



# **POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE**



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## **I. Purpose**

Veedol is committed to provide our employees a safe, healthy and harassment-free workplace. In an effort to continue to maintain a harassment-free workplace, we have drafted this policy in agreement with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The purpose of this policy is to protect all Individuals from sexual harassment at this workplace and provide a redressal mechanism for complaints of sexual harassment and matters related to it.

## **II. Scope**

Our organization's Prevention of Sexual Harassment Policy extends to

1. All the sites and branches operating in India
2. All individuals who are
  - a. Employees
  - b. Workers
  - c. Consultants
  - d. Trainees (on probation, permanent or contractual basis)
  - e. Customers
  - f. Clients
  - g. Suppliers or
  - h. Anyone who has a business relationship with Veedol
3. All Sexes/genders, i.e., male, female and transgender
4. All interactions arising as a result of employment with Veedol whether the incident has occurred during or beyond office hours.

## **III. Definitions**

1. POSH Act: The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
2. Organization: Veedol



3. Aggrieved : Any person mentioned in II (2) who is subjected to Sexual Harassment at workplace
4. Complainant: A person who files a complaint of sexual harassment suffered or caused to them or any other person with the permission of the complainant or their legal heir
5. Respondent: Against whom the complaint is given
6. Employer: The person(s) responsible for the management, supervision and control of the workplace and discharging contractual obligations with respect to their employees.
7. Workplace: Workplace includes any place visited by the employee arising out of or during the course of employment which are:
  - All office premises
  - All locations where work related activities take place, like client and supplier locations, conferences, seminars, training and meetings
  - Transportation provided by the employer, like office cab or bus
  - Communication medium provided by the employer, like office email, chat tools or phone
  - Office sponsored entertainment, like team dinner, outing or annual party
  - Office provided accommodation or stay, like hostels, guest houses or hotel rooms.

When an employee is working remotely or from home, those spaces are also considered workplace. Social events which are not organized by the organization are excluded from the purview of this Policy.

In case, an employee is subject to sexual harassment from a co-worker at such a social event, then required action under this Policy will be taken against such concerned individuals if:

- a. The incident can affect the reputation of the organization.
  - b. The incident can create a hostile, toxic or intimidating environment at the workplace.
  - c. The incident can have an adverse effect on a person's ability to discharge their duties related to employment.
8. Sexual harassment: Any unsolicited and unwelcome (direct or implied) physical, verbal or non-verbal act of sexual nature that include but are not limited to:
    - Derogatory comments on a person's look, body or clothing
    - Repeated flirting or asking out on date despite being turned down
    - Discussing about one's private life or asking questions about other's private life



- Sharing or showing offensive images, videos or text messages
- Uncomfortable or unwelcome physical contact or advances
- Stalking
- Spreading rumors of sexual nature about other employees
- Physically blocking a person's movement
- Staring at a person making the person uncomfortable
- Making sexually offensive gestures, remarks or facial expressions
- Any (one or more) of the following circumstances, if it occurs or is present in relation or connected with any behaviour that has explicit or implicit sexual undertones-
  - implied or explicit promise of preferential treatment as quid pro quo for sexual favours
  - implied or explicit threat of detrimental treatment in the conduct of work
  - implied or explicit threat about the present or future status of the person concerned.
  - creating an intimidating offensive or hostile learning environment
  - humiliating treatment likely to affect the health, safety dignity or physical integrity of the person concerned.

## IV. Internal Committee

1. This organization has formulated an Internal Committee (hereafter referred to as IC) in writing to stay compliant to the POSH Act. The IC will receive and redress complaints of sexual harassment.
2. The IC consists of :
  - Presiding Officer who is a woman employed at senior level.
  - 3 Internal Members who are employees
  - An External Member from an NGO/Association preferably committed to the cause of women or who have had experience in social work or legal knowledge



3. At least 50% of the members of the IC will be women. The Composition and role of IC is explained in Annexure I.
4. A quorum of minimum three members will be present for the proceedings to take place.
5. The IC members will be replaced every three years as per the POSH Act.
6. This organization has an Internal Committee representing the whole country.

## **V. Lodging a Complaint**

1. Any aggrieved who is subject to sexual harassment at workplace should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. If the aggrieved cannot directly approach alleged harasser(s), they can file a complaint with one of the IC members in writing.
2. Deadline to file a complaint: The complaint needs to be filed within 3 months from the date of the incident. In case there is a series of incidents, complaint should be filed within 3 months from the date of the last incident.
3. This timeline can be extended at the discretion of the IC.
4. Anonymous complaints will not be accepted.
5. Provided that where such complaint cannot be made in writing, the Presiding Officer or any Member of the IC, will render all reasonable assistance to the aggrieved for making the complaint in writing.
6. Inability of the aggrieved to file a complaint:
  - Provided that the aggrieved is unable to file the complaint due to physical incapacity, complaint can be filed by
    - a. A friend or a relative
    - b. A co-worker
    - c. An officer of NCW or State Women Commissions or
    - d. Any person who has knowledge of the incident with the written consent of the aggrieved
  - Provided that the aggrieved is unable to file the complaint due to mental incapacity,



