



SURAKSHA DIAGNOSTIC LIMITED

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)



I. INTRODUCTION:

This Policy has been framed in accordance with the provisions of “The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013” and Rules framed thereunder. The Policy covers all the key aspects of the said Act and the Rules and for any clarification reference shall always be made to the said Act and the Rules and the provisions of the said Act and the Rules shall prevail. This policy has been re-adopted by the Board of Directors of the Company in its meeting held on 20-12-2023 and the IC Committee was reconstituted on 08-02-2025, 07-12-2025 and 05-02-2026.

II. COMMITMENT

Our Company is committed to provide work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment.

III. SCOPE

This policy applies to all categories of employees of the Company, including permanent management and workmen, temporaries, apprentice/trainees and employees on contract at their workplace or at clients' sites. The Company will not tolerate sexual harassment, if engaged by any co- employee/ officer, executive officers of the Company or outsider while on office duty.

The workplace includes:

1. All offices or other premises where the Company's business is conducted.
2. All company-related activities performed at any other site away from the Company's premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

IV. DEFINITIONS

- a) **Complainant**- In relation to a workplace, any aggrieved person, whether employed or not, who alleges to have been subjected to an act of sexual harassment.
- b) **Employee**- Means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of a principal employer, whether the terms of employment are express or implied and includes a co-worker, probationer, trainee, apprentice or called by any other such name;
- c) **Internal Committee**- Internal Committee (IC) means an internal complaints committee constituted under this policy
- d) **Sexual harassment** -may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or any other verbal or physical conduct of sexual nature.

Sexual Harassment at the workplace includes:

- 1. Unwelcome sexual advances (verbal, written or physical),
- 2. Demand or request for sexual favours,
- 3. Any other type of sexually-oriented conduct,
- 4. Verbal abuse or 'joking' that is sex-oriented,
- 5. any conduct that has the purpose or the effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.

Sexual harassment is emotionally abusive and creates an unhealthy, unproductive atmosphere at the workplace. Sexual harassment cases can be classified into two categories – quid pro quo and creation of a hostile working environment.

a. Under the quid pro quo (meaning this for that) form of harassment, a person or authority, usually the superior of the victim, demands sexual favours for getting or keeping a job benefit and threatens to fire the employee if the conditions are not met.

b. A hostile work environment arises when a co-worker or supervisor creates a work environment through verbal or physical conduct that interferes with another co-worker's job performance or creates the workplace atmosphere which is intimidating, hostile, offensive or humiliating and experienced as an attack on personal dignity. For example an employee tells



offensive jokes. No person shall indulge or caused to be indulged under instructions from superior in sexual harassment of co- workers.

- e) **Workplace**- Includes any place visited by the employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey.

V. RESPONSIBILITIES REGARDING SEXUAL HARASSMENT

It is duty/ responsibility of all the employees in the Company to prevent or deter the commission of acts of sexual harassment and to provide the procedures for the resolution, settlement or prosecution of acts of sexual harassment by taking all steps required as stipulated in the policy. The management and employees have the mutual responsibility to ensure that the working environment remains clean and free from all forms of harassment. Collectively we also have the duty to report all cases of harassment to the Human Resources Department, should this behaviour be witnessed by any employee, direct or indirect at any time in the workplace. Management (including Assistant Managers and Team Leaders) has a particular duty to ensure that harassment does not occur in areas, which are under their charge.

VI. COMPLAINT / GRIEVANCE MECHANISM

An appropriate complaint mechanism in the form of “Internal Committee” has been created in the Company for time-bound redressal of the complaint made by the victim. A complaint shall be submitted in writing to sangeeta@surakshanet.com or mamta.jain@surakshanet.com or to 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.

VII. INTERNAL COMMITTEE (IC)

The “Internal Committee” shall consist of the following members:

- 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

- 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 tenure of the committee shall be not exceeding 3 years & names of the committee members shall be announced by the Human Resource Manager. The Executive Director shall be the authority for disciplinary actions on issues relating to sexual harassment at the workplace, as per the following norms. The Committee member details are given in Annexure-1.

a. It is the duty of the Committee to render first care if necessary and provide support with regard to any complaint of sexual harassment. In addition, the Committee will provide assistance to the complainant when required.

b. It is the responsibility of the Human Resource Manager to display the full details of committee Members on the Company Notice Board to make people aware of the female rights in this regard and also to make the offenders aware of the consequences of such act, if committed.

c. It is also responsibility of the Human Resource Manager to forward such complaints to the Committee where-ever necessary on a case to case basis.

d. The IC shall also in each calendar year prepare an annual report and submit the same to the district officer and/or any authority designated as may be prescribed under the relevant law.

