



## Solve Plastic Products Limited – POSH (Prevention of Sexual Harassment) Policy



### Introduction

Solve Plastic Products Limited ("the Company") is committed to providing a safe, respectful, and inclusive work environment for all its employees. In accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and Rules, this manual outlines the Company's policy and Standard Operating Procedure (SOP) for the prevention and redressal of sexual harassment. This document is intended for internal use by HR and the Internal Committees, and also serves as evidence of compliance for external audits by regulators (including SEBI and labour officers). It aligns with the Company's existing grievance redressal procedure, while providing a specialized mechanism to handle sexual harassment complaints in a prompt and confidential manner. The Company has **zero tolerance** for any form of sexual harassment and will take immediate disciplinary action against proven misconduct, as detailed in this manual.

### Objective and Scope

**Objective:** The primary objective of this POSH Policy and SOP is to prevent sexual harassment at the workplace, to promote a culture of dignity and respect, and to outline a robust process for addressing complaints. This includes preventive measures, a fair inquiry process, and remedial actions in line with the POSH Act and best corporate governance practices. The policy also ensures compliance with all legal requirements, including constitution of Internal Committees (ICs) and reporting mechanisms.

**Scope:** This policy is applicable to all employees of Solve Plastic Products Ltd. across its head office and all manufacturing units. It covers employees at every level (permanent, temporary, contractual, trainees, apprentices, and volunteers) as well as any women visiting the workplace (such as contractors, vendors, clients, interns, or customers). While the POSH Act specifically protects women employees and visitors, the Company is equally committed to a harassment-free workplace for persons of all genders. Any complaint of sexual harassment will

be taken seriously and addressed under this policy, irrespective of the gender of the complainant or respondent, in keeping with principles of equality and non-discrimination. The policy is applicable not only within the physical office premises and factory sites, but extends to any place or situation connected to work. This includes company-provided transportation, off-site company events, business trips, client meetings, training programs, office outings, or any location where Company business is conducted or where workplace interactions occur (including virtual/online work environments). The term "workplace" under this policy has a broad definition, encompassing any place visited by the employee arising out of or during the course of employment, and includes remote work locations and electronic communications as well.

**Alignment with Grievance Procedure:** The POSH mechanism is integrated with the Company's grievance redressal framework. If a complaint involves sexual harassment, it shall be addressed through the specialized process outlined in this manual (under the Internal Committee), rather than the general grievance handling channel. However, this policy complements the existing grievance procedure – ensuring that all employee complaints are resolved through appropriate routes. HR and management will ensure that any grievance or misconduct report that falls under sexual harassment is redirected to the IC promptly, and that the complainant receives the support and confidentiality protections guaranteed by this policy.

### Definitions

For the purpose of this policy, the following key terms are defined as per the POSH Act and Company policy:


- **Aggrieved Woman (Complainant):** In line with the Act, an aggrieved woman is any woman who alleges to have been subjected to sexual harassment at the workplace. This includes not only Company employees but also non-employees (e.g. contractors, visitors, clients) if the incident occurred in the workplace. (For internal policy purposes, **any employee** – irrespective of gender – who experiences sexual harassment may lodge a complaint, though legal remedies under the Act are specific to women.)
- **Respondent:** A person against whom a complaint of sexual harassment is made under this policy. The respondent is typically an employee of the Company (which includes permanent, contract, trainee, or any person working on behalf of the Company). If the alleged perpetrator is not an employee (e.g. a third-party vendor or customer), the Company will still take steps to protect the aggrieved individual and, if required, coordinate with external authorities, even though the internal inquiry procedures may formally apply only when the respondent is an employee.
- **Employee:** For the purposes of this policy, "employee" covers anyone employed by the Company for any work on a regular, temporary, ad-hoc, or daily wage basis, either directly or through an agent/contractor, including those on deputation, contract workers, probationers, trainees, apprentices, interns, volunteers, or consultants.
- **Employer:** The Company's management, acting through its Board of Directors, Managing Director, or any authorized officers, responsible for overall implementation of this policy and compliance with the Act.





- **Workplace:** Any place where business or work-related activities of the Company are conducted. This includes the Company's head office, all manufacturing units and offices, any off-site locations visited for Company work, client sites, Company-owned/arranged transportation for work commute or trips, hotels or venues used for conferences/training, and even employee housing provided by the Company. It also covers work-related communications or activity through digital platforms (e.g. emails,

office chat systems, video conferences) in so far as they relate to the work environment. Essentially, if an incident has a work nexus, it falls under the "workplace" for this policy's purpose.

- **Sexual Harassment:** "Sexual harassment" includes any unwelcome sexually inclined behaviour, whether direct or implied. As per Section 2(n) of the POSH Act, it encompasses:
  - **Physical contact or advances** that are unwelcome.
  - **A demand or request for sexual favours**, whether explicitly or implicitly.
  - **Making sexually coloured (sexually toned) remarks** or statements.
  - **Showing pornography or obscene images/texts** that are sexual in nature.
  - **Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature.**

The above are illustrative and not exhaustive. Sexual harassment can take various forms – subtle or overt. It may include offensive jokes, comments about someone's body or appearance, lewd or vulgar remarks, innuendos or gestures with sexual connotation, unwelcome touching or brushing against someone, displaying sexually explicit pictures or content, or sending inappropriate emails or messages. It also covers **quid pro quo harassment** (literally "this for that"), where a person in authority seeks sexual favours in exchange for employment benefits (promotion, salary hike, etc.) or threatens adverse consequences for refusal. In addition, **hostile work environment** harassment is covered – e.g. situations where repeated unwelcome sexual or sexist conduct interferes with an employee's work or creates an intimidating/offensive atmosphere. The POSH Act specifies that the following circumstances, among others, if related to any sexual behaviour, may amount to sexual harassment:

-  Implied or explicit **promise of preferential treatment** in employment in exchange for sexual favours (for example, a supervisor suggests a female worker will get a promotion if she goes on a date with him – this is harassment).

-  Implied or explicit **threat of detrimental treatment** in employment for refusal to comply with a sexual request (e.g. threat of poor performance reviews or termination if advances are refused).
-  Implied or explicit **threat about the complainant's present or future employment status** if they do not submit to sexual demands.
-  **Interference with work or creation of an intimidating, hostile, or offensive work environment** – for instance, continuous vulgar comments, wolf-whistling, or sharing obscene material that makes the workplace hostile for the aggrieved person.
-  **Humiliating conduct likely to affect the woman's health or safety**, such as targeting someone with sexual slurs or offensive rumours, causing emotional distress.

