



**SHILP
GRAVURES
LIMITED**

**POLICY FOR PREVENTION OF SEXUAL
HARRASMENT OF WOMEN AT
WORKPLACE**



SHILP GRAVURES LIMITED

I. INTRODUCTION:

The Ministry of Law and Justice, Government of India, formulated THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013, to provide protection against sexual harassment of women at work place and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto. This Act of Parliament received the assent of the President of India on April 22, 2013. This Act has been notified on December 9, 2013, in the Gazette of India, as the date on which the provisions of this Act shall come into force.

II. OBJECTIVE

SGL strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. SGL will not tolerate unlawful discrimination or harassment of any kind. Through enforcement of this policy and by education of employees, SGL will seek to prevent, correct and discipline behaviour that violates this policy.

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

The Company had framed its Policy on Prevention of Sexual Harassment of Women at Workplace and approved by its Board of Directors and had constituted an internal committee for the inquiry and redressal of complaints for matters relating to sexual harassment. The Company has now updated its policy, in line with changes in law and industry practices, for providing greater protection to employees from sexual harassment at Workplace and has launched this Policy on Prevention of Sexual Harassment of Women at Workplace, 2026.



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III. SCOPE

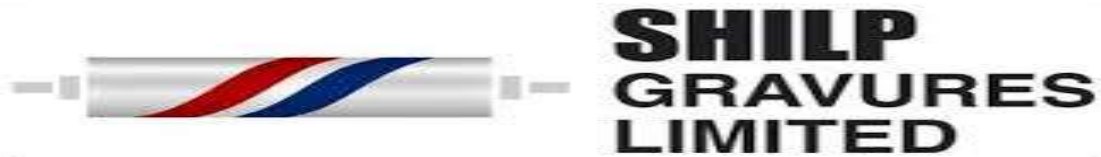
This policy cover complaints by all women employees of the organization irrespective of designation at the workplace as defined in the act of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder (collectively called “POSH Act”).

IV. IMPORTANT DEFINITIONS

- 1) **Sexual Harassment:** “Sexual Harassment” includes any one or more of the following unwelcome acts or behavior, whether directly or by implication, but not limited to:
 - a) Any unwelcome sexually determined behaviour or pattern of conduct, that would cause discomfort and/ or humiliate a person at whom the behaviour or conduct was directed namely:
 - i) Unwelcome sexual advances involving verbal, non-verbal, or physical conduct, whether implicit or explicit;
 - ii) Physical contact and advances including (but not limited to) touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation;
 - iii) Teasing, voyeurism, innuendos and taunts with implicit sexual connotation, physical confinement;
 - iv) Demand or request for sexual favours;
 - v) Sexually coloured remarks or remarks of a sexual nature about a person's clothing or body;
 - vi) Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas;
 - vii) Showing pornography, making or posting vulgar / indecent / sexual pranks, teasing, jokes, demeaning or offensive pictures, cartoons or other materials through email, SMS, MMS, gestures etc.;
 - viii) Repeatedly asking to socialize during off-duty hours or continued expressions of sexual interest;



- ix) Giving gifts or leaving objects that are sexually suggestive;
 - x) Eve teasing, physical confinement against one's will or any such act likely;
 - xi) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- b) An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy. Further, it is important to note that whether harassment has occurred or not does not depend on the intention of the people but on the experience of the Aggrieved Woman.
- 2) **Aggrieved Woman:** "Aggrieved Woman" means, a woman, of any age, whether employed or not, who alleges to have been subjected to any act of Sexual Harassment by the Respondent in the Workplace and includes contractual staffs, temporary staffs, or visitors.
- 3) **Employee:** "Employee" means a person employed at a Workplace for any work on regular, temporary, adhoc or daily wage basis, either directly or by or through an agent, including a contractor, with or without the knowledge of the principal Employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a domestic worker, a co-worker, a contract worker, probationer, trainee, apprentice or by any other name called;
- 4) **Employer:** "Employer" means a person who is responsible for management, supervision and control of the Workplace, for the purpose of this Policy.
- 5) **Workplace:** "Workplace" means:
- a) Company office premises, Company-related activities performed at any other site away from the Company's premises, Company business party or get-to-gather or celebration, Company transit house or guest house or official hotel stay or any other such place, Company vehicle including official tour by air, land, rail or sea, visited by the Employee arising out of, or during and in the course of employment.
 - b) Any social, business or other functions where the conduct or comments may have an adverse impact on the Workplace relations.



- c) Any place visited by the Employee arising out of or during the course of employment including transportation provided by the Company for undertaking such journey.
- 6) Respondent: "Respondent" means a person against whom a complaint of Sexual Harassment has been made by the Complainant.

V. PREVENTION OF SEXUAL HARASSMENT:

1) Preferential Treatment in Employment:

If a woman is promised benefits such as promotion, salary increase, favorable posting, incentives, or other advantages in exchange for accepting unwelcome behavior or advances, it amounts to sexual harassment.

2) Threat of Detrimental Treatment:

If a woman is threatened with negative consequences at work, such as demotion, poor appraisal, transfer, reduction in responsibilities, or disciplinary action for rejecting unwelcome conduct, it is considered sexual harassment.

3) Threat to Present or Future Employment:

Any direct or indirect threat affecting a woman's job security, continuation of employment, promotion opportunities, or future career prospects because of refusal to comply with unwelcome behavior constitutes sexual harassment.

4) Interference with Work or Hostile Environment:

Conduct that disturbs a woman's ability to work peacefully or creates an intimidating, offensive, humiliating, or hostile workplace environment is treated as sexual harassment. This may include inappropriate comments, gestures, jokes, messages, or behavior causing discomfort.

