



**WALPLAST PRODUCTS PVT. LTD &
GROUP OF COMPANIES**
A 246, T.T.C. Industrial Area, M.I.D.C. Area,
Mahape, Navi Mumbai, MAHARASHTRA, 400701,
INDIA

Page 1 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

Policy on Prevention of Sexual Harassment (POSH) at Workplace

Prepared By	Human Resource Capital	Approved By	Managing Director
Signature	Ms. Archana Pancham	Signature	Mr. Kaushal Mehta

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INDIA

Page 2 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

PREVENTION OF SEXUAL HARASSMENT POLICY

- **COMMITMENT**

Our Company is committed to create a healthy working environment that enables employees devote their best efforts and work without fear of prejudice, gender/caste or any kind of biases, bullying and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Workplace harassment specifically sexual harassment at the workplace or other than work place if involving employees is a grave offence and is, therefore, punishable.

Our organization is also committed to promote a work environment that is conducive to the professional growth of its women employees and encourage equality of opportunity.

The purpose of this policy is to prevent instances of Harassment in the workplace, to address complaints and provide redress, set out procedures for resolution, settlement and/or prosecution of acts of Harassment.

- **APPLICABILITY**

This policy is applicable to all employees (permanent, temporary or contractual), consultants, trainees, volunteers, third parties and/or visitors at all business units or functions of the company – Walplast Products Private Limited, its subsidiaries and/or its affiliated or group companies including transportation provided by employer for undertaking such **journey, across all locations and geographies (collectively termed as 'WALPLAST')**.


- **SCOPE**

This Policy extends to all employees of the Company irrespective of the gender and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. The policy is covered under the Indian Penal Code, 1860; The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Information Technology Act, 2000 and all other applicable acts.

Prepared By	Human Resource Capital	Approved By	Managing Director
Signature	Ms. Archana Panoram	Signature	Mr. Kaushal Mehta

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	WALPLAST PRODUCTS PVT. LTD & GROUP OF COMPANIES A 246, T.T.C. Industrial Area, M.I.D.C. Area, Mahape, Navi Mumbai, MAHARASHTRA, 400701, INDIA	Page 3 of 20	
		Doc. No. WPPL	
	Title- POSH Policy Guide for Employees	Issue No: 01	Issue Date - 08.03.2019
		Rev No: 02	Rev Date - 18.05.2023

- DEFINITIONS & EXPLANATION**

“Aggrieved Person” means in relation to a Workplace, an Employee, who alleges to have been subjected to any act of Sexual Harassment by the Respondent;

1. **“Company”** means Walplast Products Pvt Ltd and group companies;
2. **“Complaint”** means a complaint of Workplace Harassment;

“Employee” means a person employed at a Workplace for any work on regular, temporary, ad hoc or daily wages 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 or called by any other such name;

Explanation: The aforesaid definition of ‘Employee’ shall be used only for the purposes of the Policy and cannot be used to claim rights of an employee conferred by any law for the time being in force;

3. **“Sexual Harassment”** including the following:

Which as per Act Section 2 (n) (i), (ii), (iii), (iv) and (v) under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 includes unwelcome sexually determined behaviour (whether directly or by implication) such as:

- Physical contact and advances
- A demand or request for sexual favours
- Sexually coloured remarks
- Showing pornography
- Any other unwelcome physical or virtual, verbal or non-verbal conduct of sexual nature such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual’s sensibilities and affect her/his performance.

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- Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
- Any conduct that has the purpose or the effect of interfering with the individual's work performance or creating an intimidating, hostile or offensive work environment and/or submission to such conduct is either an explicit or implicit term or condition of employment and /or submission or rejection of the conduct is used as a basis for making employment decisions.
- Conduct of such an act at workplace or outside in relation to an Employee, or vice versa during the course of employment; and
- Any unwelcome gesture by an employee having sexual undertones.
- Any form of virtual abuses.
- Any form uses for abuse i.e. Cyberstalking or using any other form of electronic medium.

This includes verbal/ non-verbal, physical or virtual conduct such as obnoxious comments or utterances, remarks or jokes, letters, phone calls, SMS or emails, gestures, showing pornography, stalking, sounds or display of a nature with sexual overtures. It also includes a demand or request for sexual favours in return for with a promise of work-related favours such as performance appraisals, promotions, transfers, salary increases and employment or any other form of reward or recognition.

