



TECHFLOW ENGINEERS (I) PVT. LTD

Unit 415, Building 2(A-3), Sector - 1 Millennium Business Park, Mahape. Navi Mumbai - 400710, Maharashtra, India.

CIN No: U28910MH2009PTC198086

Tel: +91 22 2778 2401 VOIP: +1 205 683 1822 Web: www.techflowengg.com

16. Harassment Policy & Sexual Harassment Policy:

Policy Statement

To establish a policy prohibiting harassment on the basis of any protected classification (such as gender, race, national origin, religion etc.) and to provide employees with a vehicle to report prohibited harassment on the part of coworkers, supervisors, visitors, customers or any other individual that they may encounter in the workplace.

Scope of the Policy

The policy covers all TEIPL employees and protects employees from harassment & sexual harassment by coworkers, supervisors, visitors, customers or any other individuals that they may encounter in the work place or during official visit.

16.1 Harassment includes, but not limited to:

- Misconduct which creates a hostile work environment because of an employee's race, color, sex, religion, national origin, physical or mental disability, age, or sexual orientation.
- Reassignment by management to undesirable work or management refusing to acknowledge an employee who has reported a harassment violation because the employee has complained about harassment.
- Any other conduct that might be considered offensive by a group of employees or an individual, and/or which
 creates a hostile work environment.
- Submission to such conduct is explicitly or implicitly a condition of employment (explicit shall mean, "Definite, clearly stated," and implicit shall mean "implied").
- Submission to or rejection of such conduct is used as the basis for employment decisions.
- Such behavior has the purpose or effect of "unreasonably" interfering with an individual's performance on the job or creating an intimidating, hostile, or offensive work environment.
- Physical Harassment includes hitting, pushing, or other aggressive physical contact or threats of physical
 harm that are either implicit or explicit. Verbal Harassment includes derogatory or vulgar comments or the
 distribution of written or graphic material regarding a person's sex, religion, age, ethnic heritage, physical
 appearance, or threatening physical harm, or the distribution of written or graphic material having such
 effects.

Violation of this harassment policy will result in disciplinary action, up to and including discharge.

16.2 Sexual Harassment:

- At TEIPL, we follow strict PoSH Policy according to the PoSH Act, 2013 (The Sexual Harassment of Woman at Workplace (Prevention, Prohibition, and Redressal). The purpose of this Policy is to provide a safe, secure and enabling environment, free from sexual harassment to every woman and ensure that the employees are treated with dignity and respect by other employees of the organization.
- Further, the Policy endeavors to protect its women employees at any place visited by her which arises out of or during the course of her employment with the organization including transportation provided by the organization.
- In case if the complaint registered is malicious or false, the ICC will have the right to take appropriate actions against such employee, including termination of employment.





TECHFLOW ENGINEERS (I) PVT. LTD

Unit 415, Building 2(A-3), Sector - 1 Millennium Business Park, Mahape. Navi Mumbai - 400710, Maharashtra, India.

CIN No: U28910MH2009PTC198086

Tel: +91 22 2778 2401 VOIP: +1 205 683 1822 www.techflowengg.com

- It is very important for all the employees to understand the concept of sexual harassment and if an employee is going through such scenarios in office or during official visits, must be reported immediately to the HR so that suitable actions are taken after proper investigation.
- Employees can raise concerns and make reports without fear of reprisal. Any manager who becomes aware of possible harassment should promptly alert the management and advise the HR Department to intervene and handle the matter in a timely and confidential manner.

Following are some sexual harassment instances that happen commonly at workplace:

- Posting or showing of photographs, calendars, cartoons or other literature, which may be considered derogatory, including any and all computer based inappropriate materials of an offensive nature.
- Discussion or telling of "dirty" jokes or jokes with sexual connotation regarding an employee's anatomy mixup of personal issues with the office culture.
- Sexual Harassment consists of unwelcome sexual advances, requests for sexual favors or other verbal of physical acts of a sexual or sex-biased nature where:
- Derogatory comments of sexual nature or based on gender
- Presence of sexual visual material or pornographic material such as posters, cartoons, drawings, calendars, pinups, pictures, computer programs of sexual nature
- Written material that is sexual in nature, such as notes or e mail containing sexual comments
- Comments about clothing, personal behavior, or a person's body
- Patting, stroking grabbing or pinching one's body
- Obscene phone calls
- Telling lies or spreading rumors about a person's personal or sex life
- Rape or attempted rape and so on.

16.3 Confidential and Sensitive Matter Reporting:

We at TEIPL understand that it's pretty difficult for the victim to report the harassment; hence it's ensured that the victim & the Committee members, take steps and keep the matter confidential.

16.4 REPORTING PROCEDURE For PoSH At TEIPL:

- Anyone who feels that he/she has been subjected to conduct which violates this policy should immediately report the matter to his/her HR Head only (First point of contact, the victim employee shall not discuss the same with Reporting Manager or any colleague at workplace to ensure confidentiality). If you have not received a satisfactory response within five (5) business days from the HR after reporting any incident that you perceive to be harassment, you can approach the Internal Complaint Committee at TEIPL.
- The victim with a harassment concern should complain, and it should be in a written format to the HR (The Victim employee can complain through email by disclosing the name, department, division and location.)
- The written complaint should be submitted within 3 months from the date of incidents and a series of incidents happening.
- The roles and responsibilities of ICC is to prevent sexual harassment at the workplace.
- The complaint committee will do an investigation in a manner and create a report which contains the findings & recommendations on the particular action taken against the Respondent (Accuser of Harassment).





TECHFLOW ENGINEERS (I) PVT. LTD

Unit 415, Building 2(A-3), Sector - 1 Millennium Business Park, Mahape. Navi Mumbai - 400710, Maharashtra, India.

CIN No: U28910MH2009PTC198086

Tel: +91 22 2778 2401 VOIP: +1 205 683 1822 Web: www.techflowengg.com



Following are the Internal Complaint committee constituted by TEIPL:

Sr No.	Post of the Committee Member	Committee Members Name	Designation	Mobile Number	Email ID
1.	Presiding Officer	Mrs. Vijaya Khandekar	Director	7506325781	vijaya.khandekar@techflowengg.co m
2.	Member	Mrs. Dipti Devde	Manager- Accounts	9987311852	dipti@techflowengg.com
3.	Member	Mr. Hemant Kolhe	VP-Operations	9623443245	hemant.kolhe@techflowengg.com
4.	Member	Mrs. Vaibhavi Shah	Manager-HR	9920070160	vaibhavi.shah@techflowengg.com
5.	Member	Mr. Ramesh Jadhav	Drafting Lead	9860267100	ramesh.jadhav@techflowengg.com
6.	Member	Ms. Swarupa Sawant	Regional Head	9322073006	swarupa@techflowengg.com
7.	External Member	Mrs. Divya Shetty	Advocate	8097694184	advdivya25@gmail.com