*Examples:* A few examples of conduct that would constitute sexual harassment include: unwelcome touching or groping of a co-worker; a manager asking for sexual favours in return for confirming a permanent position; colleagues sharing pornographic videos in an office group chat; repeatedly making sexually suggestive jokes that embarrass a teammate; commenting on an employee's attire or body in a sexual manner; or persistent romantic advances and requests for dates after the person has clearly indicated disinterest. The key element is the **unwelcome** nature of the behaviour and its sexual overtones. Even a single incident, if severe (for example, sexual assault), can constitute harassment, whereas a series of incidents can also create a hostile environment. The perception of the aggrieved individual is important – what might be “harmless” to one can be offensive to another, and the law recognizes sexual harassment as largely subjective to the recipient's experience. All employees are expected to maintain professional conduct; any behaviour that falls under the above definition is strictly prohibited.

### Policy Statement and Responsibilities

**Policy Statement:** Solve Plastic Products Ltd. hereby reiterates that sexual harassment in any form is **strictly prohibited** and will not be tolerated. The Company is dedicated to providing a work environment that is free from harassment, ensuring every employee's right to dignity at work. All employees, regardless of gender, are expected to uphold a standard of conduct that respects colleagues' personal boundaries. Any incident of sexual harassment will be addressed promptly, confidentially, and impartially. The Company will take appropriate disciplinary action against any person found to have engaged in sexual harassment, up to and including termination of employment, in accordance with the law and principles of natural justice.

**Employer's Responsibilities:** The management of Solve Plastic Products Ltd. has a duty under the POSH Act to prevent and deter acts of sexual harassment and to set up the prescribed redressal mechanism. Key responsibilities of the employer include:



- **Establishing the Internal Committees (ICs):** Constitute an Internal Committee at the head office and each unit with the composition and mandate as required by law (detailed in the next section). This includes ensuring each IC is functional at all times, with members appointed and trained.



- **Policy Communication:** Widely disseminating this POSH policy to all employees and displaying notices at conspicuous places in the workplace (e.g. notice boards at offices and factory units) about the penal consequences of sexual harassment and the contact details of IC members. New employees must be informed of the policy at the time of induction.



- **Awareness and Training:** Conduct regular training and awareness programs for employees on what constitutes sexual harassment, how to prevent it, and how to report it. Conduct specialized capacity-building training for IC members to handle complaints and inquiries with sensitivity and in compliance with legal procedures.



- **Support and Assistance:** Provide assistance to the complainant if she chooses to file a police complaint in relation to the incident of sexual harassment. The IC and HR shall assist any aggrieved woman in approaching law enforcement, if requested. Also, ensure that the complainant or witnesses are not victimized or discriminated against while the complaint is pending or thereafter.



- **Resources:** Provide the Internal Committees with the necessary resources and administrative support to conduct inquiries (e.g. private meeting space, documentation facilities, travel expenses for external member). The Act entitles the External Member to an allowance/fees and reimbursement of travel costs for participating in IC proceedings, which the Company will duly pay.



- **Disciplinary Action:** Implement the recommendations of the IC in a timely manner (within 60 days). If an IC finds a respondent guilty of sexual harassment, the Company will act on it by imposing appropriate penalties or corrective measures as suggested, consistent with Company's service rules and applicable law.



- **Confidentiality and Safe Environment:** Maintain confidentiality of the complaint process as required by law (no sensitive information to be leaked to other staff or media). Also, take immediate steps to stop any harassment and prevent its recurrence. For instance, if a complaint is received, and if necessary, the Company may change the reporting structure or workplace arrangements to separate the complainant and the accused during the inquiry. Interim reliefs recommended by the IC (like leave or transfer) must be executed by management to safeguard the aggrieved person during the pendency of inquiry.



- **Reporting:** Monitor compliance and submit annual reports as required (details in a later section). The Company's Board of Directors shall also include a disclosure in the Directors' Report affirming that the Company has complied with POSH Act provisions, including constitution of the ICs.

**Employee's Responsibilities:** Every employee of the Company has a responsibility to contribute to a safe work environment. This includes:

- **Professional Conduct:** Treat all colleagues with respect and refrain from any behaviour that could be construed as sexual harassment. Be mindful of one's language, gestures, and actions, keeping interactions professional.
- **Awareness:** Familiarize oneself with the POSH policy and attend the awareness programs provided. Understand what constitutes unacceptable behaviour and the impact it can have on others.
- **Speaking Up:** If an employee experiences or witnesses sexual harassment, they should not hesitate to report it. Employees are encouraged to come forward with complaints (as complainant or witness) without fear, as the Company guarantees protection from retaliation. Bystanders who witness harassment should, wherever possible, inform an IC member or supervisor so that help can be provided to the victim.
- **Cooperation:** Employees who are involved in an inquiry – whether as parties or witnesses – are expected to cooperate fully and truthfully with the IC. Providing any information requested by the IC and maintaining confidentiality about the proceedings are crucial.
- **No Retaliation:** No employee should retaliate against or victimise any person for filing a complaint or testifying in an inquiry. Such retaliatory behaviour will be treated as a serious misconduct.

**Internal Committee's Responsibilities:** The Internal Committee at each location is the cornerstone of the redressal mechanism. The IC acts as an inquiry authority into complaints of sexual harassment. Its key duties are:



- Receiving and acknowledging complaints of sexual harassment in a sensitive and timely manner.
- Explaining to the complainant the options available (informal resolution through conciliation if requested, or formal inquiry) and the procedural steps, including timelines and rights.
- Conducting a prompt, thorough, and fair inquiry into each complaint, adhering to the principles of natural justice (no bias, both sides heard). The IC must ensure confidentiality and neutrality during the process.
- Recommending interim relief measures to the employer during the inquiry if required (such as transferring one of the parties, or granting leave to the aggrieved woman).
- Upon completion of inquiry, preparing a detailed **Inquiry Report** with findings and recommendations for action. The report should clearly indicate whether harassment was substantiated, and suggest suitable disciplinary actions or other remedies as per law and company policy.
- Submitting the inquiry report to the employer (and to the District Officer if required) and sending copies to both parties within the stipulated time (10 days from completion of inquiry).
- Recommending to the employer steps for preventing further harassment, which could include training or changes in policy if systemic issues are observed.
- Maintaining all records of complaints and inquiry proceedings in strict confidence, and issuing the **annual report** on POSH compliance to the management and District Officer as required by the Act.
- Upholding the integrity of the process – IC members must recuse themselves from a case if they have any conflict of interest or bias regarding either party. They must also refrain from any act that could compromise the inquiry or violate the law (for instance, **IC members must not disclose case details to anyone who is not legitimately involved**; such breach can lead to their removal).

