



COMPANY MANAGEMENT SYSTEM

SEAMEC/HRE/007
Revision: 4
Date: 15/03/25

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COMPANY MANAGEMENT SYSTEM
Sexual Harassment

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4	03/25	For Implementation	DGM (HR & Admin)	President (Corp. Affairs, Legal & CS)	Approved by Director of circulation dated 13/3/25
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Owner : President (Corp. Affairs, Legal & CS)

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RECORD OF AMENDMENT

It is certified that the amendments listed below have been incorporated in this copy of the publication.

DOCUMENT TITLE: SEXUAL HARASSMENT

DOCUMENT NO:

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AMDT	AMENDED	PARA	DESCRIPTION OF CHANGES
1	01/16	-	Change in designation from CLO & CS to President (Corp. Affairs, Ops & CS)
2	12/18	-	Change in designation from President (Corp. Affairs, Ops & CS) to President (Corp. Affairs, Legal & CS)
3	02/22	-	Change in Members of Internal Complaints Committee
4	03/25	-	Change in Members of Internal Complaints Committee



1.0 INTRODUCTION

This document has been designed with the objective of guiding and controlling the conduct and behaviour for employees. The purpose of this document is to establish strict adherence to Sexual Harassment at workplace.

This policy applies to all people working with SEAMEC LIMITED, whether permanent, temporary or on contract and also with its business associates.

2.0 REFERENCE DOCUMENT

2.1 As per Vishakha Guidelines on sexual harassment in the matter of VISHAKHA vs State of Rajasthan by Supreme Court in 1997.

2.2 Sexual Harassment of Women at workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH ACT)

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3.0 CORE PRINCIPLES

Company Policy on Prevention of women against sexual harassment at the work place.

3.1 TITLE AND COMMENCEMENT:

This Policy will be called Seamec Limited policy on Protection of Women against sexual harassment at the workplace and is in force with effect from 13th February 2015. This policy complies of the provisions of the Sexual Harassment of Women at Workplace (Prevention, prohibition and Redressal) Act, 2013 and Rules made thereunder.

3.2 SCOPE:

This Policy shall apply to all persons employed at the workplace for any work of regular, temporary, ad hoc or daily wage basis, directly or through an agent / contractor, including persons working on a voluntary basis and also apprentices, trainees, probationers, agent, including consultants, Auditors and representatives of Group of the Company and includes any aggrieved woman of any age whether employed or not, who alleges sexual harassment at work place.

3.3 OBJECTIVE:

The Company firmly believes that every employee has a right to work in an environment free from harassment, intimidation or offensive behaviour and issues of harassment will be resolved without fear of reprisal. The policy is designed to take effective measure to prevent, prohibit, sexual harassment and have the mechanism to redress cases of sexual harassment and impose punishment for those responsible for sexual harassment.

3.4 POLICY:

Sexual Harassment in any form will not be permitted or tolerated or condoned by the Company including suspected sexual orientation. The use of Company property including email, Bulletin Boards or any document as a vehicle for harassment is prohibited.

3.5 PROHIBITION OF SEXUAL HARASSMENT:

Sexual Harassment in any form is strictly prohibited.

3.6 MEANING OF SEXUAL HARASSMENT AND SEXUALLY ORIENTED BEHAVIOUR AS PER DEFINITION IN ACT:

Sexual Harassment includes any one or more of the following acts or behaviour namely unwelcome sexually determined behaviour, direct or by implication, and includes physical contact and advances, a demand or request for sexual favours, sexually coloured remarks, showing pornography, any other unwelcome physical, verbal or non-verbal conduct of a sexual nature. Sexual Harassment in any form will not be permitted or tolerated or condoned by the Company.

"Sexual Harassment" should not be confused with simple friendly behaviour, if these are mutually desired and accepted. The difference between friendly behaviour and sexual harassment is that sexual harassment is an unwelcome act.

