

## **POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT WORKPLACE (POSH)**

### **1. Policy Statement**

- 1.1 Sanghvi Movers Limited, together with its subsidiaries and group entities (“Company”), is committed to providing a safe, respectful, and dignified work environment free from sexual harassment.
- 1.2 Sexual harassment is treated as a serious misconduct and shall invite strict disciplinary and legal action.
- 1.3 This Policy is formulated in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules framed thereunder.

### **2. Objective**

- 2.1 Prevent and prohibit sexual harassment at the workplace
- 2.2 Provide a fair, confidential, and time-bound complaint redressal mechanism.
- 2.3 Promote awareness and accountability to maintain a respectful workplace

### **3. Preamble and Purpose:-**

- 3.1 Sanghvi Movers Limited, together with its direct and indirect subsidiaries and branch offices (“SML”, “we”, “us”, or “our”), is committed to providing a work environment that is free from sexual harassment, intimidation, and any form of abuse or discrimination and in which all persons are treated with dignity, respect, and courtesy.
- 3.2 Sexual harassment at the workplace or any place connected with work i.e. extended workplace is a serious misconduct and a violation of law and will attract strict disciplinary action in addition to any legal consequences under applicable statutes.
- 3.3 This Policy is framed in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”) and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 (“POSH Rules”), as amended from time to time.

#### 4. Scope and Applicability:-

- 4.1 This Policy extends to SML, and its direct and indirect subsidiaries and all the offices, branches, and units in India.
- 4.2 It covers the following (“Employees” and “Persons” for the purpose of this Policy):
- 4.2.1 “Employees” shall mean and include permanent, temporary, probationary, part-time, or full-time employees; contract workers; consultants; retainers; secondees; apprentices; trainees; and interns (whether paid or unpaid).
- 4.2.2 “Individuals” shall mean and include persons visiting the workplace in any capacity, including vendors, service providers, and guests, for the purposes of protection and conduct at the Company’s premises.
- 4.3 This policy covers all alleged instances of sexual harassment that occur within the scope of employment, regardless of physical location. This encompasses, but is not restricted to:

The workplace (as defined below)-Any work-related context outside of the Workplace, including, but is not limited to, business travel, off-site meetings, training sessions, conferences, work-related social functions, and employer-provided transportation.

#### 5. Definitions:-Unless the context requires otherwise, the terms used in this Policy shall have the meanings assigned below, consistent with the POSH Act and POSH Rules.

- 5.1 “**Aggrieved Individual**” means, in relation to a workplace, any person, of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment by the Respondent and includes contractual, temporary staff and visiting individuals.
- 5.2 “**Complainant**” means the Aggrieved Individual or a person entitled to make a complaint on their behalf in accordance with Section 9 of the POSH Act and Rule 6 of the POSH Rules (e.g., legal heir, relative, friend, co-worker, or authorized officer, as applicable).
- 5.3 “**Respondent**” means a person against whom a complaint of sexual harassment has been made.
- 5.4 “**Employee**” means a person employed at the workplace for any work on a regular, temporary, ad-hoc, or daily wage basis, either directly or through an

agent, including a contractor, with or without remuneration, or working on a voluntary basis, and includes co-workers, probationers, trainees, and apprentices.

- 5.5 **“Employer”** means a person or group of persons responsible for the management, supervision, and control of the workplace, including the authority to recruit, terminate, or discipline employees, and for the purpose of this Policy includes the Director & General Manager, Chief People Officer (CPO), and Chief Operating Officer (COO) or the Chief Executive Officer (CEO) and any other officer as may be notified under the POSH Act.
- 5.6 **“Internal Complaints Committee”** or **“ICC”** means the committee constituted by the Employer under Section 4 of the POSH Act at each office/establishment for the redressal of complaints of sexual harassment.
- 5.7 **“Workplace”** shall mean all offices, branches, units, or establishments of the Company, any place visited by an Employee in the course of employment (including employer-provided transportation), and any virtual or digital space where work-related interaction occurs.
- 5.8 **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):
- 5.8.1 *Physical contact and advances.*
  - 5.8.2 *Demand or request for sexual favours.*
  - 5.8.3 *Making sexually coloured remarks.*
  - 5.8.4 *Showing pornography.*
  - 5.8.5 *Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.*

