




PREVENTION OF SEXUAL HARASSMENT POLICY

ABSTRACT

Communicating culture of the organization and intention of implementing Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 at SFC

SFC HR Team

Ver No.	Change Description	Prepared By	Reviewed By	Approved By	Date
1.0	Prevention of Sexual Harassment Policy	SFC HR 	CEO 	Managing Director 	August 2025

Contents

1.	Objective	3
2.	Scope of the policy and effective date	3
3.	Important definitions	4
3.1	Sexual harassment	4
3.2	Virtual Sexual harassment	5
3.3	Internal committee (IC)	5
3.4	Aggrieved woman	6
3.5	Workplace	7
3.6	Employee	7
3.7	New normal	8
4.	Redressal mechanism	8
5.	Disciplinary actions	9
6.	False and malicious complaints	10
7.	Appeal	10
8.	Confidentiality	10
9.	Training and sensitization	11
10.	Employer to ensure compliance	11

1. Objective

SFC Environmental Technologies Limited (hereinafter referred to as the “Company”) is dedicated towards fostering a safe, respectful and sexual harassment free working environment for all our women employees. The Company is committed to empower its employees with a secure and supportive atmosphere.

The Company shall take immediate disciplinary or legal actions, as the case may be, against any problem of sexual harassment reported at the workplace. This Policy is applicable across the Company in all its workplaces.

This Policy is meant to:

- protect fundamental rights;
- educate about conducts that will / may constitute to sexual harassment at workplace;
- prohibit, prevent or deter the commission of acts of sexual harassment at workplace; and
- provide all the required support to the victim.

2. Scope of the policy AND effective date

The Company has adopted this policy to comply with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (hereinafter referred to as the ‘Act”) and rules thereunder.

The policy shall extend to all the women employees associated with the Company defined under point no. 3.6 of this policy. The scope of the policy shall not apply to the clients, third parties and outsiders engaged with the Company in any capacity.

In order to determine any act of sexual harassment at workplace and to get covered under the scope of the policy, all such acts of sexual harassment must have taken place because of work or work relations and during the course of employment / engagement with the Company.

The revised policy shall come into force with an immediate effect.

All employees in addition to the Internal Committee members may also reach out to Ms. Pranali Borwankar, HR Representative for raising any concerns.

3. Important definitions

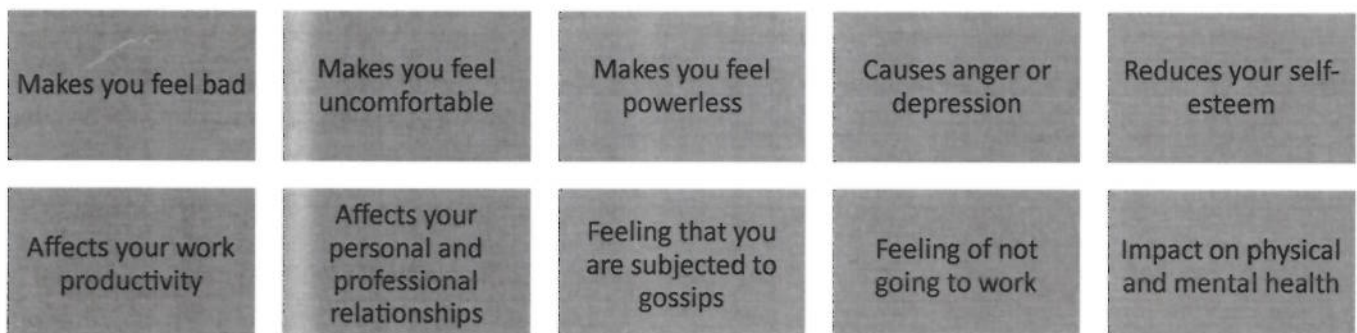
3.1 Sexual harassment

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

1. Physical contact or advances;
2. A demand or request for sexual favours;
3. Making sexually coloured remarks;
4. Showing pornography;
5. Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

**In addition to the aforementioned, any form of verbal, physical, virtual, written, graphic or emotional harassment shall be considered as sexual harassment, if the same is identified to be sexual in nature and shall be liable to disciplinary actions under the policy and the Act.*

In order to get clarity and easily interpret the term sexual harassment, employees must assess the unwelcome act or behaviour considering the following feelings:



Sexual harassment can be broadly identified in two primary categories:

- **Quid Pro Quo:** Quid Pro Quo is a type of sexual harassment which occurs when the supervisor requires sexual favours from subordinates or employees to get the work done.
Example: A supervisor requesting for sexual favours as a condition of hiring, promotion, salary hike etc.
- **Hostile Work Environment:** Hostile work environment harassment occurs when there are frequent unwelcome comments based on sex, race, caste, personal affairs, disability, age, religion, body, offensive gender related comments etc. which affects the work performance of employees and create a hostile or unfriendly work environment. It is not only limited to the mentioned examples, rather may extend to any activity that obstructs people from doing their routine jobs and makes them uncomfortable at workplace.

