ECOS (I) Mobility and Hospitality Ltd

Policy on Prevention of Sexual Harassment of Employees at Workplace

ECOS (I) Mobility & Hospitality Ltd.

Version 2.6 - 2026

DOCUMENT CHANGE CONTROL		
Document Name:	**POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES AT WORKPLACE**	
Current Version	2.6	
Document Type	Policy on Prevention of Sexual Harassment of Employees at Workplace – POLICY	
Document Creator & Date	Human Resource Department	May 2013
Coverage	All employees of ECOS and it's group companies Business partners, Visitors, deputation, contract, temporary, part time or working as consultants	
Policy version effective from	6th June 2026	
Approved By:	Chief Operating Officer	
Current Version Signed Off By:	Chief Operating Officer & Head Human Resources	

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POLICY ON PREVENTION OF SEXUAL HARASSMENT OF EMPLOYEES AT WORKPLACE

ECOS (I) MOBILITY & HOSPITALITY LTD.

1.0. PREAMBLE

1.1. ECOS (I) Mobility & Hospitality is strongly committed to create a workplace that ensures Equal Employment Opportunity and a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The company also believes that all its employees of the Group Companies have the right to be treated with dignity. Sexual harassment at the workplace or in the course of official duties, if involving employees of the company shall be considered as a grave offense and is therefore punishable under the applicable Laws.

1.2. The Supreme Court of India in its landmark judgement of 1997 in '**Vishaka and others vs. State of Rajasthan**', laid down guidelines making it obligatory for every employer and other responsible persons to provide a mechanism to redress grievances pertaining to workplace sexual harassment and evolve a specific policy to combat sexual harassment in the workplace and enforce the right to gender equality of working women. Sexual Harassment is a violation of right of womanto gender Equality under Articles 14 and 15, Right to Life and Dignity under Article 21 and Right to Work (Liberty) under Article 19(1)(g) of the Constitution of India.

1.3. The Government of India has made effective on April 23, 2013 a law called '**The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013** on prevention of sexual harassment against female employees at the workplace Commission of any act of sexual harassment as defined in the Act and in this Policy shall result in strict disciplinary action.

1.4. Every woman shall have a right to be free from sexual harassment and the right to work in an environment that is free from any form of sexual harassment. The right of women to protection from sexual harassment and the right to work with dignity are recognized as universal human rights by international conventions such as '**Convention on the Elimination of all Forms of Discrimination against Women' (CEDAW)**, which has been ratified by Government of India.

1.5. This Policy has also been formulated to create and maintain a safe working environment where all employees treat each other with courtesy, dignity and respect irrespective of their gender, race, caste, creed, religion, place of origin, sexual orientation, disability, economic status or position in the hierarchy. Employees in the Company are entitled to work in an environment free from any form of discrimination or conduct which can be considered harassing, coercive, or disruptive.

1.6. This Policy seeks to assist employees who believe they have been subjected to such behaviour with appropriate support and remedial action.

1.7. This Policy is prepared under the overall ambit of the ECOS Code of Conduct and Business Ethics and as per the statutory requirement.

2.0. OBJECTIVE

2.1. To fulfill the directive of the Supreme Court of India, in 2013, the Government of India notified the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013, enjoining all employers to develop and implement a Policy against sexual harassment of women at the work place or in the course of official duties. The policy will remain applicable wherever employees have occasion to interact with each other including for example, in vehicles, third party premises, off site meetings and public venues.

2.2. To uphold Women's' Right to Protection against Sexual Harassment and the Right to Livelihood and towards that end for the prevention and redressal of Sexual Harassment of Women.

2.3. To evolve an effective mechanism for the prevention, prohibition and redress of sexual harassment of women at the workplace or in the course of official duties with the Company.

2.4. To promote an environment that will raise awareness about and deter acts of sexual harassment of employees of the Company.

2.5. To ensure implementation of the Policy in letter and spirit by taking all necessary and reasonable steps including but not limited to constitution of appropriate Committees for purposes of gender sensitization and to conduct enquires into complaints of sexual harassment.

2.6. To uphold the commitment of the Company to provide an environment that is free from discrimination and violence against women.