By delineating these roles and responsibilities, the Company ensures that everyone – from management and IC members to ordinary employees – plays their part in preventing harassment and fostering a safe workplace.

### Constitution of Internal Committees (ICs)

*Structure of the Internal Committee (IC) as per the POSH Act.* Each Internal Committee consists of a senior woman employee as the Presiding Officer, at least two other employee members (ideally committed to women's cause or having legal/social knowledge), and one external member from an NGO or similar association, with a minimum of half the members being women. Solve Plastic Products Ltd. will constitute an IC at the head office and at each of its four manufacturing units in line with these requirements, ensuring that complaints can be addressed locally at every workplace. This section details the **procedure and structure** for

constituting the Internal Committees, including member qualifications, appointment process, and tenure.

### Requirement for Multiple Committees

As a Company operating multiple facilities, we recognize our legal obligation to establish an Internal Committee at each office or branch employing 10 or more employees. Each manufacturing unit and the head office are considered separate “workplaces” for the purposes of this law, and hence each will have its own Internal Committee. All ICs will function in accordance with the POSH Act, and a standardized approach will be adopted across the Company to ensure consistency. A senior HR representative or other designated official at corporate level will coordinate among the various ICs to share best practices and ensure uniform compliance, but **each IC is autonomous in handling cases at its location**. In case an IC cannot be constituted at a particular location due to insufficient staff (e.g., if a unit had less than 10 employees or lacks an eligible senior woman for Presiding Officer), the Company will make alternative arrangements as per law – such as having the complaint addressed by the IC of another location or by the government’s Local Committee. (However, currently all our units meet the criteria for having their own IC.)

### Composition of the Internal Committee

Each Internal Committee will be constituted by a formal order in writing issued by the Company’s competent authority (e.g., a Board Resolution or Office Order by the Managing Director). The composition of the IC will be as follows:

- **Presiding Officer (Chairperson):** A senior woman employee of the workplace shall be the Presiding Officer of the IC. She should be in a managerial or supervisory role and be respected and trusted by employees. The Presiding Officer leads the committee and is responsible for convening meetings and inquiries. *If no senior female employee is available at a unit*, the law permits the Presiding Officer to be appointed from another office/unit of the Company. For example, if Unit A does not have a senior-grade female employee, a suitable senior woman from the Head Office or another unit can be appointed as Presiding Officer for Unit A’s IC. This ensures that the requirement of a female chairperson is met.
- **Internal Members (Employee Representatives):** In addition to the Presiding Officer, *at least two* members will be drawn from among the employees at that workplace. These members are nominated based on their likely commitment to the cause of women or their experience and aptitude for handling such issues. Ideally, members could be individuals with HR or legal background, or employees who have demonstrated empathy, integrity, and fairness in their roles. If possible, the Company will include members who have prior experience in social work or have received training on gender sensitivity. Diversity in the IC is encouraged – for instance, members from different departments or levels can provide broad perspectives. At all times, at least 50% of the total IC members must be women, as mandated by the Act, to ensure a gender-sensitive approach.



- **External Member:** One member of each IC must be from outside the organization. This External Member is appointed to bring an independent perspective and to ensure fairness. The law requires that this person be familiar with issues relating to sexual harassment – for example, they may be from a non-governmental organization (NGO) or an association committed to women's rights, or an individual experienced in social work on gender issues, or a person familiar with labour or criminal law. The External Member should ideally have at least **5 years of experience** in social work or in advocacy on women's issues. This could include counsellors, legal professionals, or activists in the field of women's empowerment. The presence of an external expert helps in maintaining neutrality and credibility of the process, especially in cases involving senior management.
- Every IC will thus have a minimum of 4 members (Presiding Officer + 2 internal members + 1 external member). The Company may choose to nominate more than the minimum number of employee members in an IC, provided the composition balance (especially the women members ratio) is maintained. A quorum of **at least 3 members (including the Presiding Officer and at least one external member whenever possible)** should be maintained for any inquiry proceedings.

**Qualifications and Qualities of IC Members:** In addition to the formal criteria above, the following qualities are considered when appointing IC members: integrity, objectivity, sensitivity, and approachability. Members should not have any proven misconduct records. They should be trusted by colleagues to handle issues confidentially. The Company may invite volunteers or recommend individuals for IC roles and then formally nominate them. All IC members must undergo orientation on the POSH law and investigation techniques so they are well-equipped to fulfil their role.

### Appointment Process

**Order of Constitution:** The IC at each location will be constituted through a written order from the management of the Company.

**Tenure of IC Members:** As per Section 4(3) of the POSH Act, no member can hold office for more than **three years** from the date of appointment. Therefore, the tenure of each IC (including all its members) will be **3 years**. The Company will formally reconstitute each IC at intervals not exceeding three years. Members may be eligible for re-nomination, but as a best practice, we will rotate membership to bring in fresh perspectives and also to give others a chance to contribute (except in cases where suitable replacements are not available, in which case an existing member's term could be extended slightly with proper justification, ensuring compliance with law). The term of the current IC members will be indicated in their appointment letter. A centralized record of when each IC was last formed will be maintained by HR to trigger reconstitution before the 3-year term lapses.

**Removal and Disqualification:** An IC member (including the Presiding Officer or external member) may be removed **before the completion of their term** if they cease to meet the criteria or breach certain conditions. The POSH Act provides specific grounds under which the Presiding Officer or any member **must be disqualified and removed** from the IC. These include:

- If the member **contravenes the provisions of the POSH Act** or its rules.
- If the member has been **convicted of an offense** or there is an ongoing criminal inquiry against them.
- If the member has been found guilty in any **disciplinary proceedings** in the Company, or if a disciplinary proceeding is pending against them
- If the member has **abused their position** as an IC member, or engaged in any conduct that makes their continuance in the committee **prejudicial to public interest or the interest of the Company**.
- In the event any of the above situations arise, the member will be removed from the IC immediately, and the vacancy will be filled by a fresh nomination of another person who meets the required

### Training and Capacity Building of IC

The Company will organize training for IC members at regular intervals (at least annually). This training will cover the POSH Act and Rules, skills for conducting inquiries (interview techniques, evidence evaluation), documentation, and sensitivity in dealing with traumatized individuals. Members will also be updated on any case law or amendments in this area. New IC members (especially external members) will receive an orientation on the Company's business, work culture, and this POSH policy. Periodic meetings of all ICs (across units) may be convened by Corporate HR so that members can discuss challenges and share best practices (these can be without discussing specifics of any case, to maintain confidentiality).

