POSH POLICY FOR MCON RASAYAN INDIA LIMITED

(Compliant with POSH Act, Companies Act, LODR, and Labour Law Requirements)

1. Objective

This Policy on Prevention of Sexual Harassment at Workplace ("POSH Policy") is framed in compliance with:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act")
- Companies Act, 2013 and the Companies (Accounts) Rules, 2014
- SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR")
- Relevant provisions under labour law and industrial standing orders

The objective is to ensure a safe, secure, and dignified working environment that is free from sexual harassment for all women employees and stakeholders of the company. This policy establishes a robust complaint redressal mechanism and mandates preventive, awareness, and sensitization programs.

2. Effective Date.

This policy came into effect from 19th December, 2022. Revised and re-adopted on 24th August, 2026.

3. Applicability

This Policy applies to all Women associated with the organization, including but not limited to:

- Full-time, part-time, temporary, contractual, ad-hoc, trainee, or intern employees
- Consultants, service providers, and vendors
- Visitors, clients, partners, and external stakeholders
- Any person interacting with the company in a professional capacity

The policy applies to all workplaces including:

- Corporate and branch offices
- Field locations, client sites, and partner institutions
- Work-related travel, off-site meetings, events, training sessions
- Remote or virtual workplaces (online meetings, emails, chats)

4. Definitions

a) **Aggrieved Woman:** A woman of any age, whether employed or not, who alleges to have been subjected to any act of sexual harassment.

b) **Respondent:** A person against whom the aggrieved woman has made a complaint.

c) **Employee:** Any person employed by the company, working in any capacity including permanent, temporary, ad hoc, contractual, daily wage, trainee, intern, volunteer, probationers, and employees through third-party contractors or apprentices.

d) **Employer:** The person responsible for management, supervision, and control of the workplace.

e) **Workplace:** Includes all office locations of the company, any place visited during the course of employment (including travel), external partner sites, virtual/digital platforms, and any event or setting where business is conducted.

f) **Internal Committee (IC):** The committee constituted in accordance with Section 4 of the POSH Act to address and redress complaints of sexual harassment. In this case, MCON Internal Complaints Committee consists of following members:

Internal Committee (IC): Registered Office, Goregaon West

Sr. No.	Post of Committee Member	Employee Designation	Designation	Mobile Number	Email Address
1.	Presiding Officer	Ms. Aesha Shah	Company Secretary & Compliance Officer	9321624063	csaesha@mconrasayan.com
2.	Member	Ms. Nisha Gorivale	Manager – Credit Control	8657448830	nisha@mconrasayan.com
3.	Member	Ms. Pooja Adivarekar	HR & Admin	8291858957	hr@mconrasayan.com
4.	Member	Mr. Mohit Darji	Sr. Graphics Designer	8655903166	designer@mconrasayan.com

5.	Member	Mr. Sachin Waghmare	AGM Commercial	8655701852	sachin@mconrasayan.com
6.	External Member	Mr. Vijay Saroj	Social Worker	9833069034	vijaysaroj198825@gmail.com

Internal Committee (IC): Corporate Office, Jogeshwari West

Sr. No.	Post of Committee Member	Employee Designation	Designation	Mobile Number	Email Address
1.	Presiding Officer	Ms. Rupa Bhandarkar	GM Accounts	9833380204	rupa@mconrasayan.com
2.	Member	Ms. Varsha Chawan	Senior Executive - Accounts	8976892533	mconvarsha03@gmail.com
3.	Member	Ms. Rukshar Shaikh	Asst. Manager - Purchase	8976705892	purchase@mconrasayan.com
4.	Member	Ms. Gojrika Ghag	Sr. Accounts Manager	8108938677	gojrika@mconrasayan.com
5.	Member	Ms. Shagufta Shaikh	Logistic Manager	9987005617	Shagufta@mconrasayan.com
6.	External Member	Mr. Vijay Saroj	Social Worker	9833069034	vijaysaroj198825@gmail.com

Internal Committee (IC): Factory Ambethi

Sr. No.	Post of Committee Member	Employee Designation	Designation	Mobile Number	Email Address
1.	Presiding Officer	Ms.Rupa Bhandarkar	GM Accounts	9833380204	rupa@mconrasayan.com

2.	Member	Mr. Pankaj Bhanushali	Asst. General Manager - Production	9638812719	manager@mconrasayan.com
3.	Member	Mr. Jayesh Pajwani	Deputy General Manager - Production	9769667511	jayesh_pajwani@rediffmail.com
4.	Member	Mr. Rahul Maurya	Manager - Production	7897803211	production@mconrasayan.com
5.	Member	Mr. Mohan Yadav	Assistant Manager - Production	9662838288	yadavmohan51451@gmail.com
6.	External Member	Mr. Vijay Saroj	Social Worker	9833069034	vijaysaroj198825@gmail.com