2.7. To generate general awareness against sexual harassment of women at the workplace.

3.0 APPLICABILITY

3.1. This Policy shall be applicable to all group companies (along with their successors and assignees) and will be generically referred to as the Company in this document

3.2. This Policy shall also be applicable to all the new group companies, subsidiaries and affiliates to be incorporated in future.

4.0 SCOPE:

4.1. This Policy extends to all employees of the Company and is deemed to be incorporated in the service conditions of all employees and comes into effect immediately. These Rules and Procedures shall be applicable to all the complaints of sexual harassment made by an employee in relation to the workplace of the Company against respondent(s) in relation to the workplace of the Company, provided the sexual harassment has happened at the workplace or in the course of official duties or in relation to the workplace of the Company.

4.2. "**Sexual harassment**" includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

i. Physical contact and advances; or

ii. A demand or request for sexual favors; or

iii. Making sexually colored remarks; or

iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or

v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

i. implied or explicit promise of preferential treatment in their employment

ii. implied or explicit threat of detrimental treatment in their employment

iii. implied or explicit threat about their present or future employment status

iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.

v. humiliating treatment likely to affect the health and safety of the aggrieved person.

In addition to the instances mentioned hereinabove, any other acts or behavior, sexual in nature, which outrages the modesty of the aggrieved employee, will be considered as sexual harassment.

4.3. When a person uses with a sexual purpose, the body or any part of it or any object as an extension of the body in relation to a employee without her consent or against her will, such conduct will amount to sexual assault.

4.4. It is clarified that it is the reasonable perception of the employee that would be relevant in determining whether any conduct was sexually determined and, if so, whether such conduct was unwelcomed ~~or not~~ and that her objection would disadvantage her in connection with her education or employment, including evaluation, grading, recruitment or promotion, or when it creates a hostile working environment.

4.6. It is further clarified that “Hostile Environment” is said to be created when any act of Sexual Harassment has the purpose or effect of interfering with an individual’s work performance or creating an intimidating, hostile or offensive employment / environment.

4.7. Every employee is free to directly approach the person alleged to harass that employee and request that the harassing behaviour is immediately stopped, before approaching the Internal Complaints Committee formally with the Complaint of Sexual Harassment.

4.8. “Employee” means any person on the rolls of the Company including those on full time

employment, business partners, deputation, contract, temporary, part time, training or working as consultants.

4.9 Aggrieved employee means – in relation to the workplace of the Company, a employee, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by the respondent.

4.10 “Respondent” means a person against whom the aggrieved employee has made a complaint under section 7 of this policy

4.11 “Workplace” means shall include any place visited by the employee arising out of or during the course of employment, including transportation provided by the Company for undertaking such a journey. It encompasses all physical offices, branches, vehicles, third-party premises, and off-site venues (such as training programs, seminars, and social events). Furthermore, it explicitly includes virtual and digital environments where work-related interactions occur, such as video conferencing, official emails, and instant messaging platforms

5. PROFESSIONAL CONDUCT STANDARDS

5.1 CONSENSUAL SEXUAL RELATIONSHIPS

The Company discourages romantic or sexual relationships between a member of Management or other supervisory employee and his or her staff (an employee who reports directly or indirectly to that person); as such relationships could lead to conflicts of interest at work. It is therefore in the best interest of all concerned, that if there is such a relationship, the involved parties notify Management of the Company so that the reporting chain can be altered to ensure that no direct or indirect reporting relationship continues.

5.2 GOSSIP AS A FORM OF SEXUAL HARASSMENT

This policy defines sexual harassment to include "making sexually colored remarks" and any other unwelcome verbal conduct of a sexual nature. If gossip involves discussing an employee's personal life, sexual history, or making derogatory comments about their body or character, it can be classified as sexual harassment under the pretext of creating a hostile work environment. One of the most severe forms of gossip under the POSH Act relates to ongoing investigations. The law requires that the identities of the complainant, respondent, and witnesses, as well as the details of the inquiry, must be kept strictly confidential. Spreading information about a POSH case to the press, media, or other unauthorized persons is a violation of the recommended process. Hence, spreading rumors or "gossip" about a colleague—especially regarding their character, personal life, or any ongoing POSH inquiry—is not just unprofessional; it can be legally classified as misconduct or sexual harassment, leading to disciplinary actions such as warnings, transfers, or termination

6. INTERNAL COMMITTEE / COMPLAINT REDRESSAL COMMITTEE:

6.1. An Internal Committee (IC) / Complaint Redressal Committee (hereinafter as “**Committee**”) have been constituted by the Management of the Company to consider and redress complaints of Sexual Harassment.