Example: Body shaming a person, making sexually coloured remarks, sharing inappropriate images, stalking, staring inappropriately etc.

General Illustrations of Sexual Harassment at Workplace:

- Sexually coloured offensive comments or jokes
- Threats or intimidation or retaliation against employees who speak up against problems of sexual harassment at workplace
- Threats and intimidation in order to get sexual favours
- Staring inappropriately
- Passing sexually coloured comments on person's body or physical appearance
- Using abusive language amounting to a vulgar meaning
- Displaying sexually offensive/ explicit pictures
- Touching a person inappropriately
- Invasion of personal space like brushing against or cornering someone physically or with a sexually coloured remark / comment
- Stalking an individual with a sexual intent – physically or via online modes
- Abuse of authority or power to threaten a person's job or undermine her performance against sexual favours
- Falsely accusing and undermining a person behind closed doors for sexual favours
- Controlling a person's reputation by rumour-mongering about the person's private life
- And more

**The act of sexual harassment may be a single incident or a continuous unwelcome behavior.*

3.2 Virtual Sexual harassment

Any unwelcome and sexually coloured correspondence, messages, inappropriate jokes, audio or video recordings sent through any electronic means or social media platforms like WhatsApp, LinkedIn, Email, Instagram and more, will amount to sexual harassment in the virtual workplace and the same will be treated as sexual harassment under the policy.

Illustrations:

- Display of obscene or vulgar background pictures while the video meeting is on
- Taking screenshots or recordings during the virtual meeting without permission
- Following inappropriate dress codes during video meetings, making colleagues feel uncomfortable
- Sending inappropriate emojis via electronic media platforms
- Stalking on social media with a sexual intent and more

3.3 internal committee (IC)

The Company has duly constituted an Internal Committee to provide comfort to the employees and foster regular communication for voicing concerns.

As per the Act, the IC shall be treated as an independent body constituted to ensure transparency and non-biasness.

In case of any complaint of the act of sexual harassment against any member of the Board or management, the Presiding Officer of the IC shall immediately inform the same to the Local Committee constituted to handle such cases within the Company's jurisdiction.

A detailed list of Internal Committee members is provided in **Annexure A**.

Roles and Responsibilities:

IC being the sole designated authority constituted to deal with the problems of sexual harassment at workplace, their primary role shall be to ensure a safe and inclusive workplace culture. In addition, IC shall also be responsible for-

- Meeting at regular intervals to discuss proactive measures and monitoring implementation of the Act in letter as well as in spirit;
- Receiving and acknowledging the complaint received;
- Comforting the parties involved i.e. the complainant and the accused (respondent);
- Investigating every complaint of sexual harassment in the best possible manner and act impartially, giving both the parties an opportunity of being heard and considering their rights under the Act;
- Organizing and conducting awareness programs at regular intervals for sensitizing employees as well as the Board of the Company;
- Timely submitting desired reports to the Board / District Officer;
- Extending complete support to the aggrieved person or the Complainant during the entire process of investigation and thereafter to make them feel comfortable;
- Extending complete support to the complainant to file complaint with the police (FIR) at any given point of time;
- Maintaining and ensuring confidentiality of any complaint received and investigations made;
- Discouraging retaliation and gossips and;
- Nurturing mental health of the stakeholders.

3.4 Aggrieved woman

An Aggrieved Woman, in relation to a workplace, is a person, of any age, whether an Employee or not, who alleges to have been subjected to any act of Sexual Harassment.

Rights of Aggrieved Woman or Complainant:

- Right to a compassionate and supportive behaviour from the IC;
- Right to receive a copy of statement along with all the evidence and a list of witnesses submitted by the respondent;
- Right to confidentiality throughout the process;
- Right to receive complete support from the employer and IC in case if they choose to lodge FIR;
- Right to transfer, leave or change in reporting line during the pendency of inquiry;
- Right to appeal in case not satisfied with the findings or recommendations of IC.

Rights of the Respondent or Accused:

- Right to receive a copy of the statement along with all the evidence and list of witnesses submitted by the Complainant;
- Right to confidentiality throughout the process;

- Right to transfer to any other branch, unit, office during the pendency of inquiry;
- Right to appeal in case not satisfied with the findings or recommendations of IC;
- In case of false and malicious complaint filed by the Complainant, complete support and adequate resources should be made available to the respondent by IC and the Board.