complaint can be filed by

- a. A friend or a relative
  - b. A special educator
  - c. A qualified psychiatrist or psychologist
  - d. The guardian or the authority under whom the aggrieved is receiving treatment or care or
  - e. Any person who has knowledge of the incident jointly with her relative, friend, a special educator, qualified psychiatrist or psychologist, or guardian or authority under whose care she is receiving treatment or care.
- o Provided that the aggrieved is unable to file the complaint for any other reason, a complaint may be filed by any person who has knowledge of the incident, with the written consent of the aggrieved.
  - o Provided that the aggrieved is dead, a complaint can be filed by any person who has knowledge of the incident with the written consent of aggrieved person's legal heir.
7. Upon receipt of the complaint, the IC will forward a copy of the complaint to the respondent within 7 days from the date of receipt of the complaint.
  8. Upon receipt of the copy of the complaint, the respondent must file their reply to the Internal Committee with the names and contact details of the witnesses and documents that can serve as evidence within ten working days.

## **VI. Conciliation**

1. Upon the receipt of the complaint, at the request of the aggrieved, the IC will take steps to resolve the matter through conciliation.
2. Resolution through conciliation will happen within 30 days from the receipt of the complaint.
3. The proceedings will be recorded in writing. No settlement for monetary compensation will be executed. A copy of such settlement will be provided to the employer, the complainant and the respondent.



4. If a settlement is arrived, no further inquiry will be conducted by Internal Committee.

## **VII. Inquiry**

1. In case no settlement is arrived at, or the settlement arrived at in conciliation is not complied with, then the matter will be inquired by the IC. The same will be communicated to the complainant and the respondent.
2. If the complainant and/or the respondent desires to present witnesses and evidence, they should communicate this in writing to the IC.
3. If the Complainant and/or the Respondent desires to produce any documents as evidence they should provide original copies of the same. Evidence in digital/electronic form will be forwarded to the IC in such manner ensuring that the same is not tampered.
4. In case there is a high likelihood for any of the Internal Committee members to be biased in the inquiry or exhibiting conflicting interests with respect to the complaint, they must recuse themselves from the inquiry. Final decision on any perceived or apparent conflict of interest of an IC Member brought forward by the complainant, respondent, witnesses or other IC members will be taken by the Presiding Officer. In case of any perceived or apparent conflict of interests in any IC Member, the team of Internal Committee members that will hear a specific case will be structured by the Presiding Officer.
5. The Internal Committee will conduct the inquiry following the principles of natural justice. Both the complainant and respondent will be given adequate opportunity to explain their sides in the case and cross-examine the other party and their witnesses.
6. The IC will complete the Inquiry, in-person or virtually, within three months from the receipt of the complaint.
7. All the findings of the IC will be shared with the complainant and respondent before the Inquiry Report is prepared. If the complainant and the respondent have any objections with the inquiry report, they can inform the same to the Internal Committee.
8. The IC will prepare and submit the inquiry report along with its findings and recommendations



to the employer within 10 days from the completion of the inquiry. A copy of the inquiry report is shared with the complainant and respondent.

9. Employer will implement the recommended actions within 60 days from the receipt of the inquiry report.
10. In case the complainant communicates her desire to file a complaint with the police before, during or after the inquiry, the IC will support her to do so.

## **VIII. Interim Measures**

1. During pendency of inquiry, based on the requests made by the complainant, the IC may allow interim relief which could include:
  - Preventing the respondent from assessing the complainant's work performance
  - Permitting paid leave to the complainant for a maximum of 3 months, in addition to the leave that the employee is entitled to.
  - Transfer the complainant/respondent to a different location.
  - Other relief as may be appropriate.

## **IX. Unsubstantiated Complaint**

1. The complaint is unsubstantiated if the IC arrives at the conclusion that the allegation against the respondent has not been proven, and that no action is required to be taken in this matter.

## **X. Substantiated Complaint**

1. The complaint is substantiated if the IC arrives at the conclusion that the allegation against the respondent has been proven. It recommends necessary action which may include:
  - Suspension
  - Termination



- Written warning
- Withholding promotion and/or increments
- Apology to be tendered by respondent
- Censure or reprimand
- Counselling
- Or any other action that the IC may see fit.

## **XI. False Complaint**

1. If the IC arrives at the conclusion that the complainant or any other person has made allegation that are malicious or has produced forged or misleading documents/evidence, it may recommend to the employer to take action against the person for making false allegation.
2. A mere inability to substantiate a complaint or provide adequate proof need not attract action against the complainant.

## **XII. Retaliation**

1. Organization prohibits any form of retaliatory or discriminatory behaviors against the complainant or the witnesses.
2. If the IC notices that any person indulges in retaliation or discrimination against the complainant or the witness, it will recommend the employer to take strict action against the guilty.
3. Any individual who experiences retaliation or discrimination for reporting or testifying a sexual harassment complaint should bring it to the notice of the IC.

