



SILVER TOUCH TECHNOLOGIES LIMITED
[CIN: L72200GJ1995PLC024465]

POLICY FOR PREVENTION OF SEXUAL
HARRASMENT OF WOMEN
[In Compliance as per (Prevention, Prohibition and Redressal) Act, 2013]

REVISION HISTORY

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1. INTRODUCTION:

1. We at Silver Touch Technologies Limited (which includes our affiliates and subsidiaries, hereinafter referred to as the “Company”) have zero-tolerance for Sexual Harassment. We value every single Staff working at the Company and wish to protect their dignity. In order to do so, we are determined to promote an environment where all individuals are treated as equals.
2. Silver Touch Technologies Limited (the “Company”) is therefore committed to creating a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias and sexual harassment.
3. Accordingly, this Policy has been framed with the intention of preventing Sexual Harassment at workplace, that includes prohibition and redressal of sexual harassment should it occur.
4. At the Silver Touch group, all employees are expected to uphold the highest standards of ethical conduct at the workplace and in all their interactions with business stakeholders. This means that employees have a responsibility to:
 - Treat each other with dignity and respect
 - Follow the letter and spirit of law
 - Refrain from any unwelcome behaviour that has sexual connotation (of sexual nature)
 - Refrain from creating hostile atmosphere at workplace via sexual harassment
 - Report sexual harassment experienced and/or witnessed to appropriate authorities and abide by the complaint handling procedure of the company.
5. This Policy is framed in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act" or "the Act"), the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("POSH Rules"), the constitutional guarantees under Articles 14, 15, 19(1)(g) and 21 of the Constitution of India.

2. OBJECTIVE:

1. The Primary objectives of this Policy are to:
 - a) Provide a safe, respectful, and dignified work environment to all employees, irrespective of their gender, employment status, location, or hierarchy;
 - b) Prevent and prohibit sexual harassment at the workplace in any form;

c) Lay down a clear, time-bound, and confidential mechanism for receiving, investigating, and redressing complaints of sexual harassment;

d) Constitute an Internal Committee (IC) in compliance with Section 4 of the POSH Act;

e) Sensitise all employees, contractors, vendors, clients, interns, and visitors about acceptable workplace conduct;

2. The Company is also committed to promoting a work environment that is conducive to the professional growth of its employees and encourages equality of opportunity. The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment when they are working in the Company.

3. SCOPE AND COVERAGE:

This policy is applicable to all Employees of the Company in India. Local country laws will take precedence over this policy, in other geographies, if applicable.

This policy considers the definition of Right to life, under the Constitution of India. It means the right to life with dignity and the fundamental right to carry on any occupation, trade or profession, which depends on the availability of a "safe" working environment where employees feel secure and truly believe that their dignity is maintained.

This policy takes complete cognizance of the latest legislation by the Government of India "The Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act 2013 and its rules notification published on 9th December 2013. This Act is to provide protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment and for the matters connected herewith or incidental thereto.

This policy applies to all categories of employees of the Company, including permanent, temporaries, trainees and employees on contract at their workplace or at customer's sites if any. The Company will not tolerate sexual harassment, if engaged in by customers or by suppliers or any other business associates.

The workplace includes:

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

4. Off-site events, client locations, conferences, training programs, business travel (domestic and international), team outings, official social events, and Company-sponsored online events.
5. Work-from-home / remote work scenarios where any virtual or digital interaction occurs in the course of employment.

4. DEFINITIONS:

Sexual Harassment:

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

- (i) physical contact and advances; or
- (ii) a demand or request for sexual favours; or
- (iii) making sexually coloured remarks; or
- (iv) showing pornography; or
- (v) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;

What Constitute Sexual Harassment:

- Physical contact & advances; or
- Demand or request of sexual favours; or
- Making sexually coloured remarks; or
- Showing Pornography; or
- Any other unwelcome, physical, verbal or non-verbal conduct of sexual nature; or
- Implied or explicit promise of preferential treatment in her employment; or
- Implied or explicit threat of detrimental treatment in her employment; or
- Implied or explicit threat about present and future employment status; or
- Hostile Work Environment; or
- Humiliating treatment likely to affect her health or safety

Employee:

Any person employed at the workplace for any work on regular, temporary, ad-hoc or daily-wage basis, either directly or through an agent (including a contractor), with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise; whether the terms of employment are express or implied. This includes a co-worker, contract worker, probationer, trainee, apprentice, or any person called by any other such name.

Employer:

Silver Touch Technologies Ltd., represented by its Board of Directors, and includes the

person(s) responsible for the management, supervision, and control of the workplace.

Internal Committee:

The committee constituted by the Employer under Section 4 of the POSH Act for the purpose of receiving and inquiring into complaints of sexual harassment.

Aggrieved Individual:

An Aggrieved Individual, 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.

Complainant:

A Complainant is any Aggrieved Individual (if the Aggrieved Individual is unable to make a complaint on account of his/her physical or mental incapacity or death or otherwise) who makes a complaint alleging Sexual Harassment under this Policy.