The Members of the Committee are as follows:

i) **Ms. Deepali Dev**	- Presiding Officer (since September 2023)
ii) **Ms. Shweta Bhardwaj**	- Member (since September 2023)
iii) **Mr. Rajnish Sharma**	- Member (since May 2026)
iv) **Mr. Shivcharan Yadav**	- Member (since December 2023)
v) **Ms. Lekhashri Baskar**	– Member (since May 2026)
vi) **Ms. Prakrati Mathur**	**-** NGO member (External)

6.2. The Committee Members will be nominated by management as per the below norms:

i) The Presiding Officer of the Committee shall be a woman employed at Senior Level
ii) Not less than half of the number of members of the Committee shall be Women.
iii) The Presiding Officer and every Member of the Internal Committee shall hold office for such period, not exceeding three years, from the date of their nomination and the new member shall be nominated and announced to all employees in the event of the same.

6.3. A quorum of 3 members is required to be present for the proceedings to take place. The quorum shall include the Presiding Officer, at least two members, out of which one Member shall be a woman.

6.4. If in the Committee the member representing the category of the defendant is junior in the hierarchy of the Company to the defendant, then, for that particular enquiry that member shall be substituted on the Committee by another person, senior in rank to the defendant.

6.5. No person who is a complainant, witness or defendant in the complaint of sexual harassment shall be a member of a Committee.

6.6. Any Committee member charged with sexual harassment in a written complaint/ found guilty in any other disciplinary proceedings/ any other disciplinary proceeding is pending against him/her, must step down as a member during the enquiry into that complaint.

6.7. The Committee shall also have one person who is a nominee from a Non-Governmental Organization or any such person who is familiar with the subject of Sexual Harassment, as a third-party Member.

6.8. Changes in the Members of the Committee, whenever necessary, shall be made as expeditiously as possible by the Competent Authority.

7.0 REPORTING AND REDRESSAL PROCESS:

7.1. The mechanism for registering complaints should be safe, accessible and sensitive. All complaints must preferably be brought by the complainant in person. All precaution will be taken to protect

the privacy of the individuals involved. **Any aggrieved employee** who is of the view that he/she is being sexually harassed directly or indirectly, may submit a complaint of the alleged incident to any or all the members of the Committee in writing with his/her signature within **three months** from the date of occurrence of incident. It is also encouraged that both parties maintain records of all incidents, (such as, physical copies of emails, details of dates, places, witnesses and their feelings at the time of the alleged harassment. Photographs, video/audio recordings submitted should be tamper proof. These are useful should a formal process come up).

Provided however that where such complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaints Committee, as the case may be, shall render all reasonable assistance to the individual concerned for reducing the complaint in writing.

7.2 A written complaint with the following details must be submitted by the Complainant:

a) State the name of the alleged offender including designation and contact numbers

b) State the date(s) and location(s) of the alleged incident(s) of harassment

c) A detailed description of the incident(s) in question as well as other relevant circumstances; The written complaint/email must provide the details of the incident together with the name/s of, the alleged harasser/s and the victim/s, as available.

d) Names of witnesses and physical and/or documentary proof if any that supports the allegation including other potential complainants, if any

e) Shall be signed and dated; no anonymous complaints shall be accepted by the Committee.

f) Complaint should include with contact details of the complainant / victim such as name, address, contact number, department etc

7.3. The filing of a complaint shall not ordinarily adversely affect the Complainant's status/job/salary/promotion, grades, etc. During the pendency of an enquiry and till the final determination of a complaint of sexual harassment under this Policy, the Company shall not alter the conditions of service of the Complainant/Witness/Supporter concerned to their prejudice, as a consequence to the filing, participation or holding of an enquiry under this Policy.

7.4. The Company encourages prompt reporting of Sexual Harassment incidents so that timely and appropriate action may be taken. Nevertheless, considering the sensitivity of the issue and the emotional aspects that may arise, a delay may be considered favorably by the Committee provided the Complainant submits sufficient cause for such delay. In case the employee has experienced Sexual Harassment during his/her tenure of employment, but has since left the services of ECOS, then, the Committee shall accept a Complaint so long as it is received in writing within three months from the date of cessation of employment.

