



DIVGI TORQTRANSFER SYSTEMS LIMITED

PREVENTION OF SEXUAL HARASSMENT OF WOMEN (POSH) POLICY

Document Control

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Document Record Sheet

Sr. No.	Revision No.	Date	Description of changes
1	First	November 01, 2023	Change in constitution of Committee Members Pune Facility.
2	Second	May 30, 2025	Change in constitution of Committee Members Pune Facility.

1. INTRODUCTION

Divgi TorqTransfer Systems Limited's ("the Company") quest for competitive excellence consists of our commitment to lawful and ethical conduct and adhering to the Company's Beliefs- Respect for each Other, Power of Collaboration, Passion for Excellence, Personal Integrity & Responsibility to our Communities.

The Company is committed to providing to all its employees an environment free of gender based discrimination. In furtherance of this commitment, the Company strives to provide all its employees with equal opportunity conditions of employment, free from gender-based coercion, intimidation, or exploitation. The Company is dedicated to ensure enactment, observance and adherence of guidelines and best practices that prevent and prosecute commission of acts of sexual harassment.

Sexual harassment at the workplace results in violation of the fundamental rights of women to equality under Articles 14 and 15 of the Constitution of India, to life and to live with dignity under article 21 of the Constitution and to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. Protection against sexual harassment and the right to work with dignity are universally recognised human rights by international conventions and instruments such as Convention on the Elimination of all Forms of Discrimination against Women, which has been ratified on 25 June 1993 by the Government of India.

This Sexual Harassment Policy has been formed to prohibit, prevent or deter the commission of acts of sexual harassment at the workplace and to provide the procedure for the redressal of complaints pertaining to sexual harassment.

2. SCOPE AND APPLICABILITY:

This policy covers all categories of employees working at the factory premises and facilities of Divgi TorqTransfer Systems Limited including permanent and temporary employees, contractual/outsourced employees/probationer/trainee any employee on adhoc or daily wages either directly or through any agent or individuals coming to workplace for any purpose but not limited to visitors, vendors or contractual resources. An alleged act of Sexual Harassment committed during or outside of office hours also falls under the purview of this policy. The sexual harassment shall not be tolerated, if engaged in by clients or suppliers or any other business associates.

3. OBJECTIVE

The objective of the sexual harassment policy is to prevent and redress complaints of sexual harassment which may include but not limited to:

- a. Implied or overt promise of preferential treatment of his/her employment in the Company; or
- b. Implied or overt threat of detrimental treatment of his/her employment in the Company;

- c. Implied or explicit threat about his/her present or future employment status; or
- d. Conduct of any person which interferes with his/her or creates an intimidating or offensive or hostile work environment for his/her; or
- e. Humiliating conduct constituting health and safety problems for his/her.

4. SEXUAL HARASSMENT

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

- a. Physical contact and advances; or
- b. A demand or request for sexual favours; or
- c. Making sexually coloured remarks including but not limited to vulgar/indecent jokes, letters, phone calls, text messages, e-mails, gestures, etc; or
- d. Showing pornography; or
- e. Any other unwelcome physical verbal or non-verbal conduct of sexual nature.
- f. Physical contact and advances such as touching, stalking, sounds which have explicit and/or implicit sexual connotation/overtones, molestation, etc.;
- g. Display of pictures, signs, etc. with sexual nature/ connotation/ overtones in the work area and work related areas;
- h. Verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature;
- i. Teasing, innuendos and taunts, physical confinement and/or touching against one's will and likely to intrude upon one's privacy.

The following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:

If you are being harassed:

- a. Inform/Intimate the respondent that his/her behavior is obnoxious and ask him/her to stop.
- b. Keep a record of incidents (dates, times, locations, possible witness, what happened, your response). It is not mandatory to have a record of events to file a complaint, but a record can strengthen your case and help you remember the details over time, in case the complaint is not filed immediately.

