

POSH Policy (Prevention of Sexual Harassment at Workplace)

1. Objective

Nell Infotech Pvt. Ltd. is committed to providing a safe, secure, and respectful workplace for all employees. This policy aims to prevent, prohibit, and redress sexual harassment at the workplace in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013**.

2. Scope

This policy applies to:

- All employees (permanent, contractual, consultants, interns)
 - All genders (though the Act primarily protects women, the company promotes a respectful workplace for all)
 - All work-related environments, including:
 - Office premises
 - Client locations
 - Work-from-home scenarios
 - Business travel, meetings, and events
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3. Definition of Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour (direct or implied), such as:

- Physical contact and advances
- Demand or request for sexual favours
- Making sexually colored remarks
- Showing pornography
- Any unwelcome physical, verbal, or non-verbal conduct of a sexual nature

Examples:

- Inappropriate comments, jokes, or messages
 - Unwanted touching
 - Repeated requests for dates despite refusal
 - Sharing explicit content
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4. Internal Complaints Committee (ICC)

As per the Act, an ICC must be constituted if there are 10 or more employees.

ICC Composition:

- **Presiding Officer (Woman Employee – Senior Level)**
- **At least 2 Employee Members**
- **1 External Member** (NGO/Legal Expert familiar with POSH)

(Note: You must appoint an external member mandatorily.)

5. Complaint Mechanism

- Any aggrieved woman may file a written complaint within **3 months** of the incident
 - Complaint can be submitted via:
 - Email to ICC
 - Written submission to HR/ICC member
 - If the complainant is unable to write, assistance will be provided
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6. Inquiry Process

- The ICC will initiate inquiry within **7 working days**
 - Both parties will be given a fair opportunity to be heard
 - Inquiry to be completed within **90 days**
 - Report submission within **10 days** after completion
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7. Interim Relief (if required)

During the inquiry, the complainant may request:

- Transfer (self or respondent)
 - Leave up to 3 months
 - Work-from-home option
 - Any other relief deemed appropriate
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8. Action & Disciplinary Measures

If allegations are proven, actions may include:

- Written apology
 - Warning or reprimand
 - Salary deduction
 - Suspension or termination
 - Counselling or training
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9. False Complaints

- Malicious complaints may attract disciplinary action
 - However, the inability to prove a complaint does not mean it is false
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10. Confidentiality

- All complaints, proceedings, and identities will be kept strictly confidential
 - Breach of confidentiality may lead to disciplinary action
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11. Awareness & Training

- Regular POSH awareness sessions will be conducted
 - Employees will be educated on rights and responsibilities
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12. Responsibilities

Employer Responsibilities:

- Provide a safe working environment
- Constitute ICC
- Conduct awareness programs
- Ensure timely redressal

Employee Responsibilities:

- Maintain respectful behaviour
- Avoid harassment
- Cooperate in investigations

13. Non-Retaliation

No employee shall face retaliation for:

- Filing a complaint
- Participating in inquiry

14. Policy Review

This policy will be reviewed periodically to ensure compliance with legal requirements.

15. Conclusion

Nell Infotech Pvt. Ltd. adopts a **zero-tolerance approach** toward sexual harassment and is committed to creating a dignified workplace for all.

Internal Complaints Committee (ICC)

The members of the Committee are as follows

Sr. No	Name	Designation	
1	Manisha Jadhav	Compliance Officer	
2	Dipti Kadam	HR Manager	
3	Nilesh Mhatre	POSH Certified Consultant	