7.5 If an employee believes that he/she is experiencing retaliation of the nature of intimidation, pressure to withdraw the case or threats for reporting, testifying or otherwise participating in the proceedings before the Committee, then, such employee should immediately report the matter to the Committee. Such incidents shall be treated as seriously as an alleged case of Sexual Harassment and will apply even if the original complaint is not given. Similarly, any undue influence whether direct or indirect, to the proceedings by any party shall be construed as

'Misconduct' and shall attract disciplinary action.

7.6 Where the aggrieved employee is unable to make the complaint on account of her physical or mental incapacity or death or otherwise, her legal heir or such other person as may be prescribed may make a complaint to the Committee

7.7 The Committee shall maintain a register to endorse the complaint received by it and keep the contents strictly confidential, if it is so desired, except to use the same for discreet investigation.

7.8 In the event of information received by the Committee of any such sexual harassment incident in relation to the workplace of the Company the Committee shall discuss the same with the aggrieved employee/employee and if the aggrieved employee is not willing to provide a complaint the same shall be recorded and the case shall not be proceeded further

7.9 The Committee shall hold a meeting with the Complainant within ten working days of the receipt of the complaint, but no later than fifteen working days in any case. In exceptional cases, emergency meeting may be convened by the Presiding Officer as per the requirement.

7.10. At the first meeting, the Committee shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written, etc. to substantiate the complaint. If the Complainant does not wish to depose in person due to embarrassment of narration of events, a lady officer for lady employee(s) and a male officer for male employee(s) desirous of lodging such complaint shall meet and record the statement. At the request of the aggrieved employee, the Committee may take steps to settle the matter through conciliation before initiating a formal inquiry.

7.11 Thereafter, the Committee shall summon the person against whom the Complaint is made for the purposes of a deposition before the Committee and an opportunity shall be given to such person to give an explanation to the allegations, where after, an 'Inquiry' shall be conducted and concluded.

7.12 In case of the complaint being found and determined to be of malafide intent or blatantly false or that the incident was publicized without going through the recommended process, such behavior will be construed as a misconduct and the Complainant shall, if deemed fit be liable for appropriate disciplinary action including but not limited to termination of services by the Management of the Company.

7.13 If the Committee decides not to conduct an enquiry into a complaint, it shall record the reasons for the same in the minutes of the Committee meeting. The Committee shall make the same available to the Complainant in writing.

7.14 During the pendency of an Inquiry, the Committee may recommend for transfer of the aggrieved employee or respondent; or grant leave to the aggrieved employee up to a period not exceeding three months (which shall be in addition to the leave otherwise entitled) or grant such other relief to the aggrieved employee as may be prescribed by the Company from time to time.

7.15. In the event, the complaint does not fall under the purview of Sexual Harassment or the complaint does not mean an offence of Sexual Harassment, the same would be dropped after recording the reasons thereof.

8. INQUIRY PROCESS:

8.1. The Committee shall immediately proceed with the inquiry and communicate the same to the Complainant and respondent. The venue of the Inquiry shall take into consideration the convenience and security of the complainant.

8.2. The identities of the Complainant, respondent and all witnesses shall throughout be protected and kept confidential by the Committee.

8.3. The Committee shall prepare and handover the Statement of Allegation to the respondent and give him/her an opportunity to submit a written explanation if she/he so desires within seven working days of receipt of the same.

8.4. The Complainant shall be provided with a copy of the written explanation submitted by the respondent.

8.5. If the Complainant or the respondent desires any witness (es) to be called, they shall communicate in writing to the Committee, the names of witness (es) that they propose to call. The responsibility of communicating with the witnesses lies with the complainant/defendant regarding the date, time and venue of the meeting.

8.6. If the Complainant desires to tender any documents by way of evidence before the Committee, she/he shall supply original copies of such documents. Similarly, if the person against whom the complaint is made desires to tender any documents in evidence before the Committee, he/she shall supply original / true copies of such documents. Both shall affix his/her signature on the respective documents to certify these to be true copies of the original. The Committee shall have the power to summon any official papers or documents pertaining to the complaint under enquiry.