### IC Operations and Meetings

While the IC will primarily meet when a complaint is received (to conduct inquiries), it is recommended that ICs hold **at least one meeting each quarter** even if there are no pending cases. In such meetings, they can review the implementation of this policy, plan awareness activities, and discuss any procedural improvements. Minutes of these meetings should be recorded by the Presiding Officer or a member. These minutes can be reviewed by senior management for compliance checks (excluding any case-specific confidential details). Each IC should also coordinate with the Company's HR/Compliance team to prepare the annual summary report of cases (even if nil cases, a report stating such) for submission to the District Officer and inclusion in the Company's annual disclosures.

With the committees duly constituted as above, the following section explains the step-by-step **Standard Operating Procedure (SOP)** that each IC (and the Company) will follow upon receiving a sexual harassment complaint.

## POSH Complaint Handling Procedure (SOP)

This section outlines the detailed process to be followed by the Internal Committees for **receiving, inquiring into, and disposing of complaints** of sexual harassment. The procedure is designed in accordance with the POSH Act, ensuring fairness, confidentiality, and timeliness. All IC members and parties involved should adhere strictly to these steps.

### 1. Filing a Complaint

**Who Can Complain:** Any aggrieved woman employee, or in general any employee who believes they have been subjected to sexual harassment at the workplace, may file a complaint under this policy. The complaint should preferably be made by the victim herself. In certain cases, if the aggrieved woman is unable to make a complaint (due to physical or mental incapacity, or death, or other compelling reason), the Act allows her **legal heir, guardian, or authorized relative/friend** to file a complaint on her behalf, with her consent. The IC should render reasonable assistance to an aggrieved person in writing down and submitting the complaint if needed (for example, if a woman is traumatized and unable to articulate the complaint clearly, an IC member can help her record it in writing).

**Form and Timeline:** The complaint **must be in writing**. It can be a letter or email or a filled-out complaint form (see Annexure I for the suggested format). The complaint should contain the details of the incidents (dates, places, descriptions of unwelcome behaviour, names of witnesses if any, etc.) and the name of the respondent (the alleged harasser). Under the law, the complaint should be submitted **within three months** from the date of the last incident of alleged harassment. If there are multiple incidents, the three-month period runs from the most recent incident. However, this limitation is not absolute – the IC *may extend the time limit by another three months* if it is satisfied that there were genuine reasons preventing the complainant from filing within the initial three months. For instance, if the woman was medically incapacitated, or faced threats, or was emotionally distraught, these can be cited as reasons for delay and the IC can still accept the complaint up to 6 months from the incident. The request for extension and IC's decision should be documented in such cases.

**Where/How to Submit:** The complainant can submit her written complaint to **any member of the Internal Committee** or directly to the Presiding Officer of her location's IC. It can also be given to a designated HR official who will forward it to the IC immediately. The policy allows complaints via email as well – the Company may designate a specific email address (cs@balcopipes.com) that automatically notifies the IC members. Upon receipt of the complaint, the IC member or HR must acknowledge it and forward it to the Presiding Officer of the respective IC within **3 working days** (if someone other than the Presiding Officer received it initially).

**Complaints against Senior Management:** If the complaint is against a particularly senior person (e.g., a top executive or a director), the same process applies, but the IC and Company should ensure absolute independence of inquiry. The MD/Board will be kept informed of such a case.

only to the extent needed to enable inquiry (such as securing evidence or preventing interference). In case the complaint is against the Presiding Officer of an IC or any member of an IC, that person will be excluded from the handling of that complaint (the Company may temporarily appoint another member for that case or route the complaint to another location's IC or the government's Local Committee).

**Contents of Complaint:** It is in the complainant's interest to provide as much detail and supporting material as possible. As per law, the complainant should ideally submit **six copies** of the written complaint along with supporting documents and names/addresses of witnesses. (The reason for six copies is that one is kept for records, one for the respondent, and copies for each IC member). If the complaint is received via email or single copy, the IC will arrange to duplicate the copies as needed internally. The complainant should sign the complaint (if a physical copy). Annexure I provides a template that covers all necessary information for a complaint.

**Initial Review:** On receiving the complaint, the Presiding Officer should do a preliminary check to ensure it falls under the ambit of sexual harassment and this policy. If any essential information is missing (e.g., dates or names), the IC can reach out to the complainant for clarification. However, the IC should **not reject any complaint outright** due to formality issues – all complaints of alleged sexual harassment must be formally registered and processed. The IC will assign a unique reference number or code to the case for tracking (especially if multiple cases in the year).

## 2. Conciliation (Optional)

Before commencing a formal inquiry, the POSH Act offers an opportunity for conciliation, *provided the complainant requests for it in writing*. **Conciliation is a voluntary, informal resolution mechanism** where the IC can help the parties reach a mutual settlement, **without going through a formal inquiry**. Important points regarding conciliation:

- Conciliation can be initiated **only if the aggrieved woman specifically asks for it**. The IC cannot impose conciliation, and the complainant is absolutely free to choose inquiry instead. There shall be no pressure on her to settle.
- The objective of conciliation is to restore a harmonious working relationship if possible. **No monetary settlement is allowed as a basis of conciliation**. This means the complainant cannot be paid off to withdraw the complaint. However, an apology from the respondent, a commitment to cease the offensive behaviour, or other agreed terms (like a transfer or project change) could be outcomes of conciliation if the complainant finds these satisfactory.
- If the complainant requests conciliation, the IC will notify the respondent and arrange a meeting or mediation between the parties. The IC may act as mediator or appoint a suitable mediator (often the External Member plays a role in this). The process should be quick and confidential. **Both parties must enter conciliation voluntarily** – if the

respondent refuses to participate or no acceptable solution is found, the IC will proceed with formal inquiry.