Note:

- **Complainant / Victim - the Aggrieved Woman who makes a Complaint alleging Sexual Harassment under this Policy and;**
- **Respondent / Accused - A person against whom a complaint of sexual harassment has been made by the Aggrieved Person under this policy.**

3.5 Workplace

Workplace of the Company shall include office of the Company located at 2201–2202, Rupa Renaissance, D-33, Turbhe MIDC Road, TTC Industrial Area, MIDC Industrial Area, Thane, Maharashtra – 400705.

In addition to the aforementioned, workplace shall also include the following:

- Office parties – onsite and off-site;
- Training programs / meet-ups / any such programs organized by the Company – onsite and off-site;
- Virtual or remote workplaces chosen to work because of work and during the course of employment for discharging company's work
- Any place visited by the employee because of work and during the course of employment for discharging company's work and shall also include transportation provided by the Employer for undertaking such journey.

3.6 Employee

Employee shall mean any woman employed by the Company. A woman employee may engage with the Company as:

- Regular worker
- Temporary, ad hoc or daily wage worker
- Co-worker
- Probationer
- Trainee
- Apprentice

3.7 New Normal

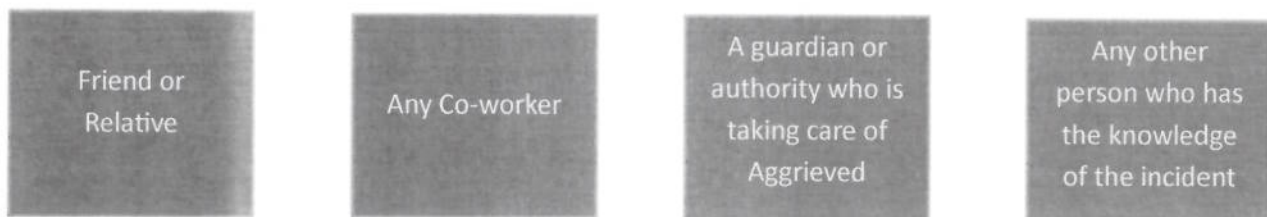
In order to ensure effective implementation of this policy, the Company must encourage open communication and maintain the following decorum to encourage an enabling workplace environment -

- maintain professional timings or working hours;
- intimate in advance of any video conference or meeting;
- mention proper dress codes to be followed while attending virtual / physical meetings and
- Adhere to social media etiquettes.

4. Redressal Mechanism

The Complainant or Aggrieved Woman shall make a complaint in writing (handwritten or email) to the Company IC within 3 (three) months from the date of the incident or within 3 (three) months from the date of the last incident in case of a series of incidences. The IC may extend the limit of filing the complaint to another 3 (three) months, if it is satisfied that the circumstances were such which prevented the person from filing a complaint within the said period. Format to file a written complaint is provided in **Annexure B**.

In case if the Complainant or Aggrieved Woman is unable to file a complaint, following people on behalf of the Complainant or Aggrieved Woman and with their written consent, can file the complaint with IC within the above-mentioned time frame:



Note:

- In case of any difficulty in filing the Complaint in writing, the Presiding Officer/Member of the IC shall provide reasonable assistance to the Complainant to file a written Complaint.

Note: The Internal Committee will always maintain transparency and follow the principle of natural justice by giving an opportunity of being heard to both the parties involved, without any bias.

IC shall initiate formal inquiry in the following cases where no conciliation is requested by the Aggrieved Woman. The inquiry shall be conducted by the members of IC in compliance with the quorum as per the provision of the Act and rules specified thereunder.

Kindly note that in case of formal inquiry there will be no confrontation between the parties as well as other concerned people. IC will examine each party separately.

Important: None of the parties can be represented by a lawyer during the proceedings.

Conciliation:

The aggrieved woman may with a written request to the Internal Committee, request for a settlement via conciliation, provided that no monetary settlement shall form a part of the conciliation procedure. In case of the settlement, IC shall record the settlement and forward the same to the Company to take appropriate disciplinary actions per the given recommendations.

The copies of the settlement shall be provided to the Complainant and the Respondent. Upon a conciliation being reached, the IC would not be required to conduct any further inquiry.