8.7. The Committee shall call upon all witnesses mentioned by both the complainant and the person against whom the complaint has been lodged. The Committee may at its sole discretion, summon necessary and relevant document / witness, if it is of the opinion that it shall be in the interest of justice.

8.8. The Committee shall provide every reasonable opportunity to the Complainant and the defendant for putting forward and defending their respective case. The Committee shall retain the right to disallow any questions that it has reason to believe to be irrelevant, mischievous, slanderous, derogatory or gender insensitive. Any behavior, verbal or otherwise, on the part of the defendant or his nominee, that is designed to intimidate or subject the complainant or her witness to mental and physical trauma, shall entitle the Committee to recommend disciplinary action against the defendant.

8.9. The Complainant and the defendant shall have the right of cross-examination of all witnesses.

8.10. If the Committee believes that the absence of either of the Complainant or the Defendant and or their witnesses to the dispute is on valid grounds, the Committee shall adjourn that particular meeting of the Committee for a period not exceeding fifteen working days. The meeting so adjourned shall be conducted thereafter, even if the person concerned fails to appear for the said adjourned meeting of the Committee without prior intimation/valid grounds.

8.11. The Committee shall have the right to summon, as many times as required, the defendant, the complainant and/or any witnesses for the purpose of supplementary testimony and/or clarifications.

8.12. The Committee shall have the right to terminate the proceedings and to give an 'ex-parte' decision on the complaint, should the defendant fail, without valid ground, to present himself for three consecutive hearings convened by the Committee.

8.13. **The Committee shall complete the 'Inquiry' within reasonable period but in no case beyond three months from the date of its commencement** and communicate its findings and its recommendations for action to the Competent Authority of the Company. In the event of any delay in submission of the Inquiry Report, the reasons for the same shall be recorded in writing by the Committee. The Report of the Committee shall be treated as an Inquiry Report on the basis of which a delinquent employee shall be awarded appropriate punishment by the Competent Authority of the Company with 60 days. The Competent authority will act on the report of the Committee in accordance with the Company Rules.

8.14. The Committee shall not permit any evidence or examination based on the aggrieved employee's character, personal life, and conduct, personal and sexual history.

8.15. The Committee shall take note of the respective socio-economic positions of the parties, their hierarchy in the organization of the Company / workplace.

8.16. The Committee shall be governed by such rules and guidelines as may be consistent to prevalent law or regulation, as amended or enacted from time to time.

9. FINDINGS AND CONCULSION OF THE INQUIRY

9.1. Where the Committee arrives at a conclusion that the allegation against the defendant has not been proved, it shall recommend to the Competent Authority that no action is required.

9.2. Where an incident of Sexual Harassment has been determined by the Committee, corrective / disciplinary action based on the gravity of the offence may be recommended to the Management of the Company/Competent Authority.

9.3. The range of Corrective measures / disciplinary and such suitable measures and action which the Competent Authority may consider imposing, may include but not limited to:

a) A communication / letter of warning be sent to the employee and a copy of which shall be placed in the personal file of that employee by Human Resources Department.

b) Immediate transfer or any other appropriate disciplinary action.

c) Stoppage of increment with or without cumulative effect.

d) Reduction in rank

e) Termination/dismissal from the services of the Company by the Competent Authority

f) Any other action that the Competent Authority may deem fit and proper; and

g) Filing of a complaint before the relevant statutory / police authorities / court of law

9.4. The Management of the Company shall provide all necessary assistance for the purpose of ensuring full, effective and speedy implementation of this Policy.

9.5. The Committee shall analyze and submit periodical Inquiry reports on all such complaints received by it at the end of each financial year to the Competent Authority of the Company.

9.6. Upon receipt of the Inquiry Report, the Competent Authority shall promptly act on the Inquiry Report. If the Competent Authority disagrees or wishes to modify the recommendations of the Committee against Sexual Harassment, it may do so by recording the reasons in writing.

9.7. A Copy of the Inquiry Report shall be given by the Competent Authority to the Complainant and the Defendant. The Competent Authority shall however take disciplinary action only after giving the defendant an opportunity to reply to the findings of the Committee.

9.8. The Complainant and the Defendant shall have the right to appeal if they are dissatisfied with the decision of the concerned Committee or the Competent Authority before the Appellate Authority within 90 days of the recommendation.