- If a **settlement is reached**, the IC will record the terms of the settlement in writing, have both parties sign it, and forward the **conciliation report** to the employer for implementation. Copies of the settlement will be given to the complainant and respondent. The IC will ensure that the agreed terms (for example, a written apology letter, or a promise of behaviour change) are complied with by the concerned parties. Once a settlement is arrived at, **no further inquiry is conducted by the IC** – the case is treated as resolved.
- The IC should monitor that the settlement terms are honoured. If the **respondent breaches any term of settlement**, or the complainant informs the IC that the harassment has resumed, then the complainant has the right to re-initiate the complaint. The IC, upon receiving such information, **must proceed with a formal inquiry** of the original complaint (as if conciliation had not taken place). Essentially, a failed conciliation or violation of settlement will lead to the full investigation process.

Conciliation is generally suitable for less severe issues or misunderstandings. For egregious misconduct or where the complainant seeks a formal determination, conciliation is usually not invoked. The IC will never pressure any party to settle and will keep a record that the option was offered and either accepted or declined by the complainant.

### 3. Inquiry Process

If conciliation is not requested, or fails, or is deemed inappropriate, the IC will conduct a **formal inquiry (investigation)** into the complaint. The inquiry process must adhere to the principles of natural justice – allowing both parties a fair chance to be heard and to present evidence. The key steps in the inquiry are:

**a. Notice to the Respondent:** The IC shall send a written notice to the person accused (Respondent) along with a copy of the complaint and any supporting documents, within **7 working days** of receiving the complaint. The notice will inform the respondent about the allegations and invite them to submit a written reply along with any evidence and a list of witnesses. The respondent is given up to **10 working days from receipt of the complaint copy** to file their reply and documents. This timeline is as per the rules and ensures a prompt start to proceedings. The respondent's reply (which may either admit, deny, or explain the allegations) once received, should be shared with the complainant as well for her information.

**b. Constitution of Inquiry Panel:** The full Internal Committee will typically be involved in the inquiry. The Presiding Officer will schedule the first meeting/hearing. A minimum quorum of 3 members of the IC should be present for all hearings, and it is mandatory that the **Presiding Officer (Chairperson) is present** in all proceedings. If the External Member cannot attend a particular meeting, the IC can proceed as long as the quorum is met, but involvement of the external member is highly encouraged especially during evidence evaluation and final decision.

**c. Conduct of Hearings:** The IC will conduct private hearings where first the Complainant is heard and then the Respondent. **Principle of hearing both sides (“audi alteram partem”) is strictly followed.** The IC may begin by allowing the complainant to recount her experience in detail. The IC members can ask clarifying questions. The respondent will then be given an opportunity to state his perspective or defence. Both parties are allowed to submit any documents, messages, emails, or other evidence, and to bring forth witnesses who can support their case or were privy to the incidents.

**Note:** To protect privacy and avoid intimidation, **parties are not allowed to directly confront or question each other** during the IC proceedings. There is **no provision for lawyers or outside advocates** to represent either side during the IC hearings (the process is internal and non-judicial). The POSH Rules discourage allowing any legal practitioner to appear on behalf of either party in the IC, to keep the inquiry less formal and free of legal technicalities. However, the parties can be accompanied by a co-worker or friend for emotional support if the IC permits, but that person cannot speak on their behalf. All questioning of one party to the other is done through the IC. For instance, if the respondent wishes to challenge something the complainant said, he can request the IC to ask certain questions, or he can submit questions in writing to the IC, which the IC may pose to the complainant or witnesses as appropriate. This maintains a decorum and prevents aggressive cross-examination. The IC effectively acts with powers similar to a civil court in this context – it can **summon and enforce attendance of any person, require discovery and production of documents, and take evidence on oath** if necessary. Statements of parties and witnesses are recorded in writing and signed by them during the proceedings.

**d. Evidence and Witnesses:** The inquiry should be fact-finding. The burden of proof is not on the complainant in a strict sense, as the IC is expected to actively seek truth. Both the complainant and respondent can provide a list of witnesses. The IC will call each witness for testimony privately. Witnesses may include co-workers, supervisors, or anyone who might have seen the behaviour or to whom the complainant confided. The IC should ask relevant questions to ascertain facts. Witness statements are documented. The respondent is allowed to suggest questions to be put to the complainant or witnesses, and vice versa, as part of a due process (again, via the IC to avoid direct confrontation). If any material evidence (documents, emails, CCTV footage, etc.) is available, the IC should gather and examine it. The IC can seek help from management for things like retrieving camera footage, email logs (maintaining confidentiality of the request).

All proceedings should be properly recorded. **Confidentiality agreements** can be taken from parties and witnesses to not discuss the matter outside. If at any point the complainant wants to provide additional evidence or new witnesses, the IC should allow it (if within reason), as the goal is to be thorough.

**e. Interim Measures:** During the inquiry (or even at the complaint receipt stage), the IC may recommend certain interim measures to the employer to safeguard the complainant from further trauma or retaliation. These measures, under the Act, can include:



- **Transfer of either party:** For instance, the respondent may be transferred to another department or location during the inquiry, or if the complainant prefers, she may be moved to a different team, to avoid daily interaction.
- **Leave for the Aggrieved Woman:** The complainant can be granted paid leave up to **3 months** (in addition to her regular leave entitlements) to recover from trauma or escape a hostile environment during the inquiry. This leave will not be deducted from her accrued leaves.
- **Suspension of respondent or change in reporting:** In some cases, the IC can recommend that the respondent be temporarily placed on leave or relieved of certain supervisory duties. For example, if the respondent is the complainant's supervisor, the IC may advise that the respondent is not to have any supervisory authority over the complainant or her appraisals during the inquiry (this might involve shifting reporting lines or having someone else review the complainant's work).
- **No-contact directive:** The IC can explicitly instruct the respondent (through the employer) not to make any contact (personal or electronic) with the complainant during the pendency of inquiry, except through IC proceedings.

The employer is bound to implement these interim recommendations and report back to the IC on the action taken. These are preventive steps and do not in any way prejudice the outcome; they are merely to ensure the complainant feels safe and the inquiry can proceed without hindrance or pressure.

**f. Time Frame for Inquiry:** The IC will strive to complete the inquiry within **90 days** from the date of receipt of the complaint. This is the maximum time allowed by law for the inquiry phase. In practice, the timeline may be shorter depending on complexity (some inquiries can be concluded in a few weeks if evidence is straightforward; others might need the full period if there are many witnesses or incidents). The IC should meet regularly (e.g., weekly hearings) to ensure momentum. If any extension beyond 90 days is absolutely needed due to exceptional reasons (e.g., key witness on long medical leave), it should be recorded and ideally the District Officer or appropriate authority informed, but the goal is to avoid any such delay.