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:

- implied or explicit promise of preferential treatment in employment; or
- implied or explicit threat of detrimental treatment in employment: or
- implied or explicit threat about present or future employment status; or
- interference with work or creating an intimidating or offensive or hostile work environment; or
- Humiliating treatment likely to affect health or safety.
- Any kind of unfair treatment/discrimination towards employees.
- Spreading Malicious Rumors.
- Deliberately undermining/maligning a competent employee.

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Walplast Products Private Limited & Group of Companies

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- Deliberately picking on someone and discriminating on account of gender, caste, economic / social background etc.
- The employee cannot be forced to switch on their camera during the video conferencing, virtual meeting or training and learning program, official WhatsApp group/s, official telephone conversations and any other electronic medium unless specifically required.
- The video call should not be allowed or arranged after official working hours of the Company.
- Denying someone organization wide opportunities on account of personal difference.

The definition of sexual harassment shall include any harassment caused to female or male employees. It would also include harassment caused to or by either gender.

4. **“Management Team”** shall mean the person/s vested with the powers to take appropriate action for implementing the decision of the Internal Complaints Committee and shall consist of such officers as designated by the Company from time to time;
5. **“Respondent”** means a person against whom the Aggrieved Person has made a Complaint;
6. **“Third Party”** means any person or persons not on the rolls of the Company but, in the course of work-related activities, interacting with the Company;
7. **“Workplace”** as per section 2 (o) under The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, shall mean any place(s) where an Aggrieved Person is employed or works, or visits in connection with his duties during the course of or arising out of his employment and includes transportation provided by the employer for undertaking such journey and a dwelling place or a house; Additionally, any individual representing the Company in the capacity of an “Employee”, anywhere in India or outside, in existing and potential official engagements, out station travels and conferences, training and capacity building programs, including Company engagements, Company gatherings, and parties, will be considered engaging in external Workplaces of the Company. Also, all official platforms of communication, including but not limited to emails, official discussions forums, video conferencing, official WhatsApp group/s, official

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Walplast Products Private Limited & Group of Companies

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telephone conversations and any other mode of communication used while working from home with internal and/or external stakeholders of the Company will be considered as virtual Workplace for all Employees and the guidelines of this Policy will extend to them as well;

8. **“Team Leaders”** shall mean a team member who may not have any authority over other members but is appointed on permanent or rotating basis to represent the team to the next higher reporting level, make decisions in the absence of a consensus, resolve conflict between team members, and coordinate team effort.

● **RESPONSIBILITIES**

All employees have the responsibility to report any act of workplace harassment to the Internal Complaints Committee. If the employee reports any act of harassment to their manager / team leader / supervisor, they in-turn should pass the report to the said Committee and keep them informed on the incident.

All employees should take special note that, as stated above in Definitions, retaliation against an individual who has complained about Harassment, and retaliation against individuals for cooperating with an investigation of a Harassment complaint is unacceptable and will be actionable.

Each manager has an affirmative duty to maintain his or her department free of harassment and intimidation. A manager who becomes aware of Harassment shall report the incident to the Internal Complaints Committee and take appropriate corrective action to ensure that such conduct is immediately stopped.

○ **Employer’s Responsibility**

1. To provide a safe working environment at workplace.
2. Treat sexual harassment as a misconduct
3. Display at the conspicuous place in the workplace the penal consequence of the sexual harassment.
4. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the Act.
5. Provide necessary facilities to The Internal Complaints Committee for dealing with the complaints and conduct an enquiry.

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Walplast Products Private Limited & Group of Companies

Foundation of Trust

○ **Employee's Responsibility**

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

● **PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE & REPORTING:**

No Employee shall be subjected to Sexual Harassment at any Workplace. If an Employee is being sexually harassed, he/she should:

1. Tell the Respondent that his / her behaviour is unwelcome and ask him/her to stop;
2. Keep a record of incidents (dates, times, locations, possible witness, what happened, Aggrieved Person's response). It is not mandatory to have a record of events to file a Complaint, but a record can strengthen the Aggrieved Person's case and help the Aggrieved Person to remember the details over time, in case the Complaint is not filed immediately;
3. Make, in writing, a Complaint to the Committee within a period of three months from the date of last incident in accordance with the terms of the Policy.
4. The employee may also email the complaint to posh@walplast.com.
5. The employee may also contact his/her Team Leader. Upon being intimidated, the Team Leader shall send an email communication to the Committee, providing all the necessary details of the Complaint.
6. Any act of sexual behaviour, if noticed by any third party may be brought to the notice of the committee or the management. Such acts may be considered as harassment, if quid pro quo or hostile work environment conditions prevail. Otherwise, it could be treated as non- professional behaviour at the workplace and may be dealt with by the company outside the purview of this policy.
7. In both the cases as mentioned in above point 4 and 6, the written complaint/email must provide the details of the incident together with the name/s of the Respondent/s and the Aggrieved Person, as available.

