



HR POLICY

POLICY NAME: POSH

PREVENTION OF SEXUAL HARASSMENT OF WOMEN AT WORK PLACE

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1 OBJECTIVE

CottonConnect is committed to provide equal employment opportunities to its employees, i.e. no discrimination based on age, Race, color, Religion, National origin or gender. All employees are entitled to a work environment free from sexual intimidation. While this policy is primarily designed to address sexual harassment of women as required under Indian law, CottonConnect recognizes that sexual harassment can affect individuals of all genders and is committed to maintaining a workplace free from harassment for everyone. The purpose of this policy is therefore to detail out the company's approach on dealing with incidents of sexual harassment against all employees, fellow colleagues including third party personnel engaged with CottonConnect and to ensure that any incident of sexual harassment is dealt with appropriately, sensitively and expeditiously.

Sexual harassment at workplace results in a violation of the fundamental right of employees' right to equality, right to live with dignity and right to practice any profession or to carry on any occupation, trade or business which includes a right to a safe environment free from sexual harassment. All employees are required to maintain a work environment, which is free from any kind of harassment. Allegations of Sexual Harassment will be dealt with seriously, expeditiously, sensitively and kept completely confidential. Employees will be protected against victimization, retaliation for filing or reporting a complaint on sexual harassment and will also be protected from false accusations.

No one shall be subjected to sexual harassment at the workplace. The Management will endeavor to sensitize its employees in this regard.

The objective of this policy is to provide protection against sexual harassment at workplace and for the prevention and redressal of complaints of sexual harassment and for matters connected therewith or incidental thereto. No person shall be subjected to sexual harassment at any work place.

2 APPLICABILITY

Applicable to all the employees employed with CottonConnect for any work on regular, temporary, ad hoc, or daily wage basis, either directly or through a vendor (with or without the knowledge of Cotton Connect), whether the terms of employment are expressed or implied and includes a co-worker, probationer, trainee etc.

While this policy complies with the POSH Act, 2013, which protects women, CottonConnect extends the same principles of protection and redressal to **all employees**, including those of diverse gender identities.

3. DEFINITIONS:

"Act" means the Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013

“Aggrieved Person” (Internal Policy Scope) means any person employed, regardless of gender, associated and visiting the company who experiences harassment at the workplace

Note: While this policy primarily addresses complaints by women as required by law, CottonConnect encourages all employees experiencing harassment to report such incidents, which will be addressed through appropriate channels

Company or **“Establishment”** means CottonConnect

“Complainant” means the Aggrieved person as defined above.

“Employee” means all individuals who are employed/ engaged in the offices of CottonConnect on regular temporary, ad hoc or daily wage basis, either directly or through and agent, including a contractor, with or without the knowledge of the CottonConnect. Whether for remuneration or not working on a voluntary basis or otherwise whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or called by any other such name.

“Employer” means the person responsible for the management, supervision and control of the workplace, as may be notified by the company.

“Internal Complaints Committee” or **“ICC”** means committee constituted by Company as per this policy is inquiring into the matter of Sexual Harassment at Workplace.

“Policy” means this policy on prevention of sexual harassment – CottonConnect.

“Policy on Gender Inclusion”

Protection is extended to all genders, including transgender, non-binary, and gender non-conforming individuals.

Complaints from employees of any gender will be taken seriously and addressed

“Respondent” means any person (employed, associated and visiting the company) against whom aggrieved person files complaint.

“Sexual Harassment”

a) Without prejudice to the general meaning of the word sexual harassment of employees and with the exclusion of any consensual conduct between the employees, it also includes the following: -

- i) Sounds, gestures, staring, leering, gender based insults or sexist remarks, sexual overtone in any manner such as over telephone, Mobile , SMS Email, What’s app, Face book or through any other electronic media and includes any act or conduct by a person which denies or would deny equal opportunity in pursuit of employment, retention, career development or otherwise making the environment at the work place hostile, or intimidating to any person.
- ii) Any unwelcome sexually determined conduct whether physical, verbal or non-verbal, including but not limited to, sexual advances, demands or request for sexual favors, molestation, sexually nuances gestures, comments remarks or likes either verbal, textual, graphic or electronic or by any other men or action or.
- iii) Physical contact and advances or forcible physical touch or molestation of

employee or

- iv) Making sexually colored remarks to employee or
- v) Showing pornography or other offensive or derogatory pictures, cartoons, pamphlets or saying to employee.

b) The following circumstances among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual Harassment may amount of Sexual Harassment: -

- i) Implied or explicit promise of preferential treatment in her employment: - or
- ii) Implied or explicit threat of detrimental treatment in their employment; or
- iii) Implied or explicit threat about their present or future employment statues; or
- iv) Interfere with their work or creating an intimidation, offensive or hostile environment for her: or
- v) Intimidating treatment likely to affect their health or safety.
- vi) **“Workplace”** means and includes worksites of CottonConnect any place where an aggrieved person or Respondent or both is /are employed or work(s) or visit(s) in connection with work during the course of or arising out of employment in the company or any place visited by employees arising court of or during course of employment including travelling / such journey through transportation provided by the employer.