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3.7 PREVENTION OF SEXUAL HARASSMENT:

No woman shall be subjected to sexual harassment at any work place,

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;

- (I) implied or explicit promise of preferential treatment in the persons employment/promotion or;
- (II) implied or explicit threat of detrimental treatment in the persons employment/ promotion; or
- (III) implied or explicit threat about the persons present or future employment/promotion status; or
- (IV) interferes with work or creating an intimidating or offensive or hostile work environment for the persons; or
- (V) Humiliating treatment likely to affect the person's health or safety.

3.8 RIGHTS AND RESPONSIBILITIES OF EMPLOYEES:

3.8.1 Every Employee shall be entitled to a safe work environment with dignity and free from sexual harassment.

3.8.2 Every Employee shall be entitled to complain against "Sexual Harassment" to which she was subject to or which was targeted at her, to the Internal Complaints Committee or to the Chairperson or any other Member of the Internal Complaints Committee established under this policy, as the case may be.

3.8.3 Any Employee shall promptly report any incident of Sexual Harassment that comes to his/her knowledge to the Internal Complaints Committee or to the Chairperson of the Internal Complaints Committee as the case may be.

3.9 THE INTERNAL COMPLAINTS COMMITTEE:

The names and contact details of the members of the Internal Complaints Committee (ICC) is given in Annexure One. The term of office of the Internal Complaints Committee is for a period of 3 years from 15th March, 2025. On the expiry of the three-year period, the existing members of the Internal Complaints Committee (ICC) will continue to hold office, till the new Internal Complaints Committee is initiated by the Board of Directors of the Company.

3.10 POWERS AND DUTIES OF THE INTERNAL COMPLAINTS COMMITTEE:

The Internal Complaints Committee will receive the complaints on sexual harassment from the aggrieved woman, enquire into the complaints, conduct the enquiry and submit the findings on the complaint to the management along with its recommendation.

CONCILIATION:

Before the inquiry commences on the complaint the Internal Complaints Committee may institute steps for conciliation proceedings upon request of the aggrieved woman and if conciliation proceedings carried out successfully, same will be commended to the employer. No monetary settlement shall be made as a basis of conciliation.



The Internal Committee shall provide the copies of the settlement as recorded by it to the aggrieved woman and the respondent.

Upon recommendation of settlement by Internal Complaints Committee to the employer, no further inquiry will further be carried out.

COMPLAINTS PROCEDURE:

3.11.1 Any employee who is subject to sexual harassment as explained herein above or the person who has knowledge of sexual harassment will have a right to lodge a complaint to the committee or its chairperson concerning sexual harassment against an employee and such a complaint needs to be in writing.

3.11.2 Complaint to be made within 3 months form the date of Incident, in case of series of incidents within 3 months form the date of last incident. Leave granted to aggrieved women shall be in addition to the leave she would be otherwise entitled.

3.11.3 Immediately upon receipt of the Complaint, the member of the Internal Complaints Committee to whom the Complaint is made shall communicate the same to the Chairperson of the Internal Complaints Committee.

3.11.4 Before enquiry, conciliation effort can be made subject to consent of the aggrieved work women.

3.11.5 Within a period of 5 working days from the date of such communication, the Chairperson shall convene a meeting of the Internal Complaints Committee.

3.11.6 The Internal Complaints Committee shall examine the complaint and shall undertake investigation of the complaint after giving opportunities to the complainant to present her case and the respondent to give his/ her version. The Internal Complaints Committee may examine witness from both the sides and also give opportunity of cross-examining of the witness. Documents if any produced by the parties may be taken on record. Neither the complainant nor the respondent is allowed to bring in any legal practitioner to represent them in their case at any stage before the Internal Complaints Committee. The Internal Complaints Committee on completion of the inquiry will submit its report to the complainant, respondent and the company management. The Internal Complaints Committee shall enquire into the complaints as prescribed under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, and the Rules made thereunder as in force from 10th February 2015 and changes made thereunder from time to time. The ICC is bound to complete the inquiry in the matter within a period of 90 days from the lodgment.

3.12 ACTION DURING PENDENCY OF PROCEEDINGS:

During the Pendency of enquiry, Internal Committee may recommend to Employer to grant leave to aggrieved woman up to 3 months and may restrain respondent from reporting on work performance of aggrieved woman. In the event such leave is granted, the leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.