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Walplast Products Private Limited & Group of Companies

Foundation of Trust



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Mahape, Navi Mumbai, MAHARASHTRA, 400701,
INDIA

Page 8 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

● **INTERNAL COMPLAINTS COMMITTEE:**

1. The Internal Complaint Committee (ICC) shall comprise of not less than five members, nominated by the Board of Directors. Provided that at least one-half of the total members so nominated shall be women.
2. The Internal Complaint Committee shall be headed by a woman employed at a senior level at Workplace, who is the Committee's Presiding Officer.
3. The Presiding Officer shall act as the Chairperson of the Meeting. If at any time the Chairperson is not present at the meeting, then members present shall elect one of their members to be Chairperson of the meeting.
4. To prevent the possibility of any undue pressure or influence from senior levels, the Committee involves a third party, either non-governmental organization (NGO) or other body who is familiar with the issue of sexual harassment.
5. The Internal Complaint Committee members can provide the training, seminars or any awareness program to the employees through video conferencing.
6. The Internal Complaint Committee members can conduct the meetings as well as enquiry through video conferencing.

● **COMPLAINT MECHANISM**

1. Complaint to be made in writing:

- i) A Complaint may be made in writing to the Committee as per the format prescribed under Annexure A or shall be send through email communication at posh@walplast.com.
- ii) Alternatively, a complaint can be posted at following mailing address:
Office Address: A/246, TTC Industrial Area, M.I.D.C., Mahape, Navi Mumbai – 400 701.
- iii) The details of the presiding officer and other members of the Committee(s) along with the details of how and where the complaint should be made shall be communicated to all employees/officers of the Company through a special circular.

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Walplast Products Private Limited & Group of Companies

Foundation of Trust

- iv) In case the Aggrieved Person is unable to make the Complaint in writing he/she may approach the presiding officer or any member of the Committee, who shall render all assistance to the Aggrieved Person for making the Complaint in writing.
- v) The Complaint shall be addressed to the Committee and shall contain all the material and relevant details concerning the alleged Sexual Harassment at Workplace including, the name of the Respondent(s) and the name of the Aggrieved Person along with the names and addresses of the witnesses and supporting documents.
- vi) Aggrieved Person's complain will not have any bearing on his/ her employment with the organization.

• **The following persons can make a Complaint:**

- i) Aggrieved Person.
- ii) In case of physical incapacity of the Aggrieved Person the Complaint can be filed by:
- iii) A relative or a friend or a co-worker of the Aggrieved Person; or
- iv) An officer of the National Commission of Women or State Women's Commission; or
- v) Any person who has knowledge of the incident, with the written consent of the Aggrieved Person.
- vi) In case of mental incapacity of the Aggrieved Person the Complaint can be filed by:
- vii) A relative or a friend of the Aggrieved Person; or
- viii) A special educator; or
- ix) A qualified psychiatrist or psychologist; or
- x) The guardian or authority under whose care the Aggrieved Person is receiving treatment or care; or
- xi) Any person who has knowledge of the incident jointly with a relative or a friend of the Aggrieved Person or a special educator or a qualified psychiatrist or psychologist, or the guardian or authority under whose care the Aggrieved Person is receiving treatment or care.
- xii) In case of death of the Aggrieved Person the Complaint can be filed by any person who has knowledge of the incident with the written consent of the legal heir of the Aggrieved Person.

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Walplast Products Private Limited & Group of Companies

Foundation of Trust

xiii) In case the Aggrieved Person is unable to make a Complaint for any reason the Complaint can be filed by any person who has knowledge of the incident with the written consent of the Aggrieved Person.