**g. Non-Appearence of Parties:** If the complainant **does not attend** the inquiry hearings (without prior intimation or valid reason) despite repeated notices, the IC has the right to terminate the inquiry proceedings **ex parte** (without her input). However, this can only be done if the complainant has been given at least a 15 days' advance warning in writing about possible ex parte decision and she still fails to appear for *three consecutive hearings*. Similarly, if the **respondent fails to appear** for three scheduled hearings without sufficient cause, the IC can proceed ex parte and even conclude that the respondent has no defense if evidence suggests harassment. In either scenario, a written notice must have been sent to the defaulting party giving them a final chance. The IC must document all such notices and absences. (Even if proceeding ex parte, the IC should carefully evaluate whatever evidence is available rather than automatically deciding against the absent party; fairness should prevail even in their absence.)

**h. Principles of Natural Justice:** Throughout the inquiry, the IC must ensure there is no bias. Any IC member who has a conflict (e.g., close friend of either party or reporting to one of them) should not sit on that case. Both parties should be given equal opportunity to present their side and rebut the other's claims. The decision should be based on evidence and testimony, not on assumptions or stereotypes. The IC should keep an open mind until all material is reviewed. They should avoid any behaviour that could be seen as prejudiced (like blaming the victim or trivializing the issue).

#### 4. Inquiry Report and Recommendations

After completing the inquiry (i.e., after hearing the complainant, respondent, and all witnesses; and considering all evidence submitted), the Internal Committee will prepare a written **Inquiry Report**. This is a crucial document that will detail the proceedings and the findings of the committee. The report should be issued **within 10 days of the completion of the inquiry hearings**. The contents of the report typically include:

- **Reference of the Complaint:** Date of complaint and summary of allegations.
- **Composition of IC:** Who conducted the inquiry (names of members present in hearings).
- **Documents and Witnesses:** List of documents examined and witnesses interviewed.
- **Proceedings:** Brief description of how the inquiry was conducted (number of meetings, dates, any procedural points like conciliation attempted or not).
- **Analysis:** The IC's assessment of the evidence. This would cover each important point raised in the complaint and whether it was substantiated or not. Contradictions or corroborations from witnesses should be noted. The IC will determine, based on a preponderance of probability, whether the alleged acts occurred.
- **Findings:** The IC will explicitly state whether, in its finding, the allegation of sexual harassment is **proved, not proved**, or if the complaint was **malicious/false** (this last determination requires evidence of malicious intent). Essentially:
  - If the IC believes the respondent did engage in the behaviour and it qualifies as sexual harassment under the policy, then **harassment is substantiated** (proved).
  - If the IC believes the act did not occur, or does not amount to harassment as per evidence, then it is **not substantiated**.
  - If the IC finds that the complaint was made with malicious intent or the complainant or any witness gave false evidence knowingly, it will record that finding (rare cases) – see note on false complaints below.
- **Recommendations:** Based on the findings, the IC will recommend action. If harassment is proven, the IC will recommend to the employer one or more of the following **disciplinary actions** against the respondent, appropriate to the severity of the conduct:

- A written apology to the aggrieved woman (especially in minor first-time offenses where the complainant is satisfied by an apology).
- Written warning or reprimand in the respondent's file (this affects performance appraisals and puts them on notice).
- Transfer or reassignment of the respondent to a different location or department (particularly if continued working in the same team is not advisable).
- **Withholding of promotion or pay raise/increments** for a period of time.
- Demotion, if applicable.
- **Suspension without pay** for a certain duration.
- **Termination of employment (dismissal)** – recommended in cases of grave misconduct or repeat offenses.
- Undergoing counselling or professional training (such as gender-sensitivity training).
- Community service or similar constructive remedy (if it fits the situation).

The IC may list one or multiple actions. For example, in a moderate case, an IC might recommend a combination: e.g., a written apology + one month suspension + sensitization training. In a very serious case (like sexual assault), direct termination may be advised.

Additionally, the IC can recommend that the employer **deduct from the respondent's salary** a certain sum as compensation to be paid to the aggrieved woman. This is allowed under the Act in cases where the complainant suffered financially or psychologically. The IC will consider factors like the trauma caused, medical expenses (if any), impact on career, and the offender's income while suggesting an amount. If the respondent has left the company or is unwilling to pay, that amount can be recovered as an arrear of land revenue as per law, through the District Officer, but the IC only recommends – the actual enforcement may involve legal processes.

If the IC finds **no proof of harassment**, it will recommend no action against the respondent (the complaint is dismissed as “not proved”). If the IC finds the complaint was intentionally false or malicious, then it may recommend disciplinary action against the complainant (or the witness who gave false testimony) **equivalent to those for harassment**. However, **simply not being able**

**to substantiate a complaint is not the same as it being malicious** – malicious intent must be clearly evidenced for any action against a complainant. The Act is careful to mention that a mere inability to prove the case or provide adequate proof does not attract punishment for the complainant. Only if a false allegation was made with malice, or a witness gave deliberately false testimony, can the IC consider such a recommendation, and even then, the severity should be proportionate (perhaps a warning or minor penalty unless it was an egregious, proven false accusation).

- **Other Measures:** The IC might also suggest to the employer other measures, like: counselling for the complainant (if she needs support to recover from the experience), or further training in that department, or changes in workplace policy to prevent future incidents. These suggestions, while not punitive, are aimed at better prevention.

**Distribution of Report:** Once finalized, the Inquiry Report (with the findings and recommendations) will be signed by the Presiding Officer and members of the IC. The IC will forward the report to: (a) the **Employer (Management)** – typically to the HR Head or Managing Director who is authorized to take action; and (b) to both the **Complainant and the Respondent**. This should be done within 10 days of concluding the inquiry. Both parties should get a copy so they are fully aware of the outcome and the reasoning. The contents of the report are **confidential** and the parties are advised not to disclose them to anyone else, except if required for legal action.

**Post-report Communication:** The IC or HR may also personally meet the complainant to explain the outcome and reassure her of next steps (especially if harassment was proved, to ensure she feels safe with the measures taken). Similarly, the respondent can be briefed about what the decision means for them (e.g., if termination, HR will handle the offboarding as per rules).

## 5. Action by Employer on IC Recommendations

The ball is now in the employer's court to implement the IC's recommendations. The management is legally obliged to act **within 60 days** of receiving the IC's report.

