

TSA Process Equipments Pvt. Ltd.	Prevention of Sexual Harassment at the workplace (POSH)	Doc No:	TSA/HR/002
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1. PURPOSE:

To create and maintain safe work environment, free from sexual harassment & discrimination for all its employees. Establish guidelines as per the guidelines of “The Sexual harassment of women at workplace (prevention, prohibition & redressal) Act, 2013.

2. SCOPE:

This policy shall be applicable to all employees of TSAPEPL and its subsidiaries including any associate engaged on fixed term contract, short term engagement, temporary, apprentice, trainees, sandwich trainees, summer trainees, in-plant trainees, contract persons and visitors on our premises. It shall also include any unwelcome behaviour of sexual nature mentioned in the policy by any Vendor / Supplier / Contractor including their agents, supervisors, managers and their employees to any of our employees on our premises.

3. APPLICABILITY:

All employees of **TSAPEPL**.

4. DEFINITION:

I. Employee of TSAPEPL – Includes person carrying out any work on behalf of TSAPEPL 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

II. Sexual Harassment – Harassment of a Female/Male employee consisting of any unwelcome sexually determined behaviour, whether directly, indirectly, by any male/female in charge of the management or a male/female co-employee either individually or in association with other persons to exploit the sexuality of co-employee to harass him/her in a manner which prevents or impairs his/her full utilization of full benefits, facilities or opportunities or any other behaviour which is generally considered to be derogatory .

III. 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.

IV. Respondent - Employees against whom the complaint has been filed.

Approved By : Managing Director	Released By: HR
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5. POLICY GUIDELINES:

Sexual Harassment shall include but not limit to: -

- Physical Contact & Sexual advances
- Demand or request for sexual favors;
- Sexually- colored remarks;
- Showing pornography;
- Any other unwelcome physical, verbal or non-verbal or written conduct of a sexual nature.

“Unwelcome sexually determined behavior” includes but is not limited to

- Subjecting another person to an unwelcome act of physical intimacy including grabbing, brushing, touching, including sexual flirtations, advances or propositions.
- Making any unwelcome remark with sexual connotations like sexually explicit remarks, cracking jokes or using sentences with sexual connotations or making sexist remarks.
- Showing any sexually explicit visual material in the form of pictures / cartoons / pin-ups / calendars / screen-savers on computers / any offensive written or electronic material including pornographic material.
- Engaging in any other unwelcome conduct of a sexual nature, verbal or even non- verbal, staring to make the other person uncomfortable, making offensive gestures,etc.
- Sending unwelcome communication of a sexual nature, through email, letter, mobile technology or any other form of written or electronic communication or exhibiting conduct of a sexual nature.
- Making an unwelcome demand or request whether directly or by implication for sexual favors and / or making it a condition of employment / payment of wages / increment / Promotion / preferential treatment / threat to detrimental treatment in employment / threat to current or future employment

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status or similar act.

- Where a supervisor requests sexual favors from a junior (or any other person) in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits or continued employment or threatens to terminate any such person for non-co-operation.
- Where a boss or other senior person intrudes into the private life of employees or persistently asks them out.
- Where any employee(s) make(s) sexual epithet, jokes, written or oral references to sexual conduct, and / or gossip regarding one's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess in an attempt to humiliate or make another person uncomfortable.
- Behavior which creates an environment that is intimidating, hostile, offensive, humiliating for women employee.

6. GRIEVANCE MECHANISM: PROCEDURE TO REGISTER COMPLAINTS:

A complaint shall be submitted written to HR Department or can be discussed during the meeting with any member of the Internal Committee mentioned herein within 3 months of occurrence of an act of Sexual Harassment. If the respondent is direct supervisor of the complainant, or person influencing the career growth of the complainant, the reporting structure will be changed till the time the enquiry is completed.