• **Timeline for making the Complaint:**

- i) A Complaint should be made within a period of three months from the date of the incident and in case of series of incidents, within a period of three months from the date of the last incident.
- ii) Provided that the Committee may, for reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such which prevented the Aggrieved Person from filing a Complaint within the period of three months.

• **CONCILIATION:**

1. The Committee may before initiate an inquiry and at the request of the Aggrieved Person take steps to settle the matter between the Aggrieved Person and the Respondent through conciliation.

Provided that no monetary settlement shall be made as a basis of conciliation.

2. Where a settlement has been arrived at by conciliation, the Committee shall record the settlement so arrived and forward the same to the Management Team to take action as specified in the recommendation.
3. The Committee shall provide the copies of the settlement as recorded under the settlement so arrived to the Aggrieved Person and the Respondent.

4. Where a settlement is arrived at through conciliation no further inquiry shall be conducted by the Committee.

Provided where the Aggrieved Person informs the Committee that any term of the settlement so arrived has not been complied with by the Respondent, the Committee shall proceed to make an enquiry into the Complaint, or as the case may be, forward the Complaint to the police.

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Walplast Products Private Limited & Group of Companies

Foundation of Trust

	WALPLAST PRODUCTS PVT. LTD & GROUP OF COMPANIES A 246, T.T.C. Industrial Area, M.I.D.C. Area, Mahape, Navi Mumbai, MAHARASHTRA, 400701, INDIA	Page 11 of 20	
		Doc. No. WPPL	
	Title- POSH Policy Guide for Employees	Issue No: 01	Issue Date - 08.03.2019
		Rev No: 02	Rev Date - 18.05.2023

- **INQUIRY INTO COMPLAINT:**

- **Manner of Inquiry:**

- i) The Committee shall proceed to make inquiry into the Complaint where the Respondent is an Employee.
- ii) On the receipt of the Complaint, the Committee shall, within seven working days from the date of receipt of the Complaint, send a copy of the Complaint received from the Aggrieved Person to the Respondent.
- iii) The Respondent shall file his reply to the Committee along with the names and addresses of the witnesses and supporting documents within a period not exceeding ten working days.
- iv) The Committee shall make an enquiry into the Complaint in accordance with the principles of natural justice.
- v) The Aggrieved Person 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 Committee.
- vi) In conducting the inquiry, a minimum of two members of the Committee including the presiding officer shall be present.
- vii) The parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the Aggrieved Person and the Respondent to enable them to make representation against the findings before the Committee.
- viii) For the purpose of making an inquiry, the Committee shall have the same powers as are vested in a civil court under the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:
 - summoning and enforcing the attendance of any person and examining him on oath;
 - requiring the discovery and production of documents: and
 - any other matter which may be prescribed.

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Walplast Products Private Limited & Group of Companies			
Foundation of Trust			

- ix) Inquiry to be conducted in a neutral location which provides an environment conducive for both the Aggrieved Person and the Respondent.
- x) The inquiry shall be completed within a period of ninety days.
- xi) This policy is facilitated to all the employees to file the complaint through email communication.
- xii) The Internal Complaints Committee can accept or receive the complaints through email communication.
- xiii) The Internal Complaints Committee can conduct an inquiry by collecting the proofs through email communication or recording video calls, WhatsApp application chats etc.

• **Actions during pendency of Enquiry:**

- i) During the pendency of an inquiry the Committee at the written request of the Aggrieved Person may recommend to the Management Team to:
 - transfer the Aggrieved Person or the Respondent to any other Workplace; or
 - grant leave to the Aggrieved Person up to a period of three months; or
 - restrain the Respondent from reporting on the work performance of the Aggrieved Person or writing his/her confidential report and assign the same to another person.
- ii) During the process of investigation, the Company will ensure no further harassment or victimization happens to either the Aggrieved Person or the Respondent and duties are carried out as normal. The Company will also ensure that there is no proximity at work place between the Aggrieved Person and the Respondent, during the pendency of the Complaint. Necessary work arrangements, including transfer, if necessary, will be made by the Company for this purpose.
- iii) The Committee if so, required may issue appropriate interim orders from time to time recommending the Management Team to issue orders as may be necessary to ensure the safety of the Aggrieved Person and/or the witnesses.
- iv) On recommendations of the Committee, the Management Team shall implement the recommendations of the Internal Complaints Committee.

