

# **Policy on Prevention of Sexual Harassment (POSH)**

---

**Revised on: 24<sup>th</sup> June, 2024**

## Table of Content

---

	Page No.
1. Policy Statement.....	3
2. Purpose.....	3
3. Applicability and Scope.....	3
4. Definition.....	3-4
5. Preventive Action.....	4
6. Internal Complaints Committee.....	4
7. Procedure & Guidelines.....	5-7
8. Punishment for False or Malicious Compliant .....	7
9. Policy Implementation and Review.....	7

## **1. Policy Statement**

---

HLS Asia Limited is committed to adopt “Zero Tolerance” attitude against any kind of Sexual Harassment or discrimination, to ensure providing a workplace where all the associates are treated with respect and dignity and to provide work environment at all locations that is conducive to fair, safe and harmonious relations, based on mutual trust and high esteem between all the associates of the Company. We also strive to guarantee a safe and welcoming environment to all those who visit any of our locations in any capacity, such as customers, vendors, trainees etc. Discrimination and harassment of any type is strictly prohibited. We wish to promote and maintain this culture to ensure that associates of the Company do not engage in practices that are abusive in any form or manner whatsoever.

The Company aims to provide a safe working environment and prohibits any form of sexual harassment. Hence any act of sexual harassment or related retaliation against or by any associate is unacceptable. This policy therefore, intends to prohibit such occurrences and also details procedures to follow when an associate believes that a violation of the policy has occurred within the ambit of all applicable regulations regarding sexual harassment.

## **2. Purpose**

---

Any act of Sexual Harassment results in violation of the fundamental right of a woman to equality, her right to live life with dignity and right to practice her profession which includes a safe environment free from sexual harassment. Hence the objective of this policy on Prevention of Sexual Harassment (PoSH) is to provide protection against sexual harassment of women at workplace and for prevention and redressal of complaints of sexual harassment and for matters connected with and incidental to it. It is a non-negotiable requirement to ensure safety for women who are part of the workforce.

## **3. Applicability and Scope**

---

HLS Asia Limited aims to adopt zero tolerance attitude against any kind of Sexual Harassment or discrimination caused to any woman employee during her tenure in HLSA or by any other person including an employee of HLSA in any Workplace of the Company.

This Policy is applicable to all the employees of HLS Asia Limited at all locations.

## **4. Definition**

---

“Sexual Harassment” includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely:-

- (i) Physical contact and advances; or
- (i) A demand or request for sexual favours; or
- (ii) Making sexually coloured remarks; or
- (iii) Showing pornography; or
- (iv) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.”

Following circumstances amongst other aforementioned circumstances may constitute sexual harassment if it occurs or is present in relation or connected with any act or behaviour of sexual harassment:

- (i) Implied or explicit promise of preferential treatment in their employment;
- (ii) Implied or explicit threat of detrimental treatment in their employment;
- (iii) Implied or explicit threat about their present or future employment status;
- (iv) Interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- (v) Humiliating treatment likely to affect the health and safety of the aggrieved person.

## 5. Preventive Action

The Company will take reasonable steps to ensure prevention of sexual harassment at work which may include circulating and uploading on website applicable policies and other relevant information to all associates. All the associates and new joiners of the organization are required to attend the webinars and trainings on Prevention of Sexual Harassment conducted by organisation at regular interval of time.