VIII. DEALING WITH THE COMPLAINT

Given that this policy highlights a prevention focus, there is a need to distinguish between an informal and formal process.

IX. PROCEDURE FOR INFORMAL GRIEVANCE REDRESSAL

Informal processes normally involve an intermediary means for resolving a problem. In the case of Sexual Harassment, at first instance, the person (i.e. HOD / Woman representative of the location) may be the point of first contact for anyone seeking informal support/ intervention to stop unwelcome behaviour. A sense of restraint and responsibility on the part of all concerned is critical for the effective functioning of these guidelines. The preventive/ informal process that can be adopted is as follows:

- a. Convey to the person who is the cause of distress, about what person's actions, words, behaviour is doing and convey in no uncertain terms that such behaviour is not appreciated. What is important is the "Way" a particular behaviour, action or word is perceived; "Intent" is of no consequence.

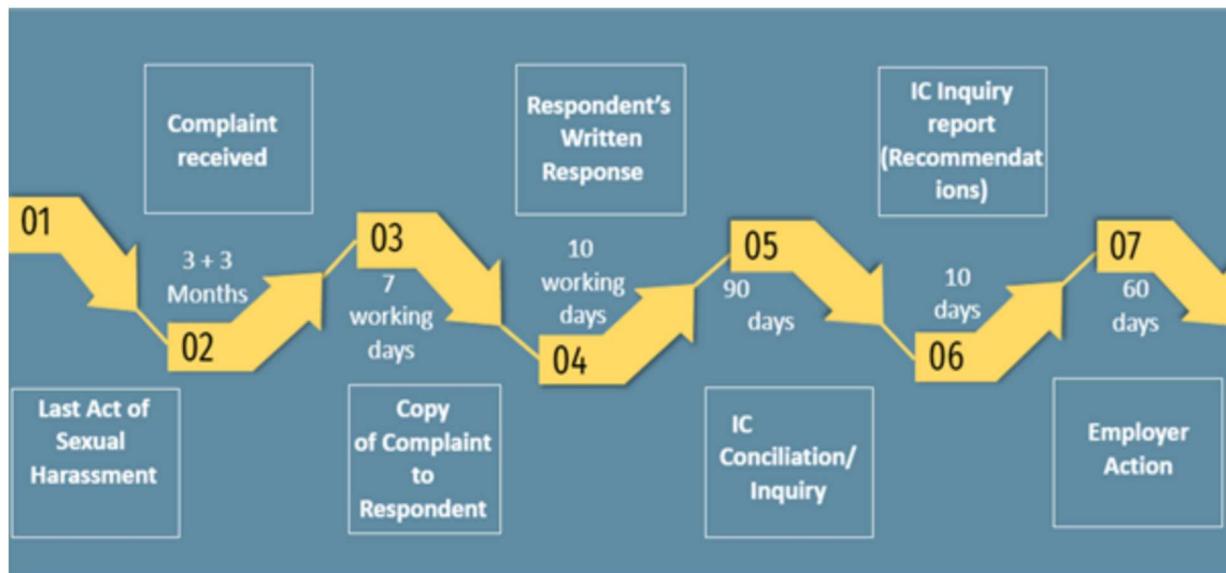
- b. The second step would be to approach someone within the Company – preferably your Superior or HR Representative. The Superior or HR Representative would then try and counsel/ talk it over with a view towards closing the matter amicably.
- c. In any case all such incidents along with the resolution need to be reported to the Head of HR who will then provide a short report to the Internal Committee and the matter will be disclosed.
- d. However, in the event of if not being resolved, then it would need to be escalated to the Internal Committee.

X. PROCEDURE FOR FORMAL GRIEVANCE REDRESSAL

In the event of the complaint not being resolved through informal mechanism, then it would need to be escalated to the Internal Committee for redressal.