Action during the pendency of the inquiry:

During the pendency of an inquiry, on a written request made by the Complainant, the IC may recommend the following actions to be taken:

- transfer the Aggrieved Woman or the Respondent to any other workplace;
- grant leave to the Aggrieved Woman up to a period of three months;
- grant such other relief to the Aggrieved Woman as may be prescribed under the Act and the Rules;
- restraint the Respondent from reporting on the work performance of the Aggrieved Woman or writing his/her confidential report and assign the same to another officer.

5. Disciplinary actions

Considering the severity of the case, the IC may recommend any one or more of the following recommendations:

Written Apology	Verbal / Written Warning	Suspension	Termination	Withholding Increments
Demotion	Fine / Penalty	Transfer	Dismissal	Counselling

Non-Retaliation:

The Company shall not accept, support or tolerate retaliation in any form against the Complainant or the Respondent. Any person who engages in such retaliation directly or indirectly, or encourages others to do so, may be subject to appropriate disciplinary actions.

The Company hereby ensures that:

- Retaliation will be treated as a major misconduct;
- Retaliation against those reporting Sexual Harassment is prohibited by this policy;
- Retaliation means and includes any hurtful employment action(s) against an individual(s);
- Anyone suspecting or experiencing retaliation should report such matter immediately to the HR of the Company;
- Anyone feeling that a retaliation complaint did not get a prompt response can contact email/number directly;
- Retaliation cases are treated as seriously as an alleged case of Sexual Harassment even if the original Sexual Harassment Complaint is not proven.

6. False and malicious complaints

In the case where a false and malicious complaint has been filed and the investigation has proved that the intention of the complaint was purely to defame or take revenge from the Respondent, appropriate disciplinary actions shall be initiated by the Company against the Complainant that may include any recommendations listed in point no. 5 of this policy.

7. Appeal

In the event that the Aggrieved Woman or the Respondent is not satisfied with the recommendations of the IC, the person may appeal to the appropriate authority, as specified by the Act, within a period of 90 (ninety) days of receiving such recommendations from the IC.

8. Confidentiality

The Company assures that the strictest confidentiality will be observed while handling the case of sexual harassment.

Any attempt by the members of the IC or witnesses or any other persons involved in the inquiry to discuss or disclose the information related to the case to anyone including public and media, except those directly involved with the complaint, shall be treated as a major misconduct and shall be liable to disciplinary actions as deemed fit by the Company and penal consequences as per the Act / Rules.

Further, all the IC Members, Head of Departments and all other people involved in any inquiry proceedings are required to sign a Confidentiality & Non-Disclosure Undertaking as may be prescribed by the Company, declaring that

they would maintain utmost confidentiality on all matters discussed under the Act and assure that the information will not be disclosed even to members of senior management who are not directly involved with the complaint.

9. Training and Sensitization

The Company is highly sensitive towards the cause of sexual harassment at workplace and is totally convinced that there is a dire need to conduct gender sensitization workshops for employees at all levels. These workshops will specifically focus on eliminating any gender biases and making people more gender sensitive with an aim to creating a safe and inclusive workplace environment.

Such workshops shall be conducted at regular intervals in a year to keep the stakeholders updated on the issue as well as create constant awareness.

10. Employer to ensure compliance

- The management shall provide all necessary assistance for the purpose of ensuring full, effective, and speedy implementation of this policy.
- In case of any complaint against any of the IC member, the employer (board) shall reconstitute the IC and take necessary steps to ensure effectiveness of the IC constituted for the purpose of conducting inquiry.
- The IC shall prepare a report on all Complaints at the end of the year for submission to Company's management and the Company shall submit the same to the district officer.
- The Company shall ensure effective communication of this policy with the employees at regular intervals.
- The Company shall display the penal consequences of Sexual Harassment and the order constituting the IC at the reception, cafeteria, washrooms and the entire office space.
- The Company shall provide assistance to the Complainant if she chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force.
- The Company shall provide necessary facilities to the IC, to deal with the Complaint and conduct an inquiry.

Annexure A**Details of the Internal Committee Members**

Sr.No.	Name of the IC Member	Designation	Contact Number	Email Address
1	Shruti Desai	Presiding Officer	9821500969	Shruti.desai@sfcenv.com
2	Virendra Rane	Member	9619898816	Virendra.rane@sfcenv.com
3	Rasika Shastri	Member	9167670881	rasika.shastri@sfcenv.com
4	CS Divija Dave	External Member	9167209942	poshshala2021@gmail.com

Annexure B

Format of filing written complaint

Date: _____

To,
Ms. Mr. _____
(Designation of the IC Members)
SFC Environmental Technologies Limited

Name of the Complainant:

Name of the Respondent (Accused):

Department:

Location:

Date, time and place of the incident:

Description of the incident:

List of evidences / witnesses, if any: