



MACHINO PLASTICS LTD.

Leaders in Automotive Plastic Parts



POLICY ON PREVENTION OF SEXUAL HARESSMENT (POSH) at Workplace

Machino Plastics Limited

Policy on Prevention Of Sexual Harassment (Posh) At Workplace

1. Commitment:

Our company is committed to providing a safe, secure, and respectful work environment free from sexual harassment. This policy outlines our zero-tolerance stance towards sexual harassment at the workplace and complies with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and rules framed thereunder being the Sexual Harassment of women at workplace (hereinafter referred to as “Act”).

2. Objective

The objective of this policy is creating and maintaining a secure work environment where it's employees, agents, vendor and partners can work and pursue business together in an atmosphere free of any harassment, exploitation and intimidation caused by acts of Sexual Harassment within but not limited to the office premises and other locations directly related to the company's business for the prevention and redressal of complaints of sexual harassment and for matters connected therewith. Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

3. Scope

The policy is with respect to Prevention, Prohibition & Redressal of Sexual Harassment which may arise in places not limited to geographical location viz. company's offices/branches but includes all such places or locations where acts are conducted in context of working relationships or whilst fulfilling professional duties or which may be visited by an employee during the course of employment.

This policy is applicable to:

- All employees (permanent, temporary, contract, interns)
 - Clients, vendors, consultants, visitors, supervisors, Agents, Customers, Partners
 - All company premises, including off-site locations and virtual workspaces
 - Any person interacting with the company in a professional capacity
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4. Definition

a. “**Aggrieved Woman**” means a person in relation to work place whether employed or not, who alleges to have been subject to any act of sexual harassment by the Respondent.

b. **“Employee”** means a person employed at a workplace for any work on regular, temporary, adhoc or daily wages basis, either directly 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 expressed or implied and includes co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name;

c. **“Internal Complaints Committee”** means a committee constituted by the Company as per this policy.

d. **“Respondent”** means a person against whom the aggrieved woman has made a complaint.

e. **“Sexual Harassment”** includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

- i. Physical contact and advances; or
- ii. A demand or request for sexual favour; or
- iii. Making sexually colored remarks; or
- iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or
- v. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
- vi. Double meaning language profanity.
- vii. Sending inappropriate or offensive messages, pictures, or videos via email, chat, or social media platforms;
- viii. Repeated unwanted social invitations or persistent unwelcome attention

When any of these acts are committed in circumstances where the victim of such conduct has a reasonable apprehension that such conduct can be humiliating and may constitute violation of privacy, health and safety problem.

It would constitute sexual harassment where a woman has reasonable ground to believe that her objections would disadvantage her in connection with her employment or work including recruitment or promotion or when it creates a hostile work environment and adverse consequences might occur if the victim does not consent to the conduct in question or raises any objection thereto.

f. **Quid Pro Quo ("This for That")** includes the following circumstances, among others, if they occur or are present in relation to, or connected with, any act or behavior with sexual connotation, amount to sexual harassment:

- Implied or explicit promise of preferential or detrimental treatment in employment.
- Implied or explicit threat regarding present or future employment status.

g. “**Workplace**” includes any department, organization, undertaking, establishment, enterprise institution, and office or branch unit. Any place visited by the employee arising out of or during the course of employment.

5. Internal Complaints Committee (ICC)

Every complaint received shall be forwarded to internal complaints committee formed under the policy for redressal. The investigation shall be carried out by Internal Complaints Committee constituted for this purpose.

Internal Complaints Committee has been constituted of the following members as nominated by the company:

- (a) a Presiding Officer who shall be a woman employed at a senior level at workplace from amongst the employees:

Provided that in case a senior level woman employee is not available, the Presiding Officer shall be nominated from other offices or administrative units of the workplace referred to in sub-section (1):

Provided further that in case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organisation;

- (b) not less than two Members from amongst employees preferably committed to the cause of women or who have had experience in social work or have legal knowledge;
- (c) one member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment:

Provided that at least one-half of the total Members so nominated shall be women.

The ICC will have a minimum of four members, and their names, email addresses, and contact numbers will be displayed at all company establishments.

The Presiding Officer and every Member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination as may be specified by the employer.

6. Complaint Redressal Mechanism/Redressal Process

Any aggrieved women may make, in writing, a complaint of sexual harassment at workplace to the committee giving details of the sexual harassment meted out to her within a period of 3 months from the date of incident, and in case of a series of incidents, within a period of 3 months from the date of last incident.

1. The Presiding officer or any Member of the Internal Compliant committee can render reasonable assistance to the person for making complaint in writing, in case they are unable to do so.
2. On the receipt of compliant, the Internal Compliant Committee shall decide the place and time for hearing the complaint and shall intimate the date, time and place of hearing to the complainant and respondent. The Internal Complaints Committee shall follow principle of Natural justice while handling such complaints.
3. Where the aggrieved woman is unable to make a compliant on account of their physical incapacity, a complaint may be filed by:
 - a. a relative or friend; or
 - b. a co-worker; or
 - c. an officer of the National Commission for Women or State Women's Commission; or
 - d. any person who has knowledge of the incident, with the written consent of the aggrieved woman.
4. The complainant or person authorized on their behalf as per above provision, shall make a compliant to the Internal Complaints Committee through following mode:
 - a. Copy of complaint shall be sent to Internal Complaints Committee at sec.legalggn@machino.com or Presiding Officer/any other member of Internal Complaints Committee – Plot No. 3, Maruti Joint Venture Complex, Udyog Vihar, Phase-IV, Gurugram-122015.
 - b. On receipt of such compliant, Internal Complaints Committee shall provide a copy to the Respondent within 7 working days.
 - c. Respondent shall file reply within 10 working days of receipt of the complaint.
 - d. Internal Complaints Committee shall investigate in details into the matter of the complaint. The Internal Complaints committee shall have the right to call the person against whom the complaint is made or any other witnesses as when necessary.
 - e. The Internal Committee must complete its investigation within a period 90 days.
 - f. The parties shall not be allowed to bring any legal practitioner to represent them in their case at any stage of the proceedings before the Internal Complaints Committee.
5. The Internal Committee may before initiate an inquiry, and at the aggrieved woman's request, attempt to settle the matter through conciliation. However, Internal Complaints Committee shall ensure that:
 - a. Monetary settlement will not be make as a basis of conciliation.
 - b. Where a settlement has been arrived, the settlement terms shall be signed by both the parties and shall be provided with a copy of it.