5) Humiliating Treatment Affecting Health or Safety:

Any humiliating, insulting, or abusive treatment that impacts a woman's mental or physical well-being, dignity, health, or safety at the workplace amounts to sexual harassment.



VI. INTERNAL COMMITTEE:

An Internal Committee (“IC”) has been constituted by the Company under the POSH Act to conduct an inquiry and for redressal of a complaint of Sexual Harassment, having the members as listed in Schedule A.

VII. LOGGING AND REGISTRATION OF THE COMPLAINT

- i) A complaint for Sexual Harassment may be made by any Aggrieved Woman who believes she is being sexually harassed or by any person who has knowledge of the incident, with her written consent or her legal heirs, relatives, friends or by any person who has acknowledge of the incident.
- ii) Any of the above, may submit a detailed complaint of the alleged incident of Sexual Harassment in writing or via mail, along with supporting documents, and the names and addresses of the witnesses, to any member of the IC in writing with the Aggrieved Woman’s signature, within 3 months of occurrence of the incident of Sexual Harassment.
- iii) The written complaint should contain the following details: -
 - (a) Name of the alleged offender including designation.
 - (b) Date and location of the alleged incidence of harassment.
 - (c) Details of the incidence.
 - (d) Names of any witnesses or physical or documentary proof in support of the allegation.
 - (e) Should be signed and dated (no anonymous complaints shall be accepted by the committee.
 - (f) Complaint should also contain details like – name, address, contact details, department, of complainant / victim.

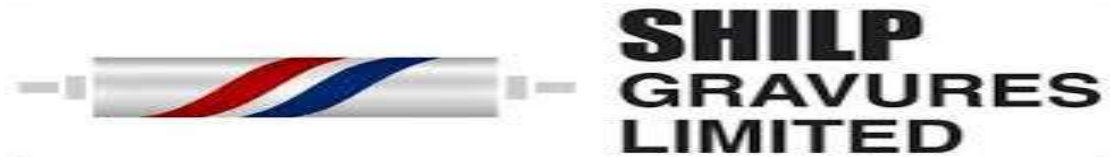


- (g) The Company urges to employees to bring such complaint to the notice of the committee at the earliest.
- (h) The complaint should be submitted preferably within three months from the date of occurrence of the incidence. And all proofs should be kept intact for the inquiry.
- (i) In case where the employee has experienced such harassment during the course of his/her employment, but has left the services of the company, then the Committee shall accept the complaint in writing within three months from date of cessation of employment.

VIII. RESOLUTION

The IC will conduct an detailed inquiry into the complaint lodged in para V(2) and take the following actions:

- i) The IC within 7 (seven) working days of receiving the complaint, shall forward one copy thereof to the Respondent for obtaining a response.
- ii) The Respondent within 10 (ten) working days of receiving the complaint, shall file his reply to the complaint along with list of supporting documents, names and addresses of witnesses.
- iii) The IC shall consider the reply from the Respondent and initiate an inquiry. IC shall hear both the Complainant and the Respondent on date(s) intimated to them in advance and the principles of natural justice will be followed by the IC.
- iv) In the event of failure to attend personal hearing before IC, either by the Complainant or the Respondent, on three consecutive dates (intimated in advance), the IC shall terminate the inquiry proceedings or give an exparte decision, as applicable.



IX. INTERIM RELIEF

On the written or email request by the complaint, the IC may recommend to the Employer to:

- 1) Transfer the Aggrieved Woman or the Respondent to any other Workplace; or
- 2) Grant leave to the Aggrieved Woman of maximum 3 months, in addition to the leave she would be otherwise entitled; or
- 3) Any other recommendation by the IC as appropriate.

X. CONFIDENTIALITY

All complaints and investigations are treated confidentially to the extent possible, and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation, and the IC will take adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department as authorized by IC.

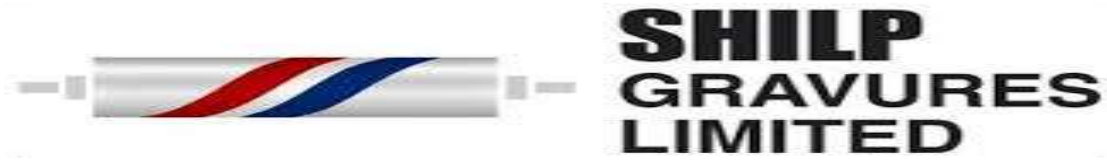
XI. APPEAL

Any person aggrieved by the recommendation of IC may prefer an appeal under the relevant provisions of the POSH Act.



XII. COMPLAINTS MADE WITH A MALICIOUS INTENT:

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual / tarnishing his image in the company and to settle personal/professional scores, strict action will be taken against the complainant amounting to major misconduct. The employees who are victims of sexual harassment may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.



SCHEDULE A – INTERNAL COMMITTEE MEMBERS

The Complaints Committee has been formed consisting of the following:

Name of the Member	Designation
Mrs. Garima Pandey	Chairperson/Presiding Officer
Ms. Zinal Parikh	Member
Mr. Ambar Patel	Member
Mr. Shailesh Desai	Member

A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Chairperson, at least two members, one of whom shall be a lady.

Important Notes: -

1. If the committee member representing the category of defendant is junior in hierarchy to the defendant then for that particular enquiry that member shall be substituted by another person who is senior in rank to the defendant.
2. Any person who is a committee member and if charged with sexual harassment will have to step down as member during the enquiry into the complaint.
3. Changes in the Members of the Committee, whenever necessary, shall be made by the competent authority.