Respondent:

A Respondent means the person against whom the Complainant has made a complaint.

Workplace:

- ✓ Premises, locations, establishments, enterprises, institutions, offices, branches or units established, owned, and controlled by the Company.
- ✓ Places visited by the Employee arising out of or during the course of employment including transportation provided by the employer for undertaking such journey

5. INTERNAL COMPLAINT COMMITTEE:

Internal Complaints Committee Composition:

- (i) The Company has constituted an Internal Complaints Committee (ICC) – also known as the POSH Committee consisting the following:

- 1) Ms. Syamala Sharma - Chairperson
- 2) Ms. Hely Khandhediya - Member
- 3) Mr. Rahul Advani – Member
- 4) Ms. Anjali Chauhan – Member
- 5) Mr. Rajeev Ranjan – Member
- 6) Mr. Vijay K. Shah (Member from NGO)

- (ii) A member of the ICC may resign at any time by tendering his resignation in writing to the Company.

Removal or Replacement of ICC member or Chairman:

In the event that the Chairman and / or any member of the ICC:

- contravenes any provisions of the Policy; or
- has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against him / her; or
- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him / her; or
- has so abused his / her position as to render his / her continuance in office prejudicial to public interest, such Chairman or member as the case may be, shall be removed from the ICC. Any vacancy created due to cessation of employment, resignation, death, disability or removal, as applicable, shall be filled by a fresh nomination by the Company in accordance with the appropriate guidelines.

6. COMPLAINT:

(A)

1. Any Aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaint Committee within period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of last incidents.

Provided that where such complaint cannot be made in writing, the Chairman or any member of the internal committee or the chairperson shall render all reasonable assistance to the woman for making the complaint in writing.

Provided further that the internal committee for the reason to be recorded in writing, extend the time limit not exceeding three months, if it satisfied that the circumstances were such which prevented the woman from filing a complaint within the said period.

2. Where the aggrieved woman is unable to make a complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint.

(B)

1. The internal committee may before initiating any inquiry and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation.

Provided that no monetary settlement shall be made on the basis of conciliation.

2. Where the settlement has been arrived, the internal committee shall record the settlement so arrived and forward the same to the employer or the district officer to take action as specified in the recommendation.
3. The internal committee shall provide the copies of the settlement as recorded to the aggrieved woman and the respondent.
4. Where the settlement is arrived, no further inquiry shall be conducted by the internal committee.

7. GUIDELINE:

The contents of the complaint made, the identity and addresses of the Complainant, Respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC and the action taken on the Respondent shall not be published, communicated or made known to the public, press and media in any manner.

However, information may be disseminated regarding the justice secured to any victim without disclosing the name, address, identity or any other particulars calculated to lead to the identification of the Complainant and witnesses.

The Chairperson or any member of the ICC shall render all reasonable assistance to the Complainant for making the complaint in writing.

In case a witness has given false evidence or produced any forged or misleading document during the inquiry, action may be taken against the said witness in accordance with the provisions of the service rules applicable.

The ICC shall ensure that the principles of natural justice are adhered to in relation to the conduct of hearings upon a Complaint and both the Complainant and the Respondent are provided with a fair opportunity to make their submissions.

The contents of the report of ICC shall be kept confidential by ICC and the Company.

Any refusal by any Employee of the Company to attend any hearing before the ICC when summoned or to provide to the ICC, any documents and / or information within his / her power or possession shall constitute a misconduct under the Company's service rules, rendering such Employee for adverse action by the Company.

8. ROLES AND RESPONSIBILITIES:

Employees:

All employees of the Company have a personal responsibility to ensure that their behavior is not contrary to this policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

Following are inclusive responsibilities of employees:

- Be aware of and abide by laws and procedures applicable at the Company.
- Participate in gender sensitization programs and compliance related trainings on prevention of Sexual Harassment through workshops, seminars.
- Respect the rights of others and to never encourage harassment.
- Support/co-operate during any investigation as part of the inquiry process and provide a full and truthful disclosure of relevant information and assist with investigations.
- Come forward as a witness if the person being harassed decides to lodge a complaint.
- Handle information related to known or suspected violations of this policy in a discreet and confidential manner and not attempt to investigate the information or suspected violations of this policy on their own i.e. without involving the IC.
- Set an example of proper workplace behavior and ethical standards in line with values that the Company stands for our Code of Conduct.

The Company:

The Company is responsible for providing a safe working environment for its employees, free from harassment, bias and prejudice of any kind. Towards this end, it will:

- Treat Sexual Harassment as misconduct under the service rules and take appropriate action for the same.
- Encourage respectful and dignified behavior at workplace at all times by all.
- Have zero tolerance towards acts of sexual harassment.
- Declare the names and contact details of all Members of the ICC.
- Organize workshops and awareness programs at regular intervals for sensitizing employees with the provisions of this policy.