9.9. Where the conduct of sexual harassment amounts to a specific offence under the Indian Penal Code, 1860 or under any other law; it shall be the duty of the Committee to immediately inform the complainant of her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same. Any such action or proceedings initiated shall be in addition to proceedings initiated and / or any action taken under this Policy. Further, nothing in this Policy shall prevent the Complainant or the person against whom the complaint was made, from pursuing formal legal remedies or resolution through competent authorities empowered by law or regulation or courts of law in India.

9.10. The disciplinary action shall be commensurate with the nature and impact of the sexual harassment. Non-adversarial modes of redress and resolution could also be considered in appropriate cases which may include verbal warning, verbal apology, promise of good behavior, counseling, etc.

9.11. A second or repeated offence shall on the recommendation of the Committee attract an enhanced penalty.

9.12. For the purposes of this Policy, the ‘Competent Authority’ shall be the senior-most member of the Management Team or such person as appointed by the Board of Directors of the Company, to act as such from time to time.

9.13. For the purposes of this Policy, the ‘Appellate Authority’ shall be the Chief Operating Officer of the Company.

9.14. During Inquiry Proceedings, the name & contact details of the Appellate Authority shall be communicated to the complainant and the charged employee(s) by the Human Resources Department in written.

9.15. On the basis of the working of this Policy, the Competent Authority of the Company shall have the powers to make recommendations for bringing about changes in this Policy and after adequate consultation with the Management of the Company, suggest changes as and when required in keeping with the Preamble and Objectives of the Policy. Any changes to the Policy shall be suitably communicated to all employees by the Human Resources Department of the Company.

9.16. Where sexual harassment occurs as a result of an act or omission by any third party or outsider, the Company shall take all steps necessary and reasonable to assist the affected person in terms of support and preventive action.

9.17. In case the Committee finds the degree of offence coverable under the Indian Penal Code, then this fact shall be mentioned in its report and appropriate action shall be initiated by the Management, for making a Police Complaint.

9.18. The name of the aggrieved employee and witness shall not be referred to / revealed in any records of proceedings by the Committee / Company to any press / media or any other persons whilst reporting the proceedings / case.

9.19. These guidelines shall not prejudice any other rights available under the Protection of Human Rights Act, 1993.

10. DUTIES AND POWERS OF THE PRESIDING OFFICER AND THE COMMITTEE:

10.1 The Presiding Officer will:

(i). To ensure an orderly presentation of all evidence

(ii). To ensure that the proceedings are accurately recorded; and

(iii). To see that a fair and impartial decision based on the issues and evidence presented at the hearing is issued by the Committee.

10.2. The Complaint Redressal Committee will:

(i). Define issues of contention

(ii). Conduct a fair and impartial hearing which ensures the rights of all parties involved

(iii). Receive and consider all relevant evidence which reasonable people customarily rely upon in the conduct of serious business

(iv). To ensure that the Complainant and Respondent have full opportunity to present their positions and to present witnesses and evidence which support their positions; further, the committee may also name individuals to appear as witnesses

(v). Ask relevant questions to the Complainant, Respondent, and witnesses to elicit information which may assist the Committee in making a decision; employees of the organisation have a responsibility to fully cooperate with this process

(vi). Continue the hearing to a subsequent date if necessary, to permit either party or the Panel to produce additional evidence, witnesses, or other relevant materials

(vi). Change the date, time or place of the hearing on its own motion or for good reason shown by either party, and with due notice to all parties

(vii). Permit both parties to submit written arguments following the conclusion of the hearing

(viii). Rule by majority vote on all questions of fact, interpretations of rules, regulations and policies, recommendations for penalties and relief, and any requests that are made during the hearing.

The Hearing Panel may consult with or have the assistance of Legal Counsel throughout this process.