**Further, the following circumstances, among other things, may amount to sexual harassment if connected with any act or behaviour of sexual nature:**

- 5.8.6 *Implied or explicit promise of preferential treatment in employment.*
- 5.8.7 *Implied or explicit threat of detrimental treatment in employment.*
- 5.8.8 *Implied or explicit threat about present or future employment status.*
- 5.8.9 *Interference with work or creation of an intimidating, offensive, or hostile work environment.*
- 5.8.10 *Humiliating treatment likely to affect health or safety.*

## **6. Constitution of Internal Complaints Committee (ICC):-**

- 6.1 SML has constituted Internal Complaints Committee (ICC) in accordance with the provisions of the POSH Act.
- 6.2 **Each ICC shall comprise:**
  - 6.2.1 **Presiding Officer** – A senior woman employee at the workplace.
  - 6.2.2 **At least two Employee Members** – From amongst employees preferably having experience in social work, women’s issues, or legal knowledge.
  - 6.2.3 **One External Member** – From an NGO or association committed to the cause of women or a person familiar with issues relating to sexual harassment.
- 6.3 At least one-half of the total members of the ICC shall be women.
- 6.4 The composition, names, designations, and contact details of the ICC members for Sanghvi Movers Limited and Sangreen Future Renewables Private Limited (SFRPL) are provided in Annexure A and Annexure B to this Policy respectively.
- 6.5 Any change in the ICC composition will be notified to Employees and updated in the respective Annexure from time to time.
- 6.6 The Presiding Officer and each ICC member hold office for a term not exceeding three years from the date of their nomination.
- 6.7 The names and contact details of all ICC members have been prominently displayed at conspicuous places in each workplace and have been notified to all Employees through this policy.
- 6.8 The Employer ensures that ICC members receive periodic orientation and capacity-building training on handling complaints and conducting inquiries.

## **7. Functions of the ICC:-**

- 7.1 Receive and acknowledge complaints of sexual harassment at the workplace.
- 7.2 Examine and evaluate written complaints and conduct inquiries in accordance with the POSH Act, Rules, and this Policy.
- 7.3 Recommend appropriate interim relief during the pendency of inquiry where necessary.
- 7.4 Submit a reasoned inquiry report with findings and recommendations to the Employer.
- 7.5 Maintain strict confidentiality of all proceedings and records.

7.6 Prepare and submit an Annual Report to the Employer and District Officer, containing the details mandated under Section 21 and Rule 14 (e.g., number of complaints received, disposed, pending, and action taken).

## **8. Complaint Mechanism:-**

### **8.1 Manner and Time Limit for filing a Complaint:-**

8.1.1 A Complainant may file a complaint of sexual harassment in writing to the ICC within three (3) months from the date of the incident; in the case of a series of incidents, within three months from the date of the last incident.

8.1.2 The ICC may extend this time limit by a further period of three (3) months if it is satisfied that the circumstances prevented the Complainant from filing the complaint earlier, and shall record the reasons in writing.

8.1.3 Where the Complainant is unable to make a written complaint, the ICC shall render all reasonable assistance in writing down the complaint.

8.1.4 Where the Complainant is unable to file a complaint due to physical or mental incapacity, or in the event of death, a complaint may be filed by persons specified under the POSH Rules (such as a relative, friend, co-worker, or legal heir, as applicable).

8.1.5 The Company may adopt the standard template as complaint format prescribed under the POSH Rules or as notified by competent authorities from time to time.

### **8.2 Conciliation: -**

8.2.1 The ICC may, at the written request of the Complainant, take steps to settle the matter between the Complainant and Respondent through conciliation, provided that no monetary settlement forms the basis of conciliation.