- If the IC found the complaint to be valid and recommended disciplinary action, the Company will promptly initiate those actions. For minor penalties like apology or warnings, HR will arrange the drafting of apology letters or issuance of warning letters. For major penalties like termination or pay deduction, the Company will follow its HR process (e.g., approval from the Managing Director, final settlement in case of termination, etc.) but will not deviate from the essence of IC's recommendation. The Company cannot dilute the punishment recommended by the IC; if for some unforeseen reason the management considers not implementing a suggestion, it must have very strong justification (and likely should discuss with the IC or seek legal counsel, given non-compliance could attract penalties). Usually, the Company will comply fully.
- The outcome and action taken should be communicated to the IC and the complainant. For example, if the IC suggested a salary deduction of one month's wage to give as compensation, the Company will calculate that, deduct it in payroll, and transfer the amount to the complainant. A confirmation of the payment or action taken can be given to the IC so they can close the case in their records.
- If the IC recommended action against a complainant for a false complaint, the employer should similarly carry that out (though, again, with caution and only if evidence clearly supported malice, to avoid discouraging genuine complainants in future).
- In case of proven harassment, the HR department should also consider if the incident needs to be mentioned in the service record of the harasser or if any reference check

requests in future would reveal that the person was terminated for misconduct (the Company's reference policy can state "left due to disciplinary reasons" etc., without divulging details, unless legally required).

- If the respondent is exonerated (complaint not proved), both parties continue in their roles. The Company will ensure that no retaliation or ill-treatment happens to the complainant for filing the complaint. Even if not proved, the complainant had the right to raise it and must not be victimized. HR may counsel both parties (and possibly relocate one or both if staying in the same team is not workable due to the strain). The IC can suggest any measures to ensure no hostility remains (like team counseling, etc., while keeping details confidential).

**Appeal:** After the employer communicates the action taken, the case is officially closed at the internal level. However, **either party (complainant or respondent) who is not satisfied with the outcome has the right to appeal.** The law provides that an appeal can be made to the court or tribunal designated (often an appellate authority under the service rules or the local labour court) within **90 days** from the date of receipt of the IC's recommendations or implementation of those. The Company will include in its closure letter a mention that "if not satisfied, you may appeal to the appropriate authority as per Section 18 of POSH Act within 90 days." If an appeal is filed, the Company will participate in those proceedings as required (providing documents to the court, etc.). The IC's role is generally concluded, unless asked by an appellate body to reinvestigate or clarify something.

## 6. Confidentiality and non-retaliation

Confidentiality is the backbone of the POSH process. As per the POSH Act, **the identity of the complainant, respondent, and witnesses, and the details of the complaint or inquiry proceedings must not be disclosed to the public or media.** This is to encourage victims to come forward without fear of stigma and to protect reputations of all parties during the process. In compliance with this:

- All IC members, parties, and any other personnel involved are **duly-bound to maintain secrecy** about the case details. They will be required to sign a confidentiality acknowledgement at the start of any proceedings.
- Except for making necessary disclosures to carry out the inquiry or to implement the recommendations, no information about the complaint will be shared. For instance, a witness may be informed of the allegations to get their statement, but they too are cautioned to keep it confidential.
- The Act prescribes a penalty (fine up to Rs. 5,000) for any person who breaches confidentiality improperly. The Company may take disciplinary action against any employee (including IC members) who violate this confidentiality clause.
- Even in the Annual Report or any public reporting, **no names or identifying information** of the aggrieved woman or respondents will be revealed. Data is shared in aggregate, e.g., "number of cases filed/disposed," without personal details.

- Documents pertaining to an inquiry are kept secure (for example, in a password-protected file or a locked cabinet in HR). Access is limited to IC members and authorized management. If any information needs to be shared with regulatory authorities or court, it will be done under proper record and only to the extent required by law.
- All participants are instructed that gossiping about the matter, or retaliatory talk, is strictly prohibited.

Non-retaliation: The Company assures that no one who, in good faith, lodges a complaint or participates in an inquiry will face retaliation in their job or work environment. Retaliation can include unfair performance evaluations, denial of promotions, spreading rumours, harassment, or ostracization of the complainant or witnesses. Such acts, if noticed, can be reported to HR or directly to the Managing Director. They will be treated as serious misconduct and punished accordingly. The immediate supervisors of both parties should also be sensitized (without giving them details if they're not aware of the case) that they must not allow any team dynamics that punish one side. The period after a complaint can be sensitive; HR will check in discreetly with the complainant post-case to ensure she is not facing any backlash. The IC can also decide to keep a watch. Our Company policy is clear: **any retaliation or victimization will result in disciplinary action**, which could be as severe as termination of the retaliator's employment.

## 7. Malicious or False Complaints

While the policy's intent is to protect genuine victims, it also has provisions to deal with any misuse. If a complaint is found by the IC to be **maliciously false** – meaning the complainant knowingly fabricated allegations or forged evidence – the IC may recommend action against the complainant. The same applies to any witness who is found to have given false testimony deliberately. However, **false complaint action will never be taken simply because the case was unproved**. There must be evidence of intent to deceive (e.g., the complainant admitted to lying, or it's proven that the allegations were entirely baseless and made with malice). The IC, when declaring a complaint malicious, will record reasons. Disciplinary action in such cases could mirror those for harassment: a warning, or more severe punishment depending on the impact of the false complaint (e.g., if someone tried to frame another with a false claim, that is grave misconduct). This clause is there to deter misuse, but the Company recognizes that false complaints are exceedingly rare compared to genuine ones and will not use this provision to discourage legitimate grievances.

With the detailed SOP covered, the next section outlines how the Company handles compliance documentation, reporting, and audits to ensure that not only are individual cases managed, but the overall system is effective and meets all legal requirements.

## Documentation, Reporting, and Compliance Audits

The Company places equal importance on **post-investigation compliance** – that is, proper record-keeping, statutory reporting, and readiness for audits by authorities (such as labour department inspections or corporate governance audits by SEBI or other bodies). This section



details the practices for disposal of cases (record management), annual reports, and coordination with regulatory agencies.