6. The Internal Complaints Committee may during such investigation, exercise the power of a civil court, vested in it, in respect of:
 - a. Summoning the enforcing the attendance of any person and examining him under oath;
 - b. Requiring discovering and production of documents;
 - c. Any other prescribed matter.
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7. Disciplinary Action

Depending on the severity of the misconduct, actions may include:

1. The initial findings before completion of the inquiry however have to be shared with the concerned parties.
 2. If the allegation against the respondent has not been proved, the committee may recommend that no action needs to be taken in the matter.
 3. If the Internal Complaints Committee arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to:
 - a. Take action for sexual harassment as a misconduct.
 - b. To tender written apology to the complainant, issue warning, withholding of promotions/increment of the respondent, Transfer or change of duties, Legal action, terminating the respondent etc.
 - c. 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 woman or to their legal heirs, as it may be determine.
 - d. Any other action as deemed appropriate and approved by Internal Complaints Committee.
 4. Such action will be taken within 60 day of the receipt of report.
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8. Protection Against Retaliation

No employee shall face retaliation for reporting or assisting in the investigation of a sexual harassment complaint.

9. Awareness & Training

- Mandatory POSH training sessions annually
 - Regular workshops and sensitization programs
 - Display of this policy at prominent places
1. All the employees, agents, customers, vendors, partners and visitor shall have access to this policy at any given point of time and clarification related to this policy shall be addressed by the HR team.
 2. A brief shall be given to all existing employees regarding the features of this policy immediately on formulation of the policy and to new employees during their Induction.
 3. Company shall display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.
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10. False Accusations

1. The complaint of sexual harassment made by any employee shall be taken up with utmost seriousness by the Company. However, there shall be zero tolerance for any false accusation.
 2. If the Internal Complaints Committee comes to a conclusion that the allegation was made with malicious intent or the aggrieved woman or any other person making the complaint on behalf of the aggrieved woman produced false or forged or misleading documents to prove her case, the Internal Complaints Committee may recommend action to be taken against the person who has made the complaint. In such a case, malicious intent has to be established after an inquiry, before any action is recommended.
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11. Review and Updates

- This policy shall be reviewed annually or as required and updated to remain compliant with applicable laws.
 - The Internal Complaints Committee shall prepare an annual report with the following details and shall submit the same to the company to include in its Annual report:
 - a. Number of complaints of sexual harassment received during the year
 - b. Number of complaints disposed off during the year
 - c. Number of cases pending for more than 90 days
 - d. Number of workshops or awareness program against sexual harassment carried out;
 - e. Nature of action taken by the employer.
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12. Confidentiality and Non-Retaliation

Every person involved in the complaint process shall maintain strict confidentiality regarding the complaint, including the identity of the complainant, respondent, and witnesses, as well as any information related to conciliation, inquiry, or Committee recommendations.

The Company maintains a zero-tolerance policy towards retaliation or victimization of any person who raises concerns or participates in proceedings related to any form of harassment or discrimination. Any breach of confidentiality will be treated as a serious violation and may attract disciplinary action as per applicable laws and company protocols.

13. Conclusion

Complaints relating to Sexual Harassment shall be handled and investigations will be conducted under the principals of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behaviour. All efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any resource that company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the complaint and/or the company to pursue, nor shall they be precluded from pursuing this further and other legal actions as may be available.

14. Reporting Channels

For any queries, clarifications, or to report an incident, employees may reach out via any of the following:

- **Email:** Sec.legalggn@machino.com
- **Write to:** Sandhya Kumari {03-Maruti J.V. Complex, Udyog Vihar, Phase IV, Gurugram, Pin -122015}.
- **Call on:** [0124-2341218, 2340806]

ANNEXURE A

Members of Internal Committee

Gurugram (Plant)		
Sl. No.	ICC Member	Responsibility
1.	*Ms. Sandhya Kumari	Presiding Officer
2.	Mrs. Shashi Bala Jha	External Member
3.	Mrs. Sarita Jindal	Member
4.	Mrs. Reetika Pant	Member
5.	Mr. Pawan Raghav	Member

* Ms. Sandhya Kumari has been appointed as the Presiding Officer in board meeting held on 14th August, 2025

Manesar (Plant)		
Sl. No.	ICC Member	Responsibility
1.	Ms. Devanshi bansal	Presiding Officer
2.	Mrs. Shashi Bala Jha	External Member
3.	Ms. Diksha	Member
4.	Ms. Anu	Member
5.	Mr. Raj Kumar	Member

-----This policy has been revised w.e.f. 14th August, 2025-----