## **XIII. Confidentiality and Privacy**

1. The IC will maintain a register to endorse the complaint received by it and keep the contents



confidential. The information related to the complaint will be shared only on a need-to-know basis.

2. Organization will strive to maintain confidentiality with respect to any information related to the aggrieved, respondent, witnesses.
3. Anyone who violates the confidentiality clauses will be subject to action as per the POSH Act.

## **XIV. Appeal**

1. Any person aggrieved with the findings and/or recommendations of the IC as mentioned above, and/or the non-implementation of such recommendations, may prefer an Appeal to the Court or Tribunal in accordance with the applicable provisions of the POSH Act.

## **XV. Responsibility of the Employees**

1. All employees must ensure that their conduct is in accordance with this policy.
2. All employees should read the policy. In case of any questions regarding the policy or the POSH act, employee should seek clarification from any of the IC members.

## **XVI. Applicable Law**

1. [The Sexual Harassment of Women At Workplace \(Prevention, Prohibition And Redressal\) Act, 2013](#)



**Annexure I**

**Internal Committee contact details for your region can be obtained from your Human Resource personnel.**



## **Annexure II**

Information to be included in Sexual Harassment Complaint

### **Date of complaint submission**

### **Details of the aggrieved**

- Name of the aggrieved
- Designation (if an employee)
- Unit/Division/Department (if an employee)
- Phone Number
- E-mail address

### **Details of the complainant (if the complainant is filing the complaint on behalf of the aggrieved)**

- Name of the complainant
- Designation (if an employee)
- Relationship of the complainant with the aggrieved (friend, co-worker, etc.)
- Unit/Division/Department (if an employee)
- Contact number
- E-mail address
- Reason for the inability of aggrieved to file complaint

### **Details of the Respondent**

- Name of the respondent
- Designation
- Unit/Division/Department (if an employee)
- Relationship of the respondent with the aggrieved (supervisor, co-worker, vendor, client, etc.)
- Contact number



- E-mail address

**Details of the Incident**

- Date of the incident(s)
- Description of the incident
- In case of a series of incidents, list all the incidents along with the date of each
- Witnesses and their contact details
- Documents that serve as evidence
- Name and contact details of any person(s) contacted by the aggrieved after the incident (If any)



## VEEDOL CORPORATION LIMITED

[formerly Tide Water Oil Co. (India) Limited]

CIN: L23209WB1921PLC004357

An ISO 9001:2015 Company

## VEEDOL CORPORATION LIMITED

Ref: VCL/POSH/CIR/2

Date : 23/12/2024

### CIRCULAR

### Sub : Prevention of Sexual Harassment (POSH) of Women at Workplace – formation of Internal Complaints Committee

In line with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 with a view to provide protection against sexual harassment of women at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected herewith or incidental thereto, the Internal Complaints Committee for respective regions are revised hereunder :

#### Eastern Region

- |                                   |                     |
|-----------------------------------|---------------------|
| 1. Ms. Shyamashree Mukherjee Bhar | - Presiding Officer |
| 2. Mr. Satya Ranjan Mahapatra     | - Member            |
| 3. Mrs. Debdutta Basu             | - Member            |
| 4. Mr. Shyam Sundar Das Biswas    | - Member            |
| 5. Ms. Saumin Ali                 | - External Member   |

#### Northern Region

- |                           |                     |
|---------------------------|---------------------|
| 1. Ms. Pooja Singh        | - Presiding Officer |
| 2. Mr. Ruchitam Pandey    | - Member            |
| 3. Mr. Rakesh Kumar Sinha | - Member            |
| 4. Ms. Ishita Sharma      | - Member            |
| 5. Ms. Saumin Ali         | - External Member   |

#### Western Region

- |                         |                     |
|-------------------------|---------------------|
| 1. Ms. Babita Dhar      | - Presiding Officer |
| 2. Ms. Vishmita Poojary | - Member            |
| 3. Ms. Joyner Lazarus   | - Member            |
| 4. Mr. Chetan Shriram   | - Member            |
| 5. Ms. Saumin Ali       | - External Member   |



## VEEDOL CORPORATION LIMITED

[formerly Tide Water Oil Co. (India) Limited]

CIN: L23209WB1921PLC004357

An ISO 9001:2015 Company

### Southern Region

- |                          |                     |
|--------------------------|---------------------|
| 1. Ms. Kaviya Meialaghan | - Presiding Officer |
| 2. Mr. S. Srinivasan     | - Member            |
| 3. Mr. S. Karthikeyan    | - Member            |
| 4. Ms R. Amrithavalli    | - Member            |
| 5. Ms. Saumin Ali        | - External Member   |

The Complaints Committee shall be responsible for the redressal of complaint/s made by complainant/s under guidance from the External Member as part of the Act. The Committee will also be responsible for creating awareness amongst employees on the subject, as and when required.

(Arijit Basu)

Managing Director