Human Resource/HR Team Members:

Human Resource team members have the same responsibilities as the employee and additional responsibilities which includes:

- Make information, policies and procedures available to employees.

- Ensure that employees and stakeholders are communicated properly about Silver Touch POSH policy.
- Set an example of proper and appropriate workplace behavior and ethical standards in line with company's code of conduct.

Internal Complaints Committee:

Internal Complaints Committee members have the same responsibilities as the employees and additional responsibilities includes:

- To be fair while making the assessment of the situation, investigation and giving the verdict.
- Conduct the inquiry process and recommend appropriate actions in line with the statutory requirements applicable.
- Inform the parties involved in the inquiry proceedings well in time and in writing.
- Follow the principles of natural justice and treat the complainant, respondent, witnesses and related persons to the inquiry with dignity and respect.
- Set an example of proper and appropriate workplace behaviour and ethical standards in line with Code of Conduct.

9. PROCEDURE FOR RESOLUTION OF POSH COMPLAINTS:

The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

A. Who Can File a Complaint:

Any Aggrieved Person may file a written complaint of sexual harassment with the IC. Where the Aggrieved Woman is unable to make a complaint in writing on account of physical or mental incapacity, death, or otherwise, her legal heir or any person prescribed under Rule 6 of the POSH Rules may file the complaint on her behalf.

B. Time Limit:

A complaint must be filed within **three (3) months** from the date of the incident, and in the case of a series of incidents, within three (3) months from the date of the last incident.

The IC may, for reasons to be recorded in writing, **extend the time limit by a further three (3) months** if it is satisfied that circumstances prevented the woman from filing within the stipulated period.

C. How to File a Complaint:

A complaint may be filed by:

- a) Submitting six (6) hard copies of the written complaint to the Chairman or any Member of the IC; or
- b) Sending the complaint to the dedicated email ID: speakup-ic@silvertouch.com (or such other ID as may be notified); or
- c) Submitting complaint on “SHE BOX” on the official website of government <https://shebox.wcd.gov.in/>

The complaint shall contain a description of each incident, including date, time, place, name of the Respondent, working relationship, names of witnesses (if any), and supporting evidence (if any).

If the Aggrieved person is unable to put the complaint in writing, the Chairman or any Member of the IC shall render all reasonable assistance to enable her to do so.

Conciliation

Before initiating an inquiry, and at the request of the Aggrieved Woman, the IC may take steps to settle the matter through conciliation between the Aggrieved Woman and the Respondent. However:

- a) No monetary settlement shall be made as the basis of conciliation;
- b) Where a settlement is arrived at, the IC shall record the same and forward it to the Employer for action;
- c) Once a settlement is recorded, no further inquiry shall be conducted by the IC into the same complaint;
- d) Copies of the settlement shall be provided to both parties.

If the Respondent fails to comply with the terms of the settlement, the Aggrieved Woman may approach the IC to proceed with an inquiry.

Inquiry:

1. Subject to the above and in the event of any term or condition of the settlement not been complied with by the Respondent, the ICC shall conduct an inquiry regarding the complaint.

2. On receipt of the complaint, the ICC shall send one of the copies received from the Complainant to the Respondent within a period of seven working days.
3. The Respondent shall file his reply to the complaint along with his list of documents, and names and addresses of witnesses, within a period not exceeding ten working days from the date of receipt of the documents.
4. The ICC shall make an inquiry into the complaint in accordance with the principles of natural justice. The ICC must notify in writing, the time and dates of its meetings to the Company, the Complainant and the Respondent, not less than 5 days in advance of any such meeting.
5. While conducting the inquiry, a minimum of three members of the ICC including the Chairman or Chairperson, as the case may be, shall be present.
6. The ICC shall have the powers to summon and enforce the attendance of any person and conduct an examination, request the discovery and production of documents and / or any other matter which may be prescribed and deemed necessary for the inquiry process.
7. The ICC shall have the right to terminate the inquiry proceedings or to give an ex parte decision on the complaint, if the Complainant or Respondent fails, without sufficient cause, to present themselves, for three consecutive hearings convened by the Chairperson or Chairman. Provided that such termination or ex parte order may not be passed without giving a notice in writing, fifteen days in advance, to the party concerned.
8. The Complainant and the Respondent shall not be allowed to bring in any legal practitioner to represent them in their case at any stage of the proceedings before the complaints committee. However, they may be accompanied by a colleague for psychological or emotional support. Such colleague will not be permitted to speak at or otherwise interfere with the proceedings of the ICC.
9. All colleagues and witnesses who are part of the ICC proceedings will need to sign a confidentiality agreement
10. During the course of inquiry, the Complainant and the Respondent shall be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the ICC.
11. The inquiry shall be completed within a period of ninety days from the date of receipt of the complaint.

10. CONFIDENTIALITY:

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

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

11. AMENDMENT:

The Company reserves the right to amend the Policy from time to time in order to comply with any laws / rules / regulations that come into effect from time to time, related to Sexual Harassment.

12. ANNEXURE

Flow Chart of The Process