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	WALPLAST PRODUCTS PVT. LTD & GROUP OF COMPANIES A 246, T.T.C. Industrial Area, M.I.D.C. Area, Mahape, Navi Mumbai, MAHARASHTRA, 400701, INDIA	Page 13 of 20	
		Doc. No. WPPL	
	Title- POSH Policy Guide for Employees	Issue No: 01	Issue Date - 08.03.2019
		Rev No: 02	Rev Date - 18.05.2023

- **Termination of Inquiry Proceedings / Ex parte Decision:**

i) The Committee shall have the right to terminate the inquiry proceedings or give an ex parte decision on the Complaint, if the complainant or Respondent fails, without enough use, to present herself or himself for three consecutive hearings conveyed by the presiding officer of the Committee.

Provided such termination or ex parte order shall not be passed unless a fifteen days prior written notice has been given to the party concerned.

- **INQUIRY REPORT**

1. On the completion of the inquiry, the Internal Complaints Committee shall provide a report of its findings to the Management Team within a period of ten days from the date of completion of the inquiry and such report shall be made available to the parties concerned.
2. The Committee may recommend a detailed and reasoned order, which may include:
 - i) Recommending to the Management Team to take appropriate action for Sexual Harassment as a misconduct in accordance with the HR Manual / terms of employment and/or payment of compensation, commensurate with the gravity of the offence of which the Respondent has been found guilty of as per applicable law;
 - ii) Recommending to the Management Team steps necessary and reasonable to assist the Aggrieved Person in terms of support and preventive action where Sexual Harassment at Workplace has occurred as a result of an act or omission by any Third Party or outsider;
 - iii) Recommending to the Management Team appropriate disciplinary action against the person making the Complaint, in case the Complaint registered is found to be frivolous or false or was made with a malicious intention;
 - iv) Recommending to the Management Team that no action is required to be taken in the matter, in case it arrives at the conclusion that the allegation against the Respondent has not been proved.
3. Management Team shall act upon the recommendation within sixty days of its receipt by him.

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Signature	Ms. Archana Pancham	Signature	Mr. Kaushal Mehta
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Foundation of Trust			



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A 246, T.T.C. Industrial Area, M.I.D.C. Area,
Mahape, Navi Mumbai, MAHARASHTRA, 400701,
INDIA

Page 14 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

- **POSSIBLE DISCIPLINARY ACTIONS ARISING OUT OF THE RECOMMENDATIONS**

1. A letter of warning that will be placed in the personal file of the Respondent.
2. Immediate transfer or suspension without pay or both.
3. Fine equivalent to 2-4 months' salary that can be credited to a fund created to be utilized for the welfare of the employees.
4. Stoppage of increment with or without cumulative effect.
5. Reduction in rank.
6. Termination/dismissal from the services of the Company.
7. Any other action that the Disciplinary Authority may deem fit.
8. Filing a Complaint before the relevant police station/Court.

- **CONFIDENTIALITY:**

- Information generated in the course of informal reviews and formal investigations necessary for enforcing this Policy will be given the full extent of confidentiality to Employee personnel records.
- Any person who, without authorization, reveals such information will be subject to disciplinary action.
- The sharing of the content of the complaints will be on a "need to know" basis only.
- It is understood that sexual harassment is an issue of highly sensitive nature and therefore strict confidentiality will be maintained by the Aggrieved Person, defendant, witnesses, the Complainant Committee.

- **PROTECTION AGAINST RETALIATION**

- Regardless of the outcome of the Complaint made in good faith, the Aggrieved Person lodging the Complaint and any person providing information or any witness, will be protected from any form of retaliation.
- While dealing with Complaints, the Committee shall ensure that the Aggrieved Person or the witness are not victimized or discriminated against by the accused.

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Walplast Products Private Limited & Group of Companies

Foundation of Trust

- Any unwarranted pressures, retaliatory or any other type of unethical behavior from the accused against the Aggrieved Person while the investigation is in progress should be reported by the Aggrieved Person to the Committee as soon as possible.
- Disciplinary action will be recommended by the Committee to the Management Team against any such Complaints.

● **COMPLAINTS MADE WITH A MALICIOUS INTENT:**

- The Policy has been evolved as a tool to ensure that Employees have a forum to approach the Company in the event of instances of Sexual Harassment at Workplace.
- Where the Committee arrives at the conclusion that the allegation against the Respondent is malicious or the Aggrieved Person or the person making the Complaint has made the Complaint knowing it to be false or the Aggrieved Person or any other person making the Complaint has produced any forged or misleading documents, it may recommend appropriate disciplinary actions against the complainant
- The persons who are victims of such frivolous or false complaints may, in addition to the above, seek legal remedies as may be provided under the various laws for the time being in force.