INCLUSION POLICY

CottonConnect adopts a gender-inclusive approach by:

- Recognizing that individuals of all genders can face harassment.
- Including protection against discrimination based on gender identity, gender expression, and sexual orientation.
- Providing additional redressal mechanisms for individuals not covered directly under the POSH Act (e.g., men, transgender, non-binary individuals)

INTERNAL COMPLAINTS COMMITTEE: -

3.1. CottonConnect will constitute a committee to be known as the Internal Complaint Committee or the ICC at least half of whose member will women to deal specifically for women-specific complaints under the Act

3.2. The ICC will be constituted by the employer to deal with and redress the grievances of Sexual Harassment by its employees in an impartial and confidential manner.

3.3. The ICC will comprise of at least four members. The Following members may be nominated for the internal complaints Committee:

- a) Presiding officer will be woman employee at the senior level. If senior level woman employee is not available then the presiding officer may be nominated from other offices of Cotton Connect.
- b) Two or more employee representatives from different functions having experience in social work or having legal knowledge.
- c) One member from NGO/ Associations committed to the cause of women/a person familiar with issues of Sexual Harassment may be appointed on ICC by the employer.

4.4 There will be ICC for the corporate office of CottonConnect. The ICC of the Corporate office shall have right to conduct inquiry of any complaint of Sexual Harassment in respect of any Hub office of CottonConnect in cases if required by the employer.

4.5 A list of ICC members is annexed along with the policy as Annexure. Any change in such composition will be affected in the policy by issuance of amended annexure.

4.6 The ICC, while structured as per POSH Act to address complaints from women, shall also offer a safe forum for employees of all genders, supported by other internal redressal processes as applicable

4.6. Cessation of membership

a) The management may withdraw nomination of any member including presiding officer: -

- i) if he/she violates any of provision of this policy or section 16 of the Act relating to prohibition of Publication or making known contents of complaint and inquiry proceedings;
- ii) he/she has been convicted for an offence or an inquiry into an offence under any law for the time being in the force is pending against him/her; or
- iii) he/she has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him/her; or
- iv) he/she has abused his/her position as to render his continuance in office prejudicial to the interest of the company.

In such cases the Employer will nominate another person as member in place of such member for unexpired tenure of internal complaints committee

b) The employer may nominate another person as member in place of such member of internal Complaints Committee: -

- i) If any member of internal Complaints Committee, resigns from the membership of internal Complaints Committee:
- ii) If any member of internal Complaints Committee, who is in employment of the establishment, leaves the employment for any reason whatsoever or the employment/termination is in dispute or disciplinary proceeding is going on against such member, then he/she will automatically cease to be the member of the internal complaints Committee;
- iii) In case any member dies or he/she ceases to be member for any other reason;

- iv) In case any member other withdraws from membership or rescues from complaints.
- v) if he/ she shows bias towards any party or has abused his/ her position in any manner; or
- vii) if he/ she discloses any information regarding the Complainant or the inquiry proceedings in violation of the Act; or

4.7. The Presiding officers and every member of the committee shall hold offices for such period, not exceeding three years from the date of their nomination as may be specified by the employer.

4.8. The Member appointed from the non-governmental organization ("NGO") or the associations shall be paid such fees or allowances for holding the proceedings of the Committee by the Company as may be mutually agreed between such Member and the Company in writing, subject to the Act and the Rules framed there under.

4.9 The Committee shall be governed by the Act and the Rules or any amendments thereto or any other legislation enacted later on.

4.10 The Company shall communicate the Policy to all its employees including the contact details of the members of the Committee and the procedure for lodging complaints under this Policy.

4.11 A quorum of at least 3 (three) members is required to be present for the proceedings to be conducted by the Committee. The quorum shall include the Presiding Officer, at least (2) two members, out of which one member shall be a woman.