5. What Constitutes Sexual Harassment

Sexual harassment includes one or more of the following unwelcome acts or behavior (whether directly or by implication):

- Physical contact and advances
- Demand or request for sexual favors
- Making sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of sexual nature

In addition, the following circumstances may also amount to sexual harassment:

- Implied or explicit promise of preferential treatment in employment
- Implied or explicit threat of detrimental treatment
- Implied or explicit threat about her present or future employment status
- Interference with work or creation of an intimidating, hostile, or offensive environment
- Humiliating treatment likely to affect a woman's mental or physical health or safety

6. Internal Committee (IC) Composition

Every office, unit, or establishment of the company with 10 or more employees must constitute an Internal Committee (IC) comprising:

- **Presiding Officer:** A senior woman employee from the company

- **Two or more members:** From amongst employees committed to women's welfare or having legal/

- **One external member:** From an NGO, legal background, or an individual familiar with POSH issues

Conditions:

- At least 50% of the IC members shall be women

- The term of each member shall not exceed three years
- The IC must function independently, fairly, and confidentially

- Details of IC members and their contact information must be displayed at all workplaces and published internally

7. Complaint Mechanism

- Any aggrieved woman may make a written complaint of sexual harassment to the Internal Committee (IC) within **three months** from the date of the incident. In case of a series of incidents, the complaint must be filed within **three months from the date of the last incident**.

- The complaint must be submitted in writing. If the aggrieved woman is unable to do so due to physical or mental incapacity, a legal heir or authorized person may file it on her behalf.

- The complaint may be sent via email or submitted in person to the Presiding Officer or designated HR representative.

- Reasonable assistance must be provided to the complainant in case she is unable to draft the complaint on her own.

- The Internal Committee may, for the reasons to be recorded in writing, extend the time limit not exceeding three months, if it is satisfied that the circumstances were such that prevented the woman from filing a complaint within the said period.

8. Inquiry Process and Timelines

- Upon receipt of the complaint, the IC shall send a copy to the respondent within **7 working days**.
- The respondent must submit a written response along with supporting documents within **10 working days**.
- Both parties will be given an opportunity to present their case, including witnesses and documentation.
- The IC shall complete the inquiry within **90 days** from receipt of the complaint.
- The findings and recommendations must be submitted in a written report to the employer and both parties within **10 days** of completion.
- The employer must act on the IC's recommendations within **60 days** of receiving the report.
- Either party has the right to appeal as per the applicable service rules or within **90 days** to the appropriate authority.

9. Interim Reliefs

During the pendency of the inquiry, at the written request of the aggrieved woman, the IC may recommend to the employer one or more of the following interim reliefs for the aggrieved woman:

- **Transfer** of either the aggrieved woman or the respondent to another department or location
- **Grant of leave** to the aggrieved woman for up to **three months** (this is in addition to her regular entitled leave)
- **Restriction of contact** between aggrieved woman and respondent in the workplace
- **Any other appropriate relief** deemed necessary for the safety and well-being of the aggrieved woman

The employer must implement the recommended reliefs without delay and without prejudice to the outcome of the inquiry.

10. Disciplinary Action and Penalties

If the Internal Committee (IC) concludes that the allegation of sexual harassment is proven, it may recommend one or more of the following disciplinary actions to the employer, depending on the severity of the misconduct:

- Written apology or formal warning
- Withholding promotion, bonus, or pay increment
- Demotion or reassignment of duties
- Suspension or termination of employment
- Debarring from future supervisory or managerial roles
- Mandatory counseling or sensitization training
- Any other disciplinary action as per the applicable service rules, HR policy, or standing orders

The recommended disciplinary action must be implemented by the employer within **60 days** of receiving the IC's inquiry report.

11. Compensation to the Aggrieved Woman

The IC may recommend that the respondent pay monetary compensation to the aggrieved woman. The amount shall be determined based on:

- Mental trauma, pain, suffering, and emotional distress
- Loss in career opportunities or adverse impact on professional standing
- Medical expenses incurred due to the incident (physical or psychiatric)
- Financial status and earning capacity of the respondent
- Feasibility of making the payment in lump sum or installments

The employer shall facilitate timely execution of such compensation, without prejudice to any civil or criminal proceedings.

