotions, salary raises, hiring or termination.
- Aggrieved Women - In relation to workplace, a woman of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent.
  - Respondent: Employees against whom the complaint has been filed.

#### **4. INTERNAL COMMITTEE:**

In accordance with the Act, the company has constituted Internal Committees ["ICs"] to prevent instances of Sexual Harassment against women and to effectively deal with complaints involving Sexual Harassment.

The Internal Committee comprises of:

- Presiding Officer: A woman employed at a senior level in the organization or workplace
- At least 2 members from amongst employees, committed to the cause of women and or having legal knowledge
- One external member, familiar with the issues relating to sexual harassment
- At least one half of the total members is women

#### **5. Filing A Complaint**

Any aggrieved employee may approach the IC with a complaint of sexual harassment under this Policy and shall also file the complaint on SHE-Box PORTAL. The following steps will be followed in this regard:

(a) A complaint of sexual harassment is to be filed within a time limit of three (3) months. This may be extended to another three (3) months if the Complainant can prove that grave circumstances prevented them from doing the same within the stipulated time of three months.

(c) No person against whom a complaint is made shall be part of the IC.

(d) Within seven (7) working days of the receipt of the complaint, the IC has to send a copy of the complaint to the Respondent ("Counter Party") who will have ten (10) working days to file reply along with list of documents, names and addresses of witnesses.

#### **6. Resolution procedure through conciliation**

Once the complaint is received, before initiating the inquiry the committee may take steps to conciliate the complaint between the complainant and the respondent. This is only if requested by the aggrieved woman.

In case a settlement is arrived at, the committee records & reports the same to the employer for taking appropriate action. Resolution through conciliation happens within 2 weeks of receipt of complaint.

#### **7. Resolution procedure through Formal Inquiry**

The committee initiates inquiry in the following cases:



- No conciliation is requested by aggrieved woman
- Conciliation has not resulted in any settlement
- Complainant informs the committee that any term or condition of the settlement arrived through conciliation has not been complied with by respondent

#### **8. Action to be taken after Inquiry**

The Committee is required to complete the inquiry within a time period of ninety (90) days from the date on which the Complaint is filed by the Complainant. Post the inquiry the committee submits its report containing the findings and recommendations to the Management, within 10 days of completion of the inquiry. Management shall take action within **60 days** of receiving the report.

- **Complaint unsubstantiated**

Where the committee arrives at the conclusion that the allegation against the respondent has not been proved, it recommends to the employer that no action is required to be taken in this matter.

- **Complaint substantiated**

Where the committee arrives at the conclusion that the allegation against the respondent has been proved, it recommends to the employer to take necessary action for sexual harassment as misconduct, in accordance with the applicable service rules and policies, and this may include:

- Counseling
- Censure or reprimand
- Apology to be tendered by respondent
- Written warning
- Withholding promotion and/or increments
- Suspension
- Termination
- Or any other action that the Management may deem fit.

**9. Annual report** summarizing complaints and Redressal of Sexual harassment shall be prepared by designated person. The said report as well as all documents regarding Sexual Harassment complaints shall be in the custody of designated person and will be termed as 'Strictly Confidential'.

#### **10. MONITORING AND REVIEW**

This Policy and Procedure will be reviewed whenever required from the date of implementation. Reviews will be initiated by the HR Department. Where changes in employment legislation occur that directly affect this Policy, these will be reflected with immediate effect and communicated through HR.

**For & On Behalf of Internal Committee of  
F Mec International Financial Services Limited**

**Ronika Dhall**  
Presiding Officer