### Documentation and Record-Keeping

Every sexual harassment complaint and the subsequent proceedings generate confidential records. The following documents will be maintained by the IC/HR for each case:

- The original **written complaint** along with any attachments (emails, photos, etc. provided).
- The formal **acknowledgment** of receiving the complaint (if issued).
- **Notices** sent to the respondent and witnesses (with dates).
- **Written reply** from the respondent, if any, and any evidence submitted by respondent.
- **Minutes of IC meetings/hearings** – a summary of each meeting, who was present, statements made (or verbatim transcripts if taken), and any interim orders. If the IC obtained signed statements from witnesses or parties, those are kept on file.
- **Copies of any interim relief recommendations** and the employer's action taken report on those (for instance, letter granting leave to complainant, or transfer order of respondent).
- The final **Inquiry Report** (signed by IC members).
- Proof of **delivery of the report** to the parties (like email read receipts or acknowledgment signatures).
- The **employer's decision/action letter** based on the report (e.g., termination letter, or closure intimation if not proved).
- If applicable, any **appeal documentation** (though the appeal would be external, if the Company is informed of an appeal or receives a notice from a court/tribunal, that will be recorded too).

These records will be maintained by the Head of HR or a designated Custodian (often the Presiding Officer or the POSH compliance officer if one is designated). All records will be kept **securely** and confidentially. By law, there's no explicit retention period specified for POSH case documents, but as a best practice, the Company will retain all case files for at least **3 years** from the date of conclusion of the proceedings. In case of any ongoing litigation or investigation, records will be kept until that is resolved even if beyond 3 years. The records may be kept in physical files (locked cabinet) or scanned and stored in an access-restricted folder.

These documents are *not* to be shared internally except on a need-to-know basis (e.g., if a new IC member takes over mid-case, they get access; or if HR needs to enforce actions). They are certainly not accessible to general employees to "check what happened" – no, confidentiality is paramount.

### POSH Annual Report (Internal Committee Annual Report)

Each Internal Committee is required by Section 21 of the POSH Act to prepare an **Annual Report** at the end of each calendar year and submit it to the employer and the District Officer (a local government authority appointed under the Act). The Head Office IC can also compile a Company-wide report, but each IC should cover its own jurisdiction. The Annual Report will contain the following information as specified in Rule 14 of the POSH Rules:

1. **Number of sexual harassment complaints received in the year.** (If none were received, it should explicitly state zero. This shows whether employees are coming forward and is a compliance indicator.)
2. **Number of complaints disposed of during the year.** (Disposed means a final decision was made by the IC and action taken by employer. Some could be from previous year and concluded this year, that counts too.)
3. **Number of cases pending for more than 90 days.** (Ideally zero – this entry tracks delays. If any inquiry took longer than 90 days, the number of such cases is reported, with possible reasons to be given to authorities if asked.)
4. **Number of workshops or awareness programs carried out on sexual harassment.** (The Act emphasizes preventive awareness. So, each IC will list how many trainings or sensitization sessions were conducted for employees, and perhaps for IC members' training as well. For example, "2 awareness sessions for all staff at Unit X, and 1 special training for IC members" etc.)
5. **Nature of action taken by the employer or District Officer in cases.** (This part summarizes outcomes – e.g., "One case: respondent warned; second case: respondent terminated; third case: complaint withdrawn via conciliation;" etc. It may also note if any cases were forwarded to police or dealt by District Officer.)

This Annual Report for the IC is distinct from the company's Annual Report to shareholders, but the Company must file it with the District Officer of the area. Typically, the report is prepared for the **calendar year (January–December)** and submitted by January of the following year. (Many state rules expect submission by 31st January). Internally, HR will remind all ICs at year-end to compile their data. The report should be signed by the Presiding Officer of the IC. One copy remains with the Company (HR files), and another is sent to the District Officer (usually the District Magistrate/Collector or an official designated as such under the Act for the local district).

If the Company has multiple ICs, either each sends to the District Officer of their respective location, or a consolidated report is forwarded to each relevant District Officer covering information of units in their jurisdiction. We will follow the locally applicable protocol. The content can be minimal (just the numbers) unless the state authority provides a format.

**Audit Readiness of Reports:** The Company should be ready to produce these annual reports as proof of compliance. Not submitting the annual report to the District Officer can attract penalties. The IC annual reports are internal documents but can be requested by labour

inspectors to verify compliance. We maintain copies of reports submitted and any acknowledgment from the District Officer's office.



### Disclosure in Company's Annual Report (Board of Directors' Report)

As a listed entity, Solve Plastic Products Ltd. is required to give a statement in its Annual Report (specifically in the Board of Directors' Report that accompanies financial statements) that it has complied with the POSH Act. The Ministry of Corporate Affairs via a 2018 amendment to the Companies (Accounts) Rules made this mandatory. The Board's report should include a declaration that: *"The Company has in place an Internal Complaints Committee under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and that the Company has complied with provisions of the Act, along with details of the number of cases filed and disposed during the year."* Often, companies include a short paragraph mentioning how many complaints were received and resolved in the financial year. For example, it might state: "During the financial year, the Company received 1 complaint of sexual harassment, which has been investigated and resolved as per the POSH Act. No cases were pending as on year-end. The Company's Internal Committees are duly constituted and functional." If no complaint was received, it would say "no cases were reported."

This disclosure serves to inform shareholders and regulators that the Company is compliant and has a safe workplace. Not making this disclosure can result in penalties under the Companies Act (fines on the company and officers). The HR or Compliance officer will ensure that these details are communicated to the Company Secretary in time for drafting the Board report each year. We will use the data from the IC's annual reports for accuracy.

### External Audit and Inspection Readiness

From time to time, the Company may be subject to labour law inspections or audits (for example, a Labour Commissioner's office might check POSH Act compliance, or an internal audit by the Company's compliance team or an external agency might review HR compliance). The following measures ensure that we are always "audit-ready":

- 
**POSH Compliance Checklist:** The HR Compliance team maintains a POSH checklist including: IC constitution orders (with current member names and dates of appointment), training records, copies of this POSH policy circulation (e.g., email to all staff, notices on boards), sample payslip or notice showing external member honorarium paid (if any), etc. This shows we have set up the mechanism. The checklist also covers case handling: whether any case was handled in last year and if all steps (notice, inquiry, report, action, etc.) were documented.
- 
**Display and Notices:** Auditors may check that the workplace displays required information (like the POSH policy abstract and IC members' contact details). We will

ensure that at each unit, a notice board or intranet page has up-to-date IC member details and a statement of zero tolerance.



- **Training records:** Keep evidence of employee trainings (dates, topics, attendance or e-learning completion data) and IC trainings. These demonstrate our preventive efforts.



- **Annual Report filings:** Keep copies of all Annual reports sent to District Officers (and any proof of submission like postal receipt or email). Also keep a copy