



**CHAUDHARY TIMBER INDUSTRIES PVT. LTD.**

**PREVENTION OF SEXUAL HARASSMENT OF  
WOMEN AT WORKPLACE POLICY**

**(POSH POLICY)**

**of**

**CHAUDHARY TIMBER INDUSTRIES PRIVATE  
LIMITED (CIN - U36100DL2007PTC161558)**

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## PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (CSR) POLICY

### **1. PURPOSE**

- This document describes the Prevention of Sexual Harassment of Women at Workplace Policy (“POSH Policy”) of Chaudhary Timber Industries Private Limited CIN - U36100DL2007PTC161558 (“CTIPL” or “the Company”).
- CTIPL is committed to providing a work environment free from harassment of any kind and in particular, a work environment that does not tolerate sexual harassment. We respect dignity of everyone involved in our work place, whether they are employees, suppliers or our customers. We require all employees to make sure that they maintain mutual respect and positive regard towards one another.
- The POSH Policy has been formulated in accordance with the provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

### **2. SCOPE**

All employees, agents, partners, vendors and consultants working for the Company.

### **3. DEFINITIONS**

- **Aggrieved Woman:** A woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.
- **Employee:** A person employed at a 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 and includes a co-worker, a contract worker, probationer, trainee, apprentice.

- **Employer:** It refers to the:
  - The head of the department, organisation, undertaking, establishment, enterprise, institution, office, branch or unit of the Appropriate Government or local authority or such officer specified in this behalf.
  - Any person (whether contractual or not) responsible for the management, supervision and control of a designated workplace not covered under clause (i).
  - A person or a household who employs or benefits from the employment of domestic worker or women employees.
  
- **Work Place:** It includes all places of work including Branch Offices, Head Office, Warehouse and any other establishments of the Company.
  
- **Sexual Harassment:** It includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication) namely: —
  - Physical contact and advances; or
  - Demand or request for sexual favour; or
  - Making sexually coloured remarks; or
  - Showing pornography or
  - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

#### 4. POLICY STATEMENT

- a) All CTIPL employees will maintain high standards of dignity, respect and positive regard for one another in all their dealings.
- b) All CTIPL employees are required to maintain a work environment which is free from any kind of harassment or will refrain from committing any acts of sexual harassment at work place.
- c) Allegations of sexual harassment will be dealt seriously, expeditiously, sensitively and with confidentiality.
- d) All CTIPL employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

## 5. INTERNAL COMPLAINTS COMMITTEE (ICC)

- a) An Internal Complaints Committee (ICC) shall be set up by the Company to address any complaints of workplace harassment.
- b) The Committee shall consist of the following members:

Member	Eligibility
Presiding Officer	Women employed at senior level, if not available then nominated from other offices or units of the workplace or some other workplace of the employer
2 Members (minimum)	From amongst employees committed to the cause of women or having legal knowledge or experience in social work
1 External Member	From amongst NGO or associations committed to the cause of women or a person familiar with the issue of Sexual Harassment

- c) The Presiding Officer and every member of the Internal Committee can hold office for a period not exceeding three years, from the date of their nomination.
- d) A minimum of 3 Members of the ICC including the Presiding Officer are to be present for conducting the inquiry.
- e) The names of ICC members of each workplace are displayed on the notice board on the respective workplaces along with the contact details of person responsible for hearing all the sexual harassment complaints of each workplace of the employer.

## 6. POWER OF INTERNAL COMPLAINTS COMMITTEE

POSH Act enumerates the powers of the ICC.

1. It is entitled to initiate an inquiry into the complaint of a sexual harassment incident at the workplace.
2. It can summon witnesses and parties before the committee to give a statement.

3. It can assert its powers and summon evidence to be examined if it is deemed necessary to do so by the Committee.

Once the inquiry is completed and if the Internal Committee finds the person guilty, it is well within its right to prescribe the following actions:

1. Initiate action against the culprit in accordance with the service rules of the organization.
2. In the absence of service rules, it can take actions like a warning, community service, withholding promotion, termination, etc.
3. It can deduct from the salary of the respondent as compensation to be paid to aggrieved women.