3.13 CONSEQUENCE OF COMPLAINT BEING PROVED:

In the event allegations made in the complaint are proved against the respondent, it will be taken as proved misconduct and the Internal Committee may recommend to management for actions against the respondent including compensation, written apology, warning, reprimand and censure withholding promotion, increment, termination from the services or such other disciplinary action as may be deemed appropriate.

3.14 CONSEQUENCE OF FALSE COMPLAINT:

In the event allegations made in the complaint are proved to be false or malicious then the Internal Committee may recommend to the management compensation, written apology, warning, reprimand and censure withholding promotion, increment, termination from the services and the management will take appropriate action in accordance with the provisions of Company's Rules.

3.15 OBLIGATIONS OF THE MANAGEMENT:

The Management of the Company shall promptly constitute Internal Complaints Committee and provide all necessary assistance for the purpose of ensuring full effective and speedy implementation of this Internal Complaints Committee constituted as above and shall implement the decisions in an expeditious manner.

In addition to above, the duties of the Employer are as under:

- Provide safe working environment at the work place which shall include safety from the persons coming into contact at the workplace
- Display at any conspicuous place in the workplace the penal consequences of sexual harassment: and the order constituting, the internal committee under sub-section (i) of section 4.
- Organise workshop and awareness programme at regular intervals for sensitising the employees with provisions of the ACT and orientation programmes for the members of the Internal Committee in the manner as may be prescribed.
- Provide necessary facilities to the Internal committee od the Local committee, as the case may be, for dealing with compliant and conducting an inquiry.
- assist in securing the attendance of respondent and witness before the Internal committee or the Local committee as the case may be.
- Make available such information to the Internal Committee or the Local committee, as the case be, as it may require having regards to the complaint made under sub-section (1) of section 9.
- Provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code (45 of 1860) or any other law for the time being in force.
- Cause to initiate action, under the Indian Penal Code (45 of 1860) or any law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee in the workplace at which the incident of sexual harassment took place.
- Treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct.
- Monitor timely submission of reports by the Internal Committee

Appeal:

Any person aggrieved with the recommendation of the ICC may prefer an appeal against the decision of the ICC, to the Court or Tribunal in accordance with the service rules applicable to the said person or where no service rules



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exist, to any civil court having jurisdiction. Such appeal to be prepared within 90 days of the recommendations of the ICC.

3.16 THIRD PARTY HARASSMENT:

In case of third-party Sexual Harassment the Internal Complaints Committee will actively assist and provide all its resources to the complainant in pursuing the complaint.

The proceedings under this policy shall not be stalled or postponed merely because the complainant is proceeding against the respondent under any other provision of civil or criminal law.

Dated: 15th March, 2025

Signature:

Place: Mumbai

Name: S.N. Mohanty

President

Corporate Affairs, Legal & Company Secretary

**COMPANY MANAGEMENT SYSTEM**SEAMEC/HRE/007
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Sr No.	Name	Designation	Company Employee/ External person	Contact Address &Email	Tel Number & Mobile Number
1.	Mrs. Pooja Gadiya	Presiding Officer	Company Employee	Kanchan building, Share-e-Punjab, Andheri East, Mumbai 400093 pgadiya@seamec.in	9359228711
2	Ms. Jennifer Cardoz	Member	Company Employee	D-05, Pratik Accord, Royal Accord Compound, Sopara Gaon, Nalasopara (West)- 401203 jcardoz@seamec.in	9619886890
3	Mrs. Simoni Kanani	Member	Company Employee	2/23,B Wing, Geeta Bhavan Building, Breach Candy, Mumbai- 400026 skanani@seamec.in	9820660610
4	Mrs. Kavitha Mishra	Member	External Person (Associated with NGO)	Flat No. 1002, Pearl Classic Building, Motilal Nagar No. 3, Near Azad Maidan, Goregaon (West), Mumbai 400104 kunuevol@gmail.com	9920620206

Dated: 15th March, 2025**Signature:****Place: Mumbai****Name: S N Mohanty****President****Corporate Affairs, Legal & Company Secretary**

N.B. The policy is in line with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Rules made thereunder as in force.