- c. File a complaint as soon as possible with the Sexual Harassment Internal Complaints Committee. If, after asking the accused to stop his/her behavior, the harassment continues, report the abuse to the Sexual Harassment Internal Complaints Committee formed for this purpose.

5. INTERNAL COMPLAINTS COMMITTEE AND COMPLIANCES UNDER THE ACT:

- a. For the purpose of addressing complaints related to the sexual harassment, the Company has formed a Internal Complaints Committee (ICC) for all our facilities as provided in Annexure-A and Annexure-B headed by a “female presiding officer”.
- b. Training Programme: Orientation and training programmes are also required to be carried out by the organisation.
- c. Annual Report to District Officer: To file an annual report with the information of the number of sexual harassment complaints received in a year, the number of complaints disposed of in a year, cases pending for more than 90 days, etc.
- d. Reporting under Directors report that the company has complied with the provisions regarding the constitution of the Internal Complaints Committee (ICC) and include the Annual Report to District Officer in the Annual Report of the Company filed to Registrar of Companies.

6. ACTION DURING PENDANCY OF INQUIRY

- 1) The Committee shall ensure that victims or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.
- 2) During the period of enquiry, based on a request from the victim, the ICC may recommend the Company to:
 - a. Transfer the victim/respondent to another location/work place.
 - b. Grant leave to the victim up to a period of three months (In addition to the leave otherwise entitled).
 - c. Restraint the respondent from reporting on the work performance of the Aggrieved Individual or writing his/her confidential report and assign the same to another officer.
 - d. Grant any other relief as found suitable by ICC.

7. RESPONSIBILITIES OF SHCC

- a. To oversee the steps taken by the Company to provide a safe work environment at the Company Premises.
- b. To deal with sexual harassment complaints and complete the enquiry within least possible time.
- c. To maintain the records of the grievances filed.

8. PROCEDURE:

1) COMPLAINT REGISTER:

An aggrieved employee may make a complaint of sexual harassment at workplace to the SHCC in writing provided that where such complaint cannot be made in writing, the chairperson or any member of the SHCC will render all reasonable assistance to the employee making the complaint to reduce the same in writing.

2) CONCILIATION

At request of aggrieved employee the SHCC may be before initiating enquiry take steps to settle the matter between her and respondent **through conciliation**. However, no monetary settlement shall be made as a basis of conciliation.

Where a settlement is arrived, the committee shall record the settlement and forward the same to the Company to take such action as specified in the recommendation.

3) ENQUIRY CONCLUSION:

- a. In all other cases, as well as in cases where the aggrieved employee informs the SHCC that the terms or conditions of conciliation have not been complied with by the respondent, the SHCC shall proceed to make enquiry into the complaint.

➤ INQUIRY PROCESS :

1. The SHCC would carry out an inquiry into the complaint received. For the purpose of this inquiry, SHCC shall nominate two (2) or three (3) persons from amongst its members as the SHCC.
2. The SHCC has same powers for making enquiry as vested in a civil court when trying a suit for certain matters:
 - Summon and enforce the attendance of any person and examine him on oath.
 - Require the discovery and production of documents.
 - make the enquiry in accordance with the principles of natural justice

3. The IC 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 Presiding Officer. 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.
 4. 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 SHCC.
 5. The inquiry shall be completed within a period of ninety days from the date of receipt of the complaint. On completion of the enquiry, the SHCC shall provide a report of its findings to the Company.
 6. The report of the Committee shall be provided to both the parties.
- b. In case the SHCC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Company that no action is required to be taken in the matter.
 - c. In case the SHCC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Company to take action for sexual harassment as a misconduct in accordance with the provisions of the service rules applicable to the respondent. The SHCC shall recommend to the Company to take such action including written apology, warning, reprimand or censure, withholding of promotion, withholding of pay rise or increments, termination of service, undergoing counselling session or carrying out community service or any other such suitable remedy.
 - d. Regardless of the outcome of a complaint made in good faith, the aggrieved employee or the person lodging the complaint and any person providing information or any witness, shall not be subject to any form of retaliation.
 - e. The details of all complaints, and information pertaining thereto, including the enquiry shall be kept confidential.