## 6. Internal Complaints Committee

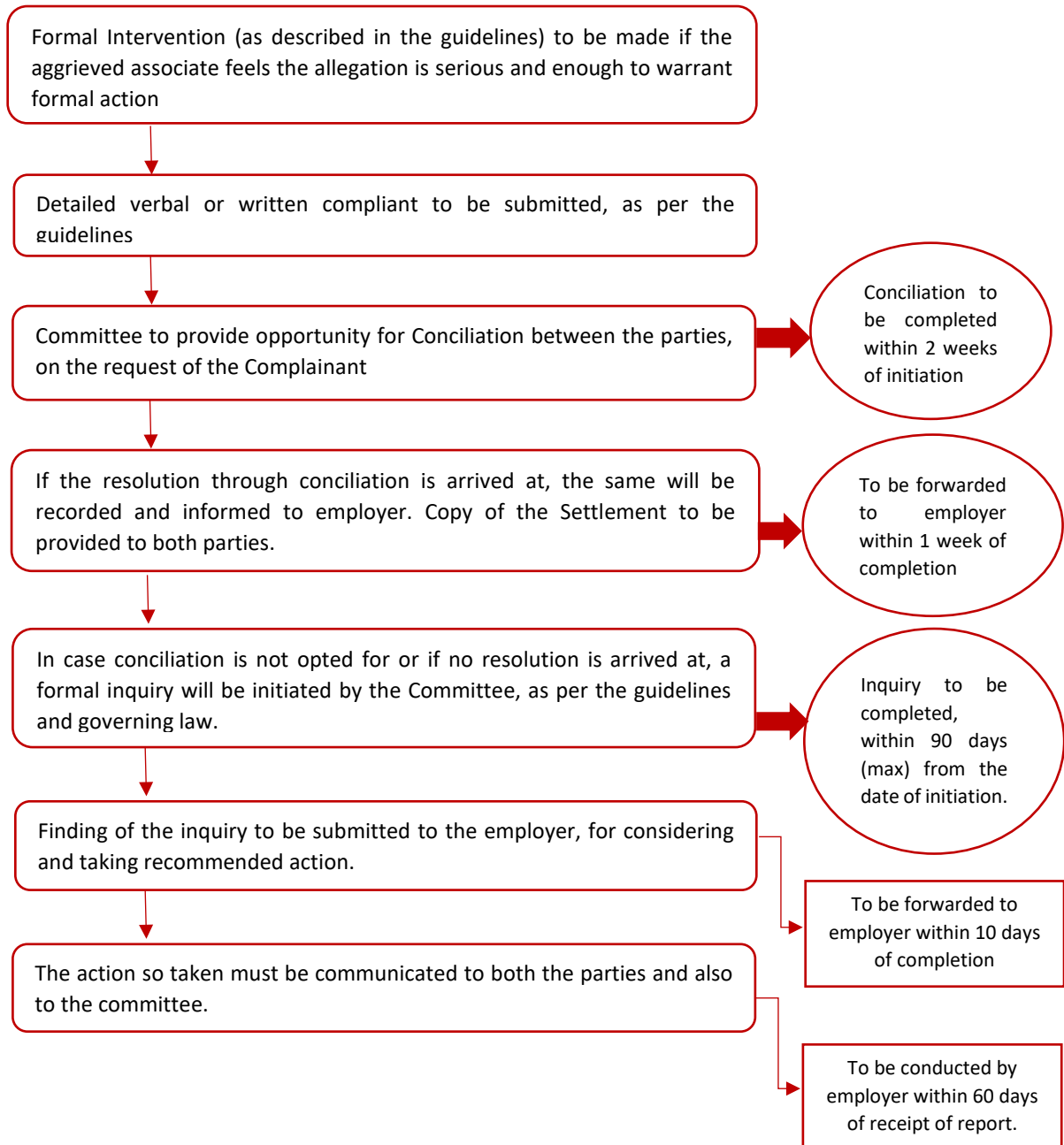
The Company has constituted an Internal Complaints Committee ("ICC") at organisation level, to specifically address any complaints of sexual harassment. The Committee constituted by the Company would be headed by a Presiding Officer, who shall be a woman Associate employed at a senior level at workplace from amongst the Associates. The Internal Committee may, before initiating an inquiry, at the request of the aggrieved associate take reasonable steps to settle the matter between him/her and the respondent through conciliation. Failing such exercise of conciliation, if any, such concerns/ complaints shall be inquired into by the Internal Complaints Committee and followed by action(s) as are deemed necessary, as per the Redressal Mechanism provided herein below and as provided by the law.

At present, the Internal Complaints Committee comprises of the following members and shall continue till their respective tenure or till any change is notified by the Management, whichever is earlier:

S. No.	Name	Capacity	Mobile No	Email
1.	Mrs. Anjali Grover	Presiding Officer	+44 7795 971517	anjali.grover@hlsasia.com
2.	Mr. Badal Singh Solanki	Member	+91 9867627555	badal.solanki@hlsasia.com
3.	Mrs. Priyanka Jaiswal	Member	+91-9971145526	priyanka.jaiswal@hlsasia.com
4.	Mrs Nilanjana Ganguli Mondal	Member	'91-9818779456	nilanjana.mondal@hlsasia.com
5.	Mr. Anil Baijal	Member (External)	+91-9711729991	anilbaijal2002@yahoo.com

