



Isgec Heavy Engineering Ltd., Noida

29<sup>th</sup> November 2024

INTERNAL COMPLAINTS COMMITTEE UNDER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE  
(PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

1. As per the POSH act, 2013, the Internal Complaints Committee is re- constituted for **Corporate Offices & businesses located at Noida** location with effect from 1<sup>st</sup> December 2024: -

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| a) Ms. Radhika Arora, CHRO                           | - <b>Presiding Officer</b><br>(M:9971007339) |
| b) Mr. Vivek Kumar Sehgal, Associate Vice President  | - Member<br>(M:9599056467)                   |
| c) Mr. Ram Sharma, Associate Vice President          | - Member<br>(M:9560013421)                   |
| d) Ms. Nupur Bagchi Galhotra, Deputy General Manager | - Member<br>(M:9899599853)                   |
| e) Advocate Meenakshi Yadav                          | - Member (External)<br>(M: 7042896989)       |

2. Main features of "The Sexual Harassment of Women at Workplace ((prevention, prohibition and redressal) act, 2013" are mentioned in the enclosed annexure.

  
Aditya Puri  
Managing Director

**SEXUAL HARASSMENT POLICY****15.17.1 PREAMBLE**

In order to eliminate sexual harassment at the working place, the Employer shall follow a Code of Good Conduct, published in terms of the powers granted by the Basic Conditions of Employment Act (Act 75 of 1997).

In the absence of a Code of Good Conduct, the Employer shall adhere to under mentioned policy, as first worded in the Employment Equity Plan:

- The Municipality will commit itself to the elimination of sexual harassment in the workplace.
- Further more the Municipality will strive to implement procedures that will lead to the creation of workplaces that are free of sexual harassment, where employers and employees respect one another's integrity and dignity, their privacy, and their right to equity in the workplace.
- Further more allegations of sexual harassment will be dealt with seriously, expeditiously, sensitively and confidentially.

**15.17.2 OBJECTIVES**

To make sure that every employee feels safe and protected in terms of their human rights, when they are at the workplace environment

**15.17.3 DEFINITIONS**

In this policy a word or phrase to which a meaning has been assigned in Section 1.0 on definitions has that meaning, unless the context otherwise indicates.

**15.17.4 WHAT IS SEXUAL HARASSMENT**

- i. Sexual harassment includes, but shall not be limited to:
  - A sexual demand, the non-compliance of which could result in certain actions being taken by the harasser;
  - comments or conduct of a sexual nature which that harasser reasonable ought to have known would be objectionable to the harassed employee or person; or
  - comments or conduct of a sexual nature resulting in the creation of a work environment in which the dignity of a person is impaired.
- ii. Sexual harassment may consist of any or all of the following, and may be of a serious or less serious nature;
  - unwanted sexual advances
  - requests for sexual favours in return for employment benefits
  - verbal abuse having sexual overtones



- innuendoes, including remarks or insinuations about a person's sex life or private life;
  - unwanted infringement of an individual's personal space, which leads to discomfort;
  - suggestive comments about a person's appearance, body or clothing;
  - physical contact, including touching;
  - obscene gestures, indecent exposure
  - staring, leering, whistling
  - any physical or computerized display of sexually offensive or explicit material
  - direct sexual propositioning;
  - continued pressure for dates and/or sexual favours;
  - letters or calls of a sexual nature; or
  - any of the above as a form of coercion or blackmail for advancement, or in the event of the recipient's refusal, resulting in a lack of advancement or dismissal.
- iii. In cases of sexual harassment the consequence (not the intentions) is of prime importance. This means that the severity of the harassment is largely determined by the impact it has on the victim and not by the intent of the perpetrator.
- iv. In every instance in which sexual harassment is or could be experienced, employees ought to indicate that they do not approve of what is being said, done or suggested. This is important, since everyone's perception of sexual harassment differs, and what constitutes sexual harassment for one person may not necessarily be experienced as such by another.
- v. Sexual harassment does not refer to behaviour or occasional compliments which are acceptable to the recipient. Neither can the mutual attraction between two persons be regarded as sexual harassment, as this is a private matter between them.

#### 15. 17.5 POLICY GUIDELINES

- i. As sexual harassment is regarded as misconduct, it is the duty of management and employees to take active steps to ensure that employees are not subjected to this form of degradation in the workplace.
- ii. Protection against acts of harassment extends to incidents occurring in or away from the workplace, during or outside of usual working hours, provided that these acts are committed within the course of employment, or have or will have, and adverse affect on the workplace.
- iii. In the case of any allegation of sexual harassment, whether or not it is found to be an incident of sexual harassment, management must ensure that any victimisation that may later result from lodging the complaint is dealt with most

severely. Disciplinary steps will be taken against personnel who victimise or intimidate a complainant.

iv. Disciplinary steps will be taken against employees who lodge false accusations.

v. If the alleged harasser is found not to have committed misconduct, no disciplinary action shall be taken against an employee who has filed a complaint in good faith.

vi. All information must be treated with the utmost confidentiality. Parties involved in an allegation of sexual harassment are, in their own best interest, advised not to discuss the matter with colleagues who are not involved and who are not representing them in the matter.

vii. Training and awareness raising programmes which encourage gender sensitive practices and behaviour will be included in the Municipality education programmes to educate management and employees about the rights and appropriate procedures pertaining to cases of sexual harassment.

#### **15.17.6 OTHER FORMS OF HARASSMENT**

There are other forms of harassment, which equally can cause misery for those who suffer them. Such harassment may occur in any working or teaching environment used by staff including the telephone and electronic communication. It may include:

- Bullying, intimidation, haranguing, threats, abuse or victimization;
- Insults or ridicule about a person's work, attitudes, character or personal life
- Derogatory remarks concerning personal or physical characteristics or appearance.
- Persistent teasing
- Constant unfounded criticism of the performance of work tasks