7. INTERNAL COMMITTEE:

- Each complaint of Sexual Harassment shall be dealt with utmost confidentiality and urgency by an Internal committee consisting of:

Sl. No.	Name of Person	Designation	Committee Member
1	Shraddha Gad	HR Manager	Presiding Officer
2.	Swapnali Mahadik	Proposal Head	Internal Member
3.	Ashish Mehta	Head of HR & Admin	Internal Member
4.	Neeta Reshamiya	Consultant	External Member

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b. Within 3 working days, the internal committee shall commence Official Internal Enquiry by:

- by informing the said complaint to the respondent.
- By instructing to stop the alleged act of Sexual Harassment immediately
- By informing not to reach out to the complainant directly or indirectly
- BY asking an immediate explanation from him/her to the same

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C. Within 5 working days from the receipt of original complaint, the designated person shall respond in writing to the complainant informing him/her about the initial steps taken by TSAPEPL in order to stop the alleged act(s)

d. Within 15 days from receipt of the complaint, the Internal committee shall record and accordingly communicate in writing to the complainant and the Respondent, its prima facie findings, upon giving the concerned parties a fair and due opportunity to represent themselves and upon conducting fact finding, truth verification and counselling sessions with persons involved in alleged act(s)

e. A complaint will be closed no later than one month from receipt of complaint by recording the decisions of the internal committee, accordingly informing to the complainant and the Respondent of the same.

f. Employees are duty bound to assist in investigative steps, employees' wholehearted participation shall be mandatory in this regard. Whistleblowers shall be protected from exposure, retaliation or hostility.

g. Within 2 working days from receipt of prima facie findings or the charges, if the complainant or the Respondent is dissatisfied with the decision of internal committee, she or he may appeal specifying the reasons in writing to Managing Director. Within 5 working days from the receipt, the appeal shall be finally disposed of by written communication to the said party. The decision of Managing Director shall be final and cannot be appealed.

8. REDRESSAL:

a. An amicable resolution of the complaint is possible only with the written consent of the complainant.

b. Within 24 hours of closing the case file, the internal committee shall present the same to and inform its decision to the Managing Director.

c. In case of decision establishing the offence of Sexual Harassment of the complainant, within 3 working days, the internal committee shall recommend Disciplinary action against the offender

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considering the nature and extent of injury caused to the complainant, prior complaints or repetition of offence etc and the impact of the offence on the company profile as a whole.

d. The position of the offender and the criticality of the position occupied by the offender shall not be any hindrance to the disciplinary action taken against the offender.

. The disciplinary action that shall be commensurate with the nature of the gravity of the offence, shall include but not limited to,

- Warning
- Written apology from offender,
- Bond of good behaviour
- Transfer
- Debarring from supervisory duties
- Denial of employee benefits like increments/promotion/salary correction etc.
- Cancellation of specific work Assignment
- Suspension
- Dismissal

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'.

Mechanisms to strengthen implementation of Policy:

- Communicate the policy by making it available on HRMLive for employees to refer.
- Display constitution of Internal Committee.
- Make the policy a part of the Corporate Induction.
- Inclusion of the number of cases reported and resolution in the Annual Report.
- Appropriate Government can call upon companies / inspect records related to Policy on sexual harassment and its implementation.

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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.

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Date: - 1st January 2024

CIRCULAR

To,

All member of TSA Process Equipments Pvt. Ltd.

Sub: - Constitution of 'Internal & External Complaints Committee' for Sexual Harassment of Women
At Workplace (Prevention, Prohibition and Redressal) Act 2013.

In compliance with the above referred Circular the following employee has been appointed
as member of 'Internal & External Complaints Committee' under the above act.

Sr. No.	Name of Person	Designation	Committee Member	Contact No.	Email ID
1	Shraddha Gad	HR Manager	Presiding Officer	8425867743	hr@tsapepl.com
2	Swapnali Mahadik	Proposal Head	Internal Member	8237634063	swapnalid@tsapepl.com
3	Ashish Mehta	Head of HR & Admin	Internal Member	9821220365	ashish@tsapepl.com
4	Neeta Reshamiya	Consultant	External Member	9820021788	neeta.reshamiya@gmail.com

ICC shall comply with the procedure prescribed under the Sexual Harassment Act for inquiring into the complaint in a time bound manner.

All concerned are requested to note the above.

For TSA process Equipments Pvt Ltd

Authorized Signatory
Apurva Shah
Managing Director