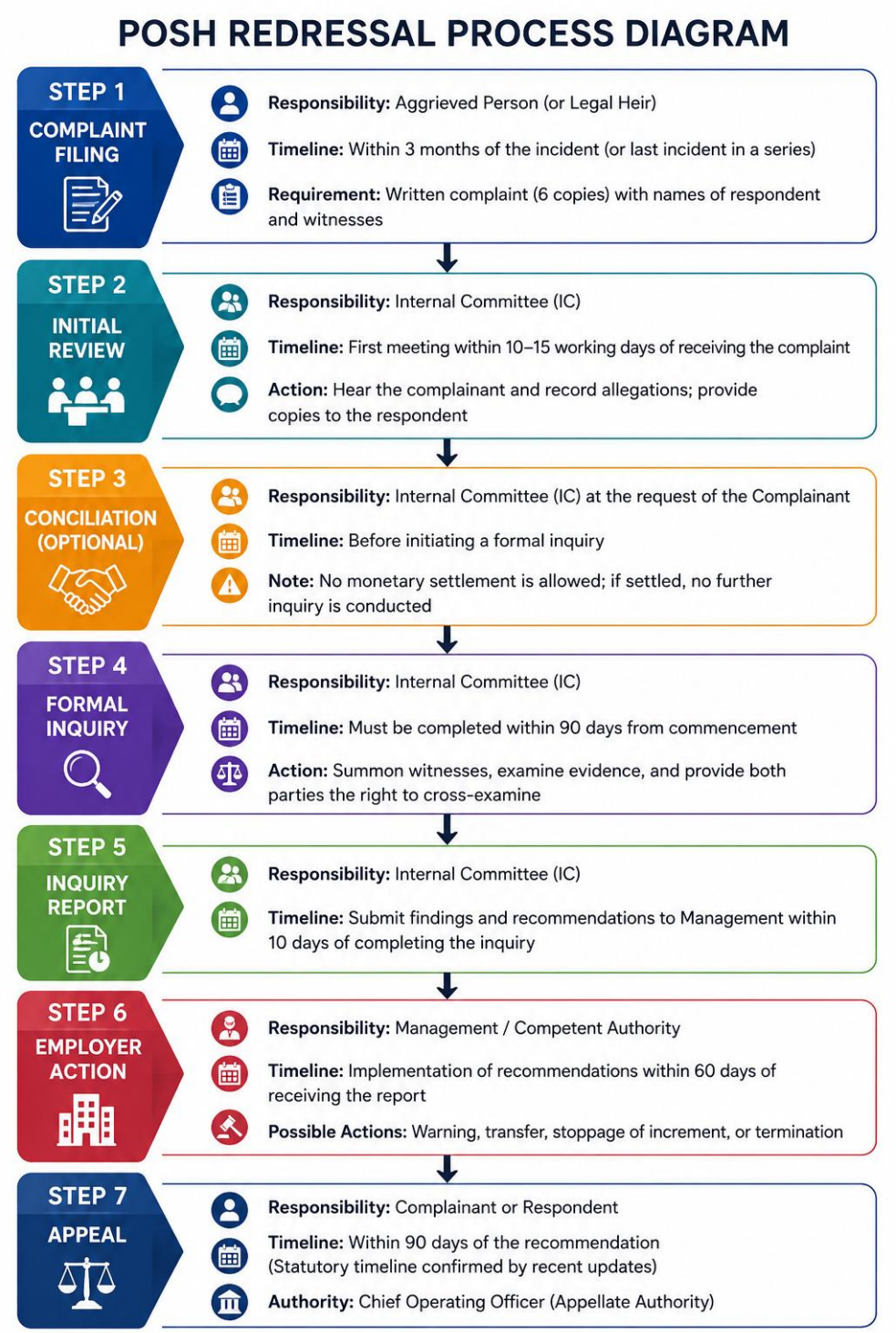
11. ADMINISTRATION & TRAINING:

11.1. The Company adopts various Communication & training initiatives on periodic basis to create awareness & educate on the policy. Employees are required to acknowledge that they have read and understood the policy and are required to take part in the annual training programs conducted by the L&D Team for employees and IC members. Employees must remember that under no circumstances does failure to read the policy, sign an acknowledgement or certify online exempt from obligation to comply with the policy.

11.2 Violating the policy will attract strict disciplinary action. Where appropriate, the Company takes prompt corrective action, up to and including termination of employment. We strive for consistency and fairness in discipline for policy violations. Discipline may include a verbal or written warning; suspension with or without pay; loss or reduction of bonus; or, for the most serious offenses or repeated misconduct, termination of employment. Any disciplinary action depends on the nature, severity, and frequency of the violation. It may vary depending upon local law/laws of the land

11.3 The HR department in discussion with the IC must prepare an Annual Report with specific details (number of cases filed, disposed of, pending, and awareness programs conducted) to be submitted to both the Employer and the District Officer as per Section 21 of the POSH Act.