## 7. Procedure and Guidelines

Procedure for redressal of sexual harassment of women explained in below flow chart:



Guidelines for redressal of sexual harassment of women to be followed:

- The aggrieved person may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee giving details of the sexual harassment meted out to her within a period of 3 months from the date of incident or in case of a series of incidents, within a period of 3 months from the date of last incident, which may be extended for a further period of 3 months, if circumstances warrant such extension in the opinion of the Internal Complaints Committee.
- The Presiding Officer or any Member of the Internal Complaints Committee may render reasonable assistance to the aggrieved person for making complaint in writing, in case they are unable to do so.
- On receipt of the complaint, the Internal Complaint Committee shall decide the date, place and time for hearing the complaint and shall intimate the date, time and place of hearing to the aggrieved person/ Complainant and Accused. The Internal Complaints Committee shall follow the principles of Natural Justice while handling such complaints i.e., full opportunity to Complainant and Respondent to be heard in support of their respective case of complaint or defence.
- Where the aggrieved person, due to any reason, is unable to file a complaint with the internal Complaints Committee, a complaint may be filed by any of the following persons:
  - a relative or friend; or
  - a co-worker; or
  - an officer of the National Commission for Women or State Women's Commission; or
  - any person who has knowledge of the incident, with the written consent of the aggrieved person.
- Internal Complaints Committee on receipt of such written complaint, may, if required, ask the aggrieved person to furnish additional information/document about the alleged harassment.
- On receipt of such complaint, Internal Complaints Committee shall provide a copy of the complaint along with supporting documents of such complaint to the Respondent within 7 working days.
- The Respondent shall file a reply to the complaint within 10 working days of receipt of the complaint along with list of documents, names and addresses of witnesses.
- Internal Complaints Committee shall inquire into the complaint in detail and may ask the parties to make their witnesses available to the Internal Complaints Committee.
- Internal Complaint Committee shall have the right to terminate the inquiry or give ex-parte decision on the complaint, if the Respondent or complainant remains absent for 3 consecutive hearings, without sufficient cause.
- The Internal Complaint Committee must complete its investigation within a period of 90 (ninety) days.
- The parties shall not be allowed to bring any legal practitioners to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
- For conducting the inquiry the quorum of the Internal Complaints Committee shall be of 3 (three) members including the presiding officer.
- The Internal Complaints Committee shall, on completion of the inquiry, provide a report of its findings within 10 days from the date of completion of the inquiry and such report shall be made available to the concerned parties- the Complainant & Respondent.

- If the allegation against the Respondent has not been proved, the Internal Complaints Committee may recommend that no action needs to be taken in the matter.
- If the Internal Complaints Committee arrives at the conclusion that the allegation against the Respondent has been proved, it may recommend certain action(s) to Employer such as :
  - Take action for sexual harassment as a misconduct.
  - To get written apology from Respondent to the complainant, issue warning, withholding of promotions / increments of the Respondent, terminating the Respondent.
  - To deduct from salary / wages of the respondent or issue direction for payment; such sum as it may consider appropriate to be paid to the aggrieved person or to their legal heirs, as it may determine.
- Such action shall be taken within 60 (sixty) days of the receipt of report.

#### **8. Punishment for False or Malicious Complaint**

---

If and in case the Internal Complaint Committee comes to a conclusion that the allegation was made with the malicious intent or the aggrieved person or any other person making the complaint on behalf of the aggrieved person produced false or forged or misleading documents to prove his/her case, the Internal Complaint Committee may recommend action to be taken against the aggrieved person or any other person making the complaint, including termination of service. In such a case, malicious intent has to be established after an inquiry, before any action is recommended. A mere inability to substantiate a complaint or provide adequate proof would not attract action as provided herein. A similar recommendation for taking action would be recommended against any witness whom the Internal Complaint Committee concludes, that he/she has given false evidence or produced forged or misleading documents.

It is to be noted that this part of the policy is not intended to discourage woman employee or any other associate from coming forward with any complaints. HLSA recognizes and expects that some claims may be difficult to prove or support, or may not in fact be found to raise to the level of seriousness deemed necessary to constitute Sexual Harassment. These types of complaints will not be considered to be false accusations.

#### **9. Policy Implementation and Review**

---

This policy will be implemented across the organisation and reviewed time to time by the Company's HR department. The Company reserves all the right to amend, abrogate, modify, rescind / reinstate the entire policy or any part of it at any time.