The POSH Act also lays down the criteria based on which the ICC shall calculate the amount of compensation payable. The factors are:

1. The extent of pain, suffering mental trauma, and emotional distress caused to the aggrieved woman.
2. Loss in a career opportunity for the victim resulting from the incident of sexual harassment.
3. Medical expenses incurred by the complainant towards the physical and/or psychiatric treatment due to this incident.
4. Last but not the least, the alleged perpetrator's Income and status.

All such payment can be given to the aggrieved women as a lump sum or in instalments, as is considered judicious by the ICC.

## **7. PROCEDURE FOR FILING A COMPLAINT**

- a) A complaint of sexual harassment at the workplace must be made by the Aggrieved Woman in writing to the ICC within three months from the date of occurrence of an incident. In case of a series of an incident, within three months from the date of the last incident.
- b) The ICC also has the power to extend the time limit for reporting by not more than three months, if it is satisfied that the circumstances were such that prevented the employee from filing a complaint within the three months. If

an Aggrieved Woman is unable to make a written complaint on account of her physical or mental incapacity or her death or otherwise, her legal heir or such other person as may prescribe may make a complaint.

#### **8. PROCESS TO BE FOLLOWED BY ICC**

- a) On receipt of the complaint, the ICC would initiate a preliminary inquiry to evaluate if there is a prima facie case or not.
- b) Post establishment of a prima facie case, the ICC will seek an explanation in writing from the Respondent after providing him with a copy of the complaint. Mere filing a complaint does not mean either respondent is guilty, or the complaint is false, and it is subjected to impartial inquiry and the evidence that is made available to the ICC both by the production of documents & witnesses during the inquiry.
- c) Post receipt of a reply from the Respondent, ICC may before initiate an inquiry and at the request of the Aggrieved Woman, take steps to settle the matter between the Aggrieved Woman and the Respondent, through conciliation, provided that no monetary settlement shall be made as a basis of conciliation. Where a conciliation settlement arrives, no further inquiry shall be conducted by ICC.
- d) If conciliation fails, or if Aggrieved Woman insists on an inquiry, the ICC will initiate a detailed inquiry and submit the report with recommendations or punishments to the Respondent or close the case with reasoned findings or action against the complainant for false complain. The ICC will maintain utmost secrecy as regards the identity of the Complainant, Respondent, and Witnesses, content of the complaint, entire proceedings of probe, conciliation or inquiry, etc.
- e) The inquiry shall be completed within ninety days.

#### **9. FALSE/ MALICIOUS COMPLIANT AND FALSE EVIDENCE**

An allegation of sexual harassment is a serious charge and hence employees should refrain from making false claims or allegations of such harassment. If the allegation against the respondent is malicious and/or any false/ misleading documents/ statements are produced during the inquiry, appropriate disciplinary action would be taken against the complainant.

## 10. CONFIDENTIALITY

Complaints of sexual harassment are handled confidentially with the facts made available only to those who need to know in order to enquire into and resolve the same. ICC members have a responsibility, however, to gather needed information and seek a resolution once given the names of the parties involved. They will try to keep the information discreet unless the danger presented by the alleged harassment is so grave as to justify taking extraordinary steps, such as immediate administrative intervention. It is expected that the respondent will also be discreet and limit conversations about the alleged incident to those who have a role in resolving the complaint.

## 11. APPLICABILITY

The POSH Policy shall become operational immediately. It shall apply to all employees of CTIPL, whether located at Registered office of Delhi or such other places of the company. Any revision in the Policy shall be approved by the Board of Directors.

Any provisions which are not mentioned in the POSH Policy of CTIPL shall be referred from the applicable provisions of The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 with applicable rules.

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POSH POLICY APPROVED BY THE BOARD OF DIRECTORS ON THIS 21<sup>ST</sup> DAY OF APRIL, 2023 AT NEW DELHI

For and on behalf of

**Chaudhary Timber Industries Private Limited**

For Chaudhary Timber Indus. Pvt. Ltd.  
  
Director

For Chaudhary Timber Indus. Pvt. Ltd.

  
Director

**Vishal Nijhawan**  
Director  
DIN: 01102624

**Sunil Nijhawan**  
Director  
DIN: 01162337