Process of registering the complaint:

Any aggrieved person (, working directly / indirectly with CottonConnect, who alleges to have been subjected to any action of sexual harassment) may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee within a period of three months from the date of last incident.

Employees of any gender identity who experience harassment are encouraged to report it. Where complaints fall outside the direct scope of the POSH Act, CottonConnect will address it sensitively via alternative internal redressal processes.

If for any circumstances where the aggrieved person cannot be able to make the complaint in writing, any member of the ICC (Internal Complaints Committee) shall provide all the support to the employee for making the complaint in writing.

In case of any circumstances where it has been found that the aggrieved person is unable to make a complaint on account of their physical or mental incapacity, their legal heir may make a complaint under this section.

Inquiry or settlement of Complaints:

ICC will follow POSH Act procedures as outlined below for women complainants. For others, an adapted inquiry procedure led by a neutral panel (e.g., HR, DEI, legal counsel) may be constituted.

Before initiating for inquiry with the consent of the aggrieved person, the ICC may take step to settle the matter between the complainant and the respondent through conciliation. No monetary settlement is allowed to make the basis of settlement.

The settlement done as a part of conciliation should be recorded and copy must be send to the management to take actions as specified in the recommendation.

One copy each to the aggrieved person and the respondent of the settlement as recorded must be passed on.

Further to this if the aggrieved person reports that the respondent is not complying the conditions of settlement, then the ICC would proceed with the inquiry into the complaint or forward the complaint to the Police.

Inquiry of complaints:

For the purpose of making inquiry ICC have the same power as are vested in a civil court under the code of Civil Procedure, 1908 in respect of the following manner:

1. Summoning and enforcing the attendance of any person related to the inquiry and examining him
2. Requiring the discovery and production of documents
3. Any other matter which may be required for inquiry

The inquiry must be complete within a period of ninety days.

In case pendency of an inquiry, the management may

1. Transfer the aggrieved person or the respondent to any other workplace
2. Grant leave to the aggrieved person upto a period of three months (this leave is in addition to the leaves they are entitled for as per their leave account)
3. Grant such other relief to the aggrieved person as may be required

Inquiry report must be available to the concerned parties and LCC within a period of 10days from the date of completion of inquiry.

Actions / penalties in case of allegations proved:

If the allegation against the respondent has been proved after inquiry the below mentioned action must be taken: (we can also say as per rules of service agreement or organization which can cover aspects from apology to termination

1. This action is being treated as misconduct from the part of the respondent and has to apology for the same as per the service rules and regulations
2. The respondent must be issued a written warning, withholding of promotion / increments or termination of the respondent.
3. To deduct from salary / wages of the respondent or issue a order to pay such sum as

it may considered appropriate by ICC / LCC to be paid to the aggrieved person or their legal heir.

4. Such actions must be taken within 60days of the receipt of the report of inquiry.

False or Malicious Complaints:

If in any case the ICC comes to a conclusion after inquiry that the complaint raised against the respondent by the aggrieved person or their legal heir is false or produced any forged or misleading documents, it may be taken as disciplinary actions as per the service rules and regulations of the company which may lead to the termination of the person involved in false complaints or forged documents.

The complaints, where, mere inability to substantiate a complaint or provide adequate proof need not attract actions against the complainant.

Duties of ICC:

1. Organize workshop and awareness programs at regular interval for the entire employee for POSH.
2. Annual report about the cases registered and resolved must be submitted to management and LCC each calendar year

Duties of Management:

1. To comply with the rule of this policy
 2. To include in its annual report the number of cases filed and their disposal under the Act.
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Annexure 01:

Members of ICC with effect from 1st Mar 2026

Sr. No	Name	Role	Email ID
1	Nidhi Gupta	Chairperson	nidhi.gupta@cottonconnect.org
2	Selvin Lloyd	Member	selvin.lloyd@cottonconnect.org
3	Hemant Thakre	Member	hemant.thakre@cottonconnect.org
4	Poonam Mukul	Member	poonam.mukul@cottonconnect.org
5	Tanya Khurana	Member	tanya.khurana@cottonconnect.org
6	Kanishk Agarwal	External Consultant	kanishk.agarwal@center4posh.com

Annexure 02 :

Annual Report Format:

S. No.	Number of Complaints of Sexual Harassment received during the year	Number of complaints disposed off during the year	Number of cases pending for more than 90 days	Number of workshops or awareness program against sexual harassment carried out	Nature of actions taken by the employer

Signed By

ICC Team

Reviewed By

Approved By

Abhishek Nambiar

HR Department

Chief People Officer