12. False or Malicious Complaints

If the IC concludes that the complaint was made maliciously, or knowing it to be false, or that false evidence or forged documents were submitted or made with intent to defame the respondent or mislead the Committee, it may recommend appropriate disciplinary action against the complainant, including:

- Issuance of warning
- Withholding of promotion or benefits
- Suspension or termination, in severe cases

Important Safeguard:

- A mere inability to substantiate a complaint or provide adequate evidence shall **not** be construed as false or malicious.
- The IC must provide detailed reasoning and supporting material before recommending action for false complaints.

13. Confidentiality

All proceedings, records, and information relating to the complaint, identities of the aggrieved woman, respondent, and witnesses, and the contents of the inquiry report, recommendations, and action taken shall be kept **strictly confidential** and shall only be disclosed:

- To the extent necessary for conducting the inquiry
- As required under applicable laws or judicial proceedings
- For implementation of recommendations or disciplinary action

Breach of Confidentiality:

Any person (including IC members, parties, or witnesses) who breaches confidentiality shall be liable to disciplinary action as per company policy and may also be penalized under **Section 17 of the POSH Act**.

14. Reporting Obligations and Statutory Disclosures

The Internal Committee shall submit an **Annual Report** to the **District Officer** (as per Section 21 of the POSH Act), including:

- Number of complaints of sexual harassment received in the year; Number of complaints disposed off during the year;
- Number of cases pending for more than ninety days; Nature of action taken by the employer or District Officer
- Number of workshops or awareness programme against sexual harassment carried out;

In addition, the Company shall:

- Include a disclosure on POSH compliance in its **Board's Report** under Section 134 of the Companies Act, 2013

- Ensure disclosure of compliance under **SEBI (LODR) Regulation 34(3)** and **Schedule V**, including the number of complaints filed and disposed of in the financial year

15. Preventive Measures and Awareness Building

To ensure a culture of respect and safety, the Company shall implement the following preventive steps:

- Conduct **annual mandatory POSH training** for all employees (online or offline)

- Include detailed POSH awareness sessions in **new employee induction**

- Organize **special IC training** for new IC members on law, process, and sensitivity

- Ensure **workplace displays** of POSH policy, IC member contact details, and penalties

- Publish POSH policy on the **intranet or employee portals**

- Conduct **periodic assessments** (surveys, feedback, reviews) to evaluate policy awareness and workplace safety

16. Record Retention and Confidential Documentation

To ensure compliance and data integrity, the following documentation protocols shall be followed:

- All complaint-related documents, inquiry proceedings, evidence, witness statements, and IC reports shall be maintained by the IC in **confidential storage**, both physical and digital.

- Access to records shall be restricted to IC members and authorized HR/legal personnel.

- **Complaint and inquiry records shall be retained for at least 3 years** from the date of conclusion.

- **IC meeting minutes, annual reports, and training logs** shall be retained for a minimum of **6 years**, or longer if required under applicable laws or litigation.

- The Company shall implement **IT and data privacy safeguards** to prevent unauthorized access, tampering, or disclosure.

17. Annexures and Templates

The following annexures shall be appended to and maintained along with this Policy for operational use by the IC and HR department:

- **Annexure A:** POSH Complaint Form
- **Annexure B:** POSH Inquiry Report Template
- **Annexure C:** Conciliation Consent and Closure Form
- **Annexure D:** IC Quarterly/Annual Report Template
- **Annexure E:** Employee Acknowledgment of POSH Policy (for induction)
- **Annexure F:** Training Attendance Tracker Format

These annexures shall be reviewed periodically and updated in accordance with changes in applicable laws, organizational structure, or compliance frameworks

Annexure A: POSH Complaint Form

(To be submitted to the Presiding Officer of the Internal Committee (IC))

1. Complainant Details:

- Full Name: _____
- Employee ID (if applicable): _____
- Department/Designation: _____
- Contact Number: _____
- Email ID: _____
- Location/Branch: _____

2. Respondent Details (Person Against Whom Complaint is Filed):

- Full Name: _____
- Designation/Role: _____
- Department/Team: _____
- Location/Branch: _____

3. Incident Details:

- Date(s) of Incident(s): _____
- Time(s) of Incident(s): _____
- Location(s): _____
- Was it a single incident or repeated? _____

Brief Description of the Incident(s):

(You may attach additional pages if needed)

_____

_____

4. Witness(es) (if any):

- Name(s) and contact details of any witness(es):

  _____

5. Relief Sought (optional):

- _____

Declaration:

I declare that the information provided above is true to the best of my knowledge. I understand that submitting a false complaint intentionally may result in appropriate action as per the POSH Policy.