ANNEXURE -1:


POSH REDRESSAL PROCESS DIAGRAM
STEP 1
COMPLAINT FILING
Responsibility: Aggrieved Person (or Legal Heir)
Timeline: Within 3 months of the incident (or last incident in a series)
Requirement: Written complaint (6 copies) with names of respondent and witnesses
STEP 2
INITIAL REVIEW
Responsibility: Internal Committee (IC)
Timeline: First meeting within 10–15 working days of receiving the complaint
Action: Hear the complainant and record allegations; provide copies to the respondent
STEP 3
CONCILIATION (OPTIONAL)
Responsibility: Internal Committee (IC) at the request of the Complainant
Timeline: Before initiating a formal inquiry
Note: No monetary settlement is allowed; if settled, no further inquiry is conducted
STEP 4
FORMAL INQUIRY
Responsibility: Internal Committee (IC)
Timeline: Must be completed within 90 days from commencement
Action: Summon witnesses, examine evidence, and provide both parties the right to cross-examine
STEP 5
INQUIRY REPORT
Responsibility: Internal Committee (IC)
Timeline: Submit findings and recommendations to Management within 10 days of completing the inquiry
STEP 6
EMPLOYER ACTION
Responsibility: Management / Competent Authority
Timeline: Implementation of recommendations within 60 days of receiving the report
Possible Actions: Warning, transfer, stoppage of increment, or termination
STEP 7
APPEAL
Responsibility: Complainant or Respondent
Timeline: Within 90 days of the recommendation (Statutory timeline confirmed by recent updates)
Authority: Chief Operating Officer (Appellate Authority)

ANNEXURE -2

ANNEXURE B: SAMPLE TEMPLATE INCIDENT REPORTING FORMAT		
S. No.	**Incident Report Sample Template**	
1	**Complainant Details**	
a	Company Name	
b	Association with the Company	Employee/Director/Vendor/Retailer/Distributor/Other
c	Name of the aggrieved employee	
d	Employee ID of the aggrieved employee	
e	Location of the aggrieved employee	
f	Department of the aggrieved employee	
2	**Alleged Offender Details**	
a	How many individuals are involved?	
b	Company Name	
c	Association with the Company	Employee/Director/Vendor/Retailer/Distributor/Other
d	Name(s) of the alleged Offender(s)	
e	Employee ID of the alleged Offender(s)	
f	Location of the alleged Offender(s)	
g	Department of the alleged Offender(s)	
3	**Witness Details**	
a	Is anyone else aware of this incident?	
b	Company Name	
c	Association with the Company	Employee/Director/Vendor/Retailer/Distributor/Other
d	Name(s) of the witness(s)	
e	Employee ID of the witness(s)	
f	Location of the witness(s)	
g	Department of the witness(s)	
4	**Incident Details**	
a	Type of Issue	Sexual Harassment
b	Date & Time of Incident	
c	Date & Time of reporting of the incident	
d	Location of the incident	
e	How long this has been happening for?	
f	Is the incident reported to Company in the past?	
g	How did you find out about this incident?	

h	Do you have evidence to support your allegations?	
i	Details of the incident (A detailed description of the incident(s) in question as well as other relevant circumstances)	
5	**Signatures & Dates**	
a	Signature of the aggrieved employee	Name: Emp Code: Signature: Date:
b	Signature of the IC - President	Name: Emp Code: Signature: Date:
c	Signature of the IC - Member	Name: Emp Code: Signature: Date:
d	Signature of the IC - Member	Name: Emp Code: Signature: Date:
e	Signature of the IC - Member	Name: Emp Code: Signature: Date:
f	Signature of the IC - Member	Name: Emp Code: Signature: Date:

Disclaimer: This Policy documemt is strictly private and confidential and is intended for the sole purpose as enumerated in the policy. The company reserves the right to alter, append or withdraw this policy either in part or in full based on management's discretion. The policy intends to create a broad outline of the human resources and related management and hence none of the benefits as mentioned in the policy creates a legal right in favor of an employee whatsoever but are solely dependent at the discretion of the Company and /or management.

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