9. MALICIOUS COMPLAINT:

This policy has been evolved as a tool to ensure that in the interest of justice and fair play, our employees have a forum to approach in the event of instances of sexual harassment. However, if on investigation, it is revealed that the complaint was made with a malicious intent and with the motive of maligning the concerned individual/tarnishing his/her image in the company and to settle personal/professional scores, strict action will be taken against the complainant.

10. TIMELINES:

The crucial timelines that should be adhered to, by the aggrieved employee and the Company with regard to a complaint of sexual harassment:

- a. A written complaint has to be filed by the aggrieved woman (or such other person as stated above) within (3) three months of the date of the incident and in case of a series of incidents, within a period of three months from the date of last incident;
- b. The SHCC may, for the reasons to be recorded in writing, extend the time limit not exceeding three (3) months on being satisfied that the circumstances were such that prevented the aggrieved employee (or other person, as the case may be) from filing a complaint within the said period.
- c. The SHCC shall complete the inquiry within 90 days.
- d. The inquiry report has to be issued within 10 days from the date of completion of the inquiry;
- e. Company shall act on the recommendations of the SHCC within 60 days of receipt of the Inquiry report; and
- f. Appeal against the decision of the SHCC is allowed within 90 days of the date of recommendations to the authority as provided under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the rules made thereunder.

11. INTERIM RELIEF TO AGGRIEVED EMPLOYEE:

During the pendency of an inquiry, on a written request made by an aggrieved employee, the SHCC may recommend to transfer the aggrieved woman or the respondent employee to any other workplace; or grant such other relief to the aggrieved woman employee as may be prescribed.

12. CRIMINAL PROCEEDINGS

Where sexual harassment amounts to a specific offence under the Indian Penal Code, 1860 or under any other applicable law in India, the Management shall initiate appropriate action, in accordance with law in India, by making a complaint with the appropriate authority.

13. MODIFICATION AND REVIEW OF THE POLICY

The Company reserves the right to modify and, or, review the provisions of this Policy, so as to comply with applicable legal requirements in India, internal policies, or with a view to fine tune or alter the provisions of this Policy to the extent deemed necessary by the Company from time to time.

14. AWARENESS

Awareness sessions are to be organized to:

- a. Formulate and widely disseminate an internal policy or charter or resolution or declaration for prohibition, prevention and redressal of sexual harassment at the workplace intended to promote gender sensitive safe spaces and remove underlying factors that contribute towards a hostile work environment against women.
- b. Carry out orientation programs and seminars for the Members of the IC.
- c. Conduct capacity building and skill building programs for the Members of the IC.
- d. Declare the names and contact details of all the Members of the IC.
- e. Use modules developed by the State Governments to conduct workshops and awareness programs for sensitizing the employees with the provisions of the Act.

In the event of any conflict between the provisions of this Policy and of the Act or Listing Regulations or any other statutory enactments, rules, the provisions of such Act or Listing Regulations or statutory enactments, rules shall prevail over this Policy. Any subsequent amendment/modification in the Listing Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy.

REVISION HISTORY

Annexure A

Committee Members Pune Facility (Bhosari, Shivare and Shirwal) are as under:

Sr. No	Committee Members Name	Designation
1.	Reshma Borde	Presiding Officer
2.	Gopal Dalvi	Member
3.	Raksha Kamat	Member
4.	Ishita Kokare	Member
5.	Jyothi Divgi	External Member

Annexure B

Committee Members Sirsi Facility are as under:

Sr. No	Committee Members Name	Designation
1.	Jyoti B Divgi	Chairperson
2.	Muralidhar Nagarkatte	Member
3.	Prasanna Deshpande	Member
4.	Shakuntala Arur from the Group Co.	Member
5.	Smita Shanbhag	Member