



SPECTRON

Prevention of Sexual Harassment (POSH) Policy

(Gender-Inclusive Workplace Policy)

Effective Date: 05.01.2026

Revision: 01

Approved By: Management

Applicability: All employees, consultants, trainees, interns, vendors, and visitors across functions and locations

1. Purpose

The purpose of this policy is to provide a **safe, respectful, and harassment-free workplace** for all individuals, irrespective of gender, and to prevent, prohibit, and redress sexual harassment at the workplace in accordance with applicable law and Company values.

2. Scope

This policy applies to:

- All employees (male, female, transgender, and non-binary)
- Contractual staff, consultants, interns, trainees
- Vendors, clients, customers, and visitors
- All workplaces including offices, factories, sites, client locations, and virtual/online workspaces

3. Legal Framework & Policy Equilibrium

- The **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** ("POSH Act") is a **women-centric statute** and remains fully applicable.
- The Company, as a matter of **equity, dignity, and fairness**, extends **internal protection against sexual harassment to all genders**.
- Complaints filed by women shall be handled **strictly as per the POSH Act**.
- Complaints filed by men or other genders shall be addressed under this **gender-inclusive internal policy**, following principles of natural justice.

4. Definition of Sexual Harassment

Sexual harassment includes **any unwelcome act or behavior**, whether direct or implied, such as:

- Physical contact or advances

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An ISO 9001 : 2015 Certified Company

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- Sexually colored remarks or jokes
- Display of sexually explicit material
- Requests for sexual favors
- Verbal, non-verbal, written, or digital conduct of a sexual nature
- Threats, coercion, or humiliation linked to sexual conduct

Sexual harassment can occur **between any genders** and **at any level**.

5. Aggrieved Person

For the purpose of this policy:

- **Women employees** are “aggrieved persons” under the POSH Act.
- **All other genders** are considered aggrieved persons under the Company’s internal grievance redressal mechanism.

6. Internal Complaints Committee (ICC)

The Company shall constitute an **Internal Complaints Committee (ICC)** as mandated by the POSH Act, consisting of:

- A Presiding Officer (senior woman employee)
- At least two employee members
- One external member with relevant expertise

The ICC shall:

- Handle complaints from women strictly under the POSH Act
- Handle complaints from other genders under this internal policy using the same procedural fairness

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7. Filing a Complaint

How to Apply / Report

1. A complaint may be filed **in writing or via email** to the ICC within **3 months** of the incident.
2. Assistance shall be provided if the complainant is unable to file the complaint in writing.
3. Complaints may also be filed by:
 - Legal heirs (in case of death)
 - Authorized representatives (where applicable)

8. Inquiry Process

- The ICC shall conduct a **fair, unbiased, and confidential inquiry**.
- Both parties shall be given a reasonable opportunity to be heard.
- The inquiry shall be completed within **90 days**.
- Findings and recommendations shall be submitted to Management.

9. Confidentiality

Strict confidentiality shall be maintained regarding:

- Identity of complainant and respondent
- Contents of the complaint
- Inquiry proceedings and outcome

Any breach of confidentiality may attract disciplinary action.

10. Protection Against Retaliation

The Company strictly prohibits:

- Retaliation
- Victimization
- Threats or intimidation

Any such act shall be treated as a serious misconduct.

11. False or Malicious Complaints

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- A complaint shall not be considered false merely because it is not proven.
- However, **malicious or knowingly false complaints** may attract disciplinary action after due inquiry.

12. Disciplinary Action

Based on the ICC's findings, actions may include:

- Written warning
- Mandatory counseling or training
- Suspension or termination
- Any other action as per Company policy

13. Awareness & Training

- Regular POSH awareness programs shall be conducted.
- All employees shall be sensitized on **gender-neutral dignity and respectful behavior**.

14. Statutory Compliance

This policy is framed in accordance with:

- **POSH Act, 2013**
- Principles of natural justice
- Applicable labour laws and judicial precedents

15. Policy Review & Amendment

The Company reserves the right to amend this policy to align with legal developments and organizational needs.

Employee–HR Communication on POSH Policy

Employee: Is this policy only meant to protect women employees?

HR Representative: While the POSH Act is a women-centric law, our Company policy protects **all employees, regardless of gender**, against sexual harassment.

Employee: Can a male employee file a complaint if harassed by a female colleague?

HR Representative: Yes. Any employee can raise a complaint. Women's complaints are handled under the POSH Act, and complaints by other genders are handled under our internal grievance mechanism with the same seriousness and fairness.

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Employee: Will complaints remain confidential?

HR Representative: Absolutely. Confidentiality is a core principle of this policy, and any breach is taken very seriously.

Employee: Thank you. This feels fair and inclusive.

HR Representative: You're welcome. Our goal is to ensure dignity, respect, and safety for everyone at the workplace.

Yours Sincerely,

For **Spectron Engineers Pvt. Ltd.**

Authorised Signatory

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