8.2.2 If a settlement is arrived at, the ICC shall record the terms of settlement, provide copies to both parties, and forward the same to the Employer for implementation; no further inquiry shall be conducted.

8.2.3 The Company notes that proposed amendments to the POSH Act seek to remove the conciliation option in the future; this Policy shall be updated if and when such amendments are notified.

### **8.3 Inquiry Procedure:-**

- 8.3.1 Upon receipt of a complaint, the ICC shall:
  - a. Send a copy of the complaint to the Respondent within 7 days.
  - b. Require the Respondent to submit a written reply along with supporting documents and witness details within 10 days.
- 8.3.2 The ICC shall complete the inquiry within 90 days from receipt of the complaint.
- 8.3.3 The ICC shall follow the principles of natural justice and give both parties a reasonable opportunity to be heard, present evidence, and produce witnesses.
- 8.3.4 Parties may not be allowed to directly cross-examine each other; questions, if any, shall be routed through the ICC.
- 8.3.5 A minimum of three ICC members, including the Presiding Officer, shall be present during inquiry proceedings.
- 8.3.6 On completion of the inquiry, the ICC shall provide a written report of its findings and recommendations to the Employer and to the parties within 10 days.
- 8.3.7 All proceedings, documents, and evidence shall be treated as confidential and stored securely as per statutory requirements.

### **9. Interim Relief:**

- 9.1 During the pendency of the inquiry, based on a written request by the Complainant, the ICC may recommend to the Employer one or more of the following:
  - 9.1.1 Transfer of the Complainant or Respondent to another workplace.
  - 9.1.2 Grant of paid leave to the Complainant up to a period of three months, in addition to regular entitlement.
  - 9.1.3 Restriction on Respondent's access to the Complainant or change of reporting structure.
  - 9.1.4 Any other relief deemed appropriate under the circumstances.
- 9.2 The Employer shall implement such recommendations and report compliance to the ICC.

### **10. Inquiry Findings and Action:-**

- 10.1 **If Allegation is Not Proved-** If the ICC concludes that the allegation is not proved, it shall recommend that no action be taken against the Respondent

and that the matter be closed, subject to the provisions on malicious complaints below.

- 10.2 **If Allegation is Proved-** If the ICC concludes that sexual harassment has occurred, it shall recommend to the Employer one or more of the following actions, in accordance with service rules and the POSH Act:
- 10.2.1 Written apology, warning, reprimand, or censure.
  - 10.2.2 Withholding promotion, pay rise, or increments.
  - 10.2.3 Suspension or transfer to another role or location.
  - 10.2.4 Termination of employment.
  - 10.2.5 Deduction from salary or wages for payment of compensation to the Complainant.
  - 10.2.6 Initiation of appropriate legal action under the Indian Penal Code, currently BNS 2023 or other applicable laws.
- 10.3 The Employer shall act on the ICC's recommendations and implement them within 60 days of receipt of the inquiry report.
- 10.4 Determination of Compensation- In recommending compensation, the ICC shall consider:
- 10.4.1 Mental trauma, pain, suffering, and emotional distress.
  - 10.4.2 Loss of career opportunity or professional growth.
  - 10.4.3 Medical expenses incurred.
  - 10.4.4 Income and financial status of the Respondent.
  - 10.4.5 Feasibility of lump-sum or instalment payments.

#### **11. Malicious Complaints:-**

- 11.1 If the ICC concludes that the complaint was made with malicious intent or that false or misleading evidence was knowingly produced, it may recommend appropriate disciplinary action against the Complainant or the person who made the complaint.
- 11.2 Mere inability to substantiate a complaint or provide adequate evidence shall not attract action against the Complainant; malicious intent must be clearly established through a separate recorded finding.

#### **12. Confidentiality:-**

- 12.1 No person, including ICC members, parties, or witnesses, shall disclose any information about the complaint, identity of parties, witness details,

proceedings, or recommendations to the public, press, or media, except as required by law.