- a. It is the obligation of all employees to report sexual harassment experienced by them personally. A concerned co- worker may also inform the Complaints Committee of any instance or behavior of sexual harassment by a co- worker towards another employee.
- b. The concerned employee shall give his complaint in writing to any of the committee member giving details of the incidence within a week of its occurrence.
- c. Once the complaint is received, it will be kept strictly confidential.
- d. The person accused will be informed that a complaint has been filed against him/ her and no unfair acts of retaliation or unethical action will be tolerated. The Committee shall ensure that affair and just investigation is undertaken immediately.
- e. Both the complainant and the alleged accused initially will be questioned separately with a view to ascertain the veracity of their contentions If required, the person who has been named as a witness will need to provide the necessary information to assist in resolving the matter satisfactorily.
- f. The Chairperson after studying the report & discussion with the Committee members shall submit her recommendation to the Executive Director within 10 days of completing the inquiry.
- g. The complainant and the accused shall be informed of the outcome of the investigation. The investigation shall be completed within 3 months of the receipt of complaint. If the investigation reveals that the complainant has been sexually harassed as

claimed, the accused will be disciplined accordingly. The implementation of the recommendation of Internal Committee by Executive Director should be done within 30 days of receipt of such recommendation.



XI. DISCIPLINARY ACTION

Where any misconduct is found by the Committee, appropriate disciplinary action shall be taken against accused. Disciplinary action may include transfer, withholding promotion, suspension or even dismissal. This action shall be in addition to any legal recourse sought by the complainant.

XII. CONFIDENTIALITY

The Company understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the accused person and others who may report incidents of sexual harassment, confidentiality will be maintained throughout the investigatory process to the extent practicable and appropriate under the circumstances.

XIII. ACCESS TO REPORTS AND DOCUMENTS

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

XIV. PROTECTION TO COMPLAINANT / VICTIM

The Company is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

XV. LODGING A FALSE COMPLAINT

a. If, based on investigations, the Company arrives at the conclusion that a *prima facie* case of harassment has not been made out against an employee and that the charges were brought falsely, and with malicious intent the company will initiate appropriate disciplinary action which may include termination of the employee who falsely accuse another in accordance with the Company's Disciplinary procedures. Provided however a mere inability to substantiate the complaint or provide adequate proof will not amount to a false complaint.

b. All records of sexual harassment reports and investigation shall be considered confidential and shall not be disclosed publicly except to the extent required by law.

XVI. THIRD PARTY HARASSMENT

When sexual harassment occurs because of an act or omission by any third party or outsider, the Company will take steps necessary to assist the affected employee in terms of support and prevention action within the legal norms.

XVII. OBLIGATION OF THE IC

The responsibility of the IC will be to deploy the Policy process, receive all complaints, and submit enquiry findings and verdict to the CHRO. IC shall ensure that the enquiries are conducted in a confidential manner and that the identity of the parties to the enquiry including witnesses is kept confidential. Additionally, it shall ensure that fair and just procedures are followed at all stages of the enquiry. IC shall uphold principles of Natural Justice and take all such reasonable steps that may be necessary to prevent Retaliation/victimization. IC shall also ensure that the enquiries are conducted in a professional and objective manner. IC shall make all appropriate recordings of each enquiry sitting.

XVIII. OBLIGATION OF THE EMPLOYEES

Employees are required to familiarize themselves with the policy. Employees shall not commit any acts which amount to sexual harassment at the workplace. Employees shall report incidents of sexual harassment without fear or favor.

XIX. PUNITIVE ACTION

If the alleged aggressor is found guilty of Sexual Harassment, the same shall be treated as Misconduct as per the Company Policy. The punitive action recommended by the IC shall be commensurate with the severity of the Sexual Harassment. The punitive action will be limited to the following actions:

- ✓ Warning Letter
- ✓ Written Apology from Offender
- ✓ Transfer
- ✓ Debarring from supervisory duties
- ✓ Denial of employee benefits like increments/promotion/salary correction etc
- ✓ Cancellation of specific work Assignment Suspension
- ✓ Dismissal

The factors to be considered in determining the punitive action:

- ✓ The mental trauma, pain, suffering and emotional distress caused to the aggrieved person;
- ✓ The loss in the career opportunity due to the incident of sexual harassment;
- ✓ Medical expenses incurred by the victim for physical or psychiatric treatment;
- ✓ The income and financial status of the respondent;
- ✓ Feasibility of such payment in lump sum or in instalments.

XX. CONCLUSION

In conclusion, the Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity and respect.

Approved
By and on behalf of Board of Directors
Suraksha Diagnostic Limited

Sd/-
Director

ANNEXURE-1

COMPOSITION OF INTERNAL COMMITTEE (IC)

Sl. No.	Name of the Member	Presiding Officer/Members
1	Sangeeta Chakraborty (Senior female employee)	Presiding Officer
2	Pradipta Kanungo (External member)	Member
3	Niren Kaul (Senior male employee)	Member
4	Mamta Jain (Senior female employee)	Member
5	Ms Santa Das-Clinic Manager	Member