

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE (POSH)

Modi Properties Private Limited

1. PREAMBLE

Modi Properties Private Limited (“MPPL” or “the Company”) is committed to providing a safe, dignified, inclusive, and respectful working environment free from sexual harassment. Sexual harassment violates the fundamental rights of women to equality, life, and liberty as guaranteed under the Constitution of India.

This Policy is framed in accordance with the **Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013** and the rules made thereunder.

2. OBJECTIVE

The objectives of this Policy are to:

- Prevent and prohibit sexual harassment of women at the workplace
- Provide a fair, confidential, and effective redressal mechanism
- Promote a culture of respect, dignity, and equality
- Comply with all statutory obligations under the POSH Act, 2013

3. APPLICABILITY

This Policy applies to:

- All women employees (permanent, temporary, contractual, consultants, trainees, interns)
- Vendors, suppliers, service providers, clients
- Visitors, students, community workers
- Any woman present at the workplace, irrespective of employment status

The Policy applies **irrespective of hierarchy, designation, or nature of engagement.**



Registered Office: 5-4-187/3&4, Soham Mansion, 2nd Floor, M.G. Road, Secunderabad, TG 500003

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4. SCOPE – WORKPLACE

As per Section 2(o) of the Act, “Workplace” includes:

- Office premises, sites, project locations
- Any place visited during the course of employment
- Transportation provided by the Company
- Guest houses, hotels, or accommodations provided during official duty
- Virtual or digital workplaces (emails, messages, video calls, etc.)

5. DEFINITIONS

5.1. Aggrieved Woman

A woman who alleges to have been subjected to sexual harassment at the workplace.

5.2. Respondent

A person against whom a complaint of sexual harassment is made.

5.3. Employee

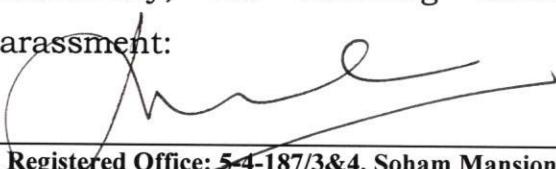
A person employed by MPPL on permanent, temporary, ad-hoc, contractual, or consultancy basis.

5.4. Sexual Harassment

Sexual harassment includes **any one or more of the following unwelcome acts or behaviour**, whether directly or indirectly:

- Physical contact and advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

Additionally, the following circumstances may amount to sexual harassment:



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- Implied or explicit promise of preferential treatment
- Implied or explicit threat of detrimental treatment
- Interference with work or creation of hostile work environment
- Humiliating treatment affecting health or safety

6. INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company has constituted an **Internal Complaints Committee (ICC)** as per Section 4 of the Act.

S. No.	Name & Contact	Designation	Role
1	Mrs. K. Aruna – 9666443289	Senior Woman Employee	Presiding Officer
2	Ms. G Sangeetha – 9502222699	Employee	Member
3	Ms. B Akhansha – 7569317533	Employee	Member
4	Mr. MA Lateef – 9985338487	Advocate	External Member

Mrs. K. Aruna has over 20 years of association with MPPL and is designated as Presiding Officer.

Mr. MA Lateef is an Advocate familiar with issues relating to sexual harassment.

Tenure

The ICC shall hold office for a period of **three (3) years**.

7. REDRESSAL MECHANISM – COMPLAINT PROCESS

7.1. Filing of Complaint

- An aggrieved woman may file a **written complaint within 3 months** from the date of incident
- For a series of incidents, within **3 months from the last incident**



- The ICC may extend the time limit by **another 3 months** for sufficient cause

If the aggrieved woman is unable to make a written complaint, the ICC shall provide reasonable assistance.

If the woman is unable to complain due to physical or mental incapacity, a legal heir or authorized person may file the complaint on her behalf.

8. CONCILIATION

- Before initiating inquiry, the ICC may attempt conciliation **at the request of the aggrieved woman**
- **Monetary settlement shall not be the basis of conciliation**
- Settlement shall be recorded and copies provided to both parties
- If settlement terms are violated, ICC shall proceed with inquiry

9. INQUIRY PROCEDURE

- ICC shall conduct inquiry in accordance with principles of natural justice
- Both parties shall be given opportunity to be heard
- Inquiry shall be completed **within 90 days**
- During pendency of inquiry, ICC may recommend:
 - Transfer of aggrieved woman or respondent
 - Grant of leave up to **3 months** (over and above regular leave)

10. INQUIRY REPORT & ACTION

- ICC shall submit its report to the **Employer** within **10 days** of completion
- Copies shall be provided to both parties
- Employer shall act on the recommendations **within 60 days**



10.1 If Allegation is Proved

Actions may include:

- Written apology or warning
- Withholding promotion or increment
- Reduction in rank
- Termination of employment
- Deduction of salary as compensation to aggrieved woman

10.2 If Complaint is False or Malicious

If complaint is found malicious or based on forged evidence, action may be taken as per service rules.

Inability to substantiate a complaint does not attract action.

11. CONFIDENTIALITY

All proceedings, identities, documents, and information shall be kept strictly confidential as per Section 16 of the Act.

12. RIGHT TO APPEAL

Any person aggrieved by the recommendations may file an **appeal within 90 days** to the appropriate authority/court as per service rules.

13. MANAGEMENT SUPPORT

The Company shall:

- Provide a safe working environment
- Assist in filing complaints under IPC, if required
- Treat sexual harassment as misconduct
- Ensure no retaliation against aggrieved woman

14. ROLES & RESPONSIBILITIES

Employees

- Comply with POSH Policy

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- Attend awareness programs
- Report incidents promptly

Management & HR

- Organise POSH awareness annually
- Display policy & ICC details prominently
- Maintain records and annual reporting

15. ANNUAL REPORTING

The ICC shall prepare an **Annual POSH Report** as per Section 21 of the Act for submission to the Employer and District Officer.

16. PENALTY FOR NON-COMPLIANCE

Failure to comply with the Act may attract:

- Fine up to ₹50,000
- Cancellation of license or registration for repeated violations