- 12.2 Breach of confidentiality may result in disciplinary action and penalties as provided under Section 17 of the POSH Act and applicable service rules/SML code of conduct.

### **13. Appeal:-**

Any person aggrieved by the recommendations of the ICC or non-implementation of such recommendations may prefer an appeal to the appellate authority (concerned Industrial Court or Labour Court having jurisdiction) in accordance with Section 18 of the POSH Act and applicable service rules, within the prescribed limitation (currently 90 days).

### **14. Duties of the Employer:-**

The employer shall –

- 14.1 Provide a safe working environment, including safety from persons coming into contact at the workplace.
- 14.2 Treat sexual harassment as misconduct under service rules and take appropriate action.
- 14.3 Display at conspicuous places the penal consequences of sexual harassment and details of the ICC members.
- 14.4 Organize regular workshops, sensitization programmes, and orientation for Employees and ICC members on POSH compliance.
- 14.5 Provide necessary facilities, documents, and assistance to the ICC for conducting inquiries.
- 14.6 Assist the Complainant in filing a police complaint where requested and where the conduct amounts to an offence under the Indian Penal Code/currently BNS 2023.
- 14.7 Monitor timely submission of the ICC's Annual Report and ensure statutory disclosures (including under Companies Act/SEBI or MCA notifications, if applicable) are duly made.

### **15. Duties of Employees:-**

- 15.1 Refrain from any act that may amount to sexual harassment or contribute to a hostile environment.
- 15.2 Support and cooperate with the ICC or other authorities during inquiries and provide truthful information.

- 15.3 Maintain confidentiality of complaints, inquiries, and related information.
- 15.4 Attend and actively participate in POSH sensitization and training programmes.

**16. Review, Amendment, and Harmonization:-**

- 16.1 This Policy shall be reviewed periodically and may be amended in line with changes in law, judicial pronouncements, or notifications, including the proposed POSH Amendment Act, 2024, once enacted.
- 16.2 In case of any conflict between this Policy and the POSH Act/Rules as amended from time to time, the provisions of the POSH Act/Rules shall prevail.
- 16.3 The Annexures to this Policy shall form an integral part of the Policy and shall be read together with its provisions.



**Employee Acknowledgment:-**

**Employee Declaration-**

I acknowledge that I have received, read, and understood the “Prevention of Sexual Harassment (POSH) Policy” of the Company.

I agree to abide by the provisions of this Policy and understand that violation may lead to disciplinary action.

Name: \_\_\_\_\_

Employee ID: \_\_\_\_\_

Designation: \_\_\_\_\_

Department: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Annexure-A  
(Internal Complaints Committee ICC- SML)**

<b>Name</b>	<b>Designation</b>	<b>Role in ICC</b>	<b>Contact Number</b>
Ms. Sonali Sharma	General Manager - Legal	Presiding Officer	9154987753
Ms. Radhika Mungale	Sr. Manager- Human Resources	Committee Officer	8600125462
Mr. Anup Sharma	General Manager - Human Resource	Committee Officer	9028526338
Mr. Satish Irale	General Manager - Supply Chain Management	Committee Officer	8956677460
Ms. Meghana Marathe	-	Committee Officer (External)	9823267077

**Annexure-B  
(Internal Complaints Committee ICC- SFRPL)**

<b>Name</b>	<b>Designation</b>	<b>Role in ICC</b>	<b>Contact Number</b>
Ms. Sonali Sharma	General Manager – Legal (SML)	Presiding Officer	9154987753
Ms. Radhika Mungale	Sr. Manager- Human Resources	Committee Officer	8600125462
Mr. Satish Irale	General Manager - Supply Chain Management	Committee Officer	8956677460
Mr. Sunny Gupta	Manager - Projects	Committee Officer	9561601418
Ms. Meghana Marathe	-	Committee Officer (External)	9823267077

**POLICY UPDATES & VERSION CONTROL**

<b>Version</b>	<b>Date (approved by Board)</b>	<b>Changes</b>
Latest	06/02/2026	NA