● **ACCESS TO REPORT AND DOCUMENTS**

All records of complaints, including contents of meeting, results of investigations and other relevant material will be kept confidential by organisation except where disclosure will be subjected to disciplinary or other remedial process.

● **PROTECTION TO COMPLAINANT /VICTIM**

- Organisation is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.
- Organisation will ensure that victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment.

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Page 16 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

- However, anyone who abuses the procedure (e.g. by maliciously putting an allegation knowing it to be untrue) will subject to disciplinary action.

- **CONCLUSION**

In conclusion organisation reiterates its commitment to providing its employees, a workplace free from harassment /discrimination and where every employee is treated with dignity and respect.

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Mahape, Navi Mumbai, MAHARASHTRA, 400701,
INDIA

Page 17 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

Annexure A

FORMAT FOR REPORTING SEXUAL HARASSMENT AT WORKPLACE COMPLAINTS

To,
Name of the Company
Address:

Sexual Harassment details: [You may attach additional sheets if necessary, to provide the details]

a) Person/people involved in Sexual Harassment at Workplace:

[Please provide the full name(s), designation, location(s), SBU of the Respondent and the relationship with you (e.g. supervisor, colleague, etc.)]

b) Incidents and factual data: [Please describe the incident/s]

Your response to the incident/s

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Mahape, Navi Mumbai, MAHARASHTRA, 400701,
INDIA

Page 18 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

c) Other material and relevant details: [Please provide date/s, place/s of the incident/s, name and addresses of the witnesses, details of text messages, emails, if any, etc.]

Person making the Complaint is [please tick]:

- a) Aggrieved Person.
- b) A relative of the Aggrieved Person.
- c) A friend of the Aggrieved Person.
- d) A co-worker with the Aggrieved Person.
- e) A qualified psychiatrist or psychologist.
- f) The guardian or authority under whose care the Aggrieved Person is receiving treatment or care.
- g) A person who has knowledge of the incident with the written consent of the Aggrieved Person.
- h) A person who has knowledge of the incident with the written consent of the legal heir of the Aggrieved Person.
- i) A person who has knowledge of the incident jointly with a relative or a friend of the Aggrieved Person or a special educator or a qualified psychiatrist or psychologist, or the guardian or authority under whose care the Aggrieved Person is receiving treatment or care.
- j) Others (Please Specify)

Prepared By	Human Resource Capital	Approved By	Managing Director
Signature	Ms. Archana Panoram	Signature	Mr. Kaushal Mehta

Walplast Products Private Limited & Group of Companies

Foundation of Trust



**WALPLAST PRODUCTS PVT. LTD &
GROUP OF COMPANIES**
A 246, T.T.C. Industrial Area, M.I.D.C. Area,
Mahape, Navi Mumbai, MAHARASHTRA, 400701,
INDIA

Page 19 of 20

Doc. No. WPPL

Issue No: 01

Issue Date - 08.03.2019

Title- POSH Policy Guide for Employees

Rev No: 02

Rev Date - 18.05.2023

Sr. No.	Particulars	
1.	Name of the person(s) reporting	
2.	Designation	
3.	Department	
4.	Location	
5.	Office No	
6.	Official email Id	
7.	Complete office address with Pin Code	
8.	Mobile No	
9.	Personal email Id	
10.	Complete residence address with Pin Code	
11.	Residence Phone No	
12.	Date	
13.	Place	
14.	Signature	

Prepared By	Human Resource Capital	Approved By	Managing Director
Signature	Ms. Archana Pancham	Signature	Mr. Kaushal Mehta

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Page 20 of 20

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Annexure B

Internal Complaints Committee

Presiding officer - Ms. Fozia Qureshi
Member - Ms. Vanita Chandore
Member - Mr. Rohit Chakraborty
Member - Mr. Pratik Mehta
External Member – Ms. Pratishtha Ashok Erande

Prepared By	Human Resource Capital	Approved By	Managing Director
Signature	Ms. Archana Pancham	Signature	Mr. Kaushal Mehta

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