Signature of Complainant: _____

Date: _____

Annexure B: POSH Inquiry Report Template

(Confidential – To be submitted to the Employer/Management)

1. Case Reference Number: _____

2. Name of Complainant: _____

3. Name of Respondent: _____

4. Date of Complaint Received: _____

5. Date of Completion of Inquiry: _____

6. Summary of Allegations:

(Provide a brief summary of the allegations raised by the complainant)

_____

_____

_____

7. Respondent's Response:

(Include the summary of the respondent's statement and defense)

_____

_____

_____

8. List of Documents/Records Examined:

- _____
- _____
- _____

9. Witnesses Examined (if any):

- _____
- _____

10. Findings of the Internal Committee:

(Provide a reasoned conclusion with reference to evidence and witness statements)

_____

_____

_____

11. Recommendation of the Internal Committee:

(Choose one or more, based on findings)

☐ Complaint is upheld; recommend disciplinary action

☐ Complaint is not upheld; no action recommended

☐ Complaint is found to be false/malicious

☐ Recommend compensation of ₹ _____ to the complainant

☐ Recommend interim measures already taken be continued/modified

☐ Others: _____

12. Signature of IC Members:

- Presiding Officer: _____
- Member 1: _____
- Member 2: _____
- External Member: _____

Date of Report Submission: _____

Annexure C: Conciliation Consent and Closure Form

(To be submitted jointly by both parties and approved by the Internal Committee (IC))

1. Complainant Details:

- Name: _____
- Department/Designation: _____
- Contact Number: _____

2. Respondent Details:

- Name: _____
- Department/Designation: _____
- Contact Number: _____

3. Date of Complaint Submission: _____

4. Date on which Conciliation was Requested: _____

5. Terms and Outcome of Conciliation (to be mutually agreed upon):

(Please detail any verbal or written apology, commitment, transfer, or other mutually agreed resolution.)

_____

_____

6. Statement of Agreement:

We, the undersigned, confirm that we have willingly participated in the conciliation process facilitated by the IC and are satisfied with the agreed resolution. We understand that once the terms are honored, the matter stands closed and will not proceed to formal inquiry.

Signatures:

Complainant: _____ Date: _____

Respondent: _____ Date: _____

Approved by the Internal Committee:

Presiding Officer: _____

IC Member: _____

IC Member: _____

External Member: _____

Date of Approval: _____

Annexure D: IC Quarterly / Annual Report Template

(To be prepared by the Internal Committee and submitted to the District Officer under Section 21 of the POSH Act)

Reporting Period: From: _____ To: _____
(Quarter / Financial Year)

1. Details of Internal Committee (IC):

- Name of Presiding Officer: _____
- Names of Members: _____
- External Member Name & Affiliation: _____
- Office/Unit Address: _____

2. Summary of Complaints:

Sr. No.	Nature of Complaint	Date Received	Status (Pending/Resolved)	Outcome	Remarks
1					
2					
...					

3. Number of Complaints Filed: _____

4. Number of Complaints Resolved: _____

5. Number of Pending Cases: _____

6. Number of False/Malicious Complaints (if any): _____

7. Actions Taken by the Employer (based on IC recommendations):

- _____
- _____

7. **Awareness and Capacity Building Initiatives Conducted:**

(Attach separate sheet if needed)

- No. of training sessions conducted: _____
- No. of employees trained: _____
- Sessions for IC members (Y/N): _____

- Whether Policy is displayed at all offices: __ Y / N

9. Any Other Remarks or Recommendations by IC:

Submitted By:
Presiding Officer: _____
Date: _____

Annexure E: Employee Acknowledgment of POSH Policy

(To be collected during induction and stored in employee personnel file)

I, **[Full Name]**, employee ID **[_____]**, have received, read, and understood the **POSH Policy** of the Company titled **"Policy on Prevention of Sexual Harassment at Workplace"**.

I am aware of:

- What constitutes sexual harassment
- The internal complaint mechanism and Internal Committee (IC)
- The process and timelines for inquiry and redressal
- My rights, duties, and consequences of non-compliance
- How to file a complaint or support someone who wishes to do so

I confirm that I will comply with the POSH Policy and uphold a workplace free from discrimination and harassment.

Signature of Employee: _____
Name: _____
Designation: _____
Date: _____

Annexure F: POSH Training Attendance Tracker Format

(To be maintained by the HR Department or POSH Compliance Coordinator)

Sr. No.	Date of Session	Type (Induction / Annual / IC-specific)	Location / Mode	Trainer Name	No. of Participants	Departments Covered	Signature Sheet Attached (Y/N)
1							
2							
...							

Maintained by: _____ (HR / Compliance Officer)