

# Shevie Exports LLP

## Prevention of Sexual Harassment Policy (POSH)

### Policy

SHEVIE EXPORTS LLP is an equal employment opportunity company and is committed to creating a healthy working environment that enables employees to work without fear of prejudice, gender bias and sexual harassment. The Company also believes that all employees of the Company have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence and is, therefore, punishable. POSH specifically refers to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

Organization also believes that all employees have the right to be treated with dignity. Sexual harassment at the work place or other than work place if involving employees is a grave offence. The Supreme Court has also directed companies to lay down guidelines and a forum for redressal of grievances related to sexual harassment.

### Scope

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.

Sexual harassment would mean and include any of the following:

1. Unwelcome sexual advances, requests or demand for sexual favors, either explicitly or implicitly, in return for employment, promotion, examination or evaluation of a person towards any company activity;
2. Unwelcome sexual advances involving verbal, non-verbal, or physical conduct such as sexually coloured remarks, jokes, letters, phone calls, e-mail, gestures, showing of pornography, lurid stares, physical contact or molestation, stalking, sounds, display of pictures, signs, verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance;
3. Eve teasing, innuendos and taunts, physical confinement against one's will and likely to intrude upon one's privacy;
4. Act or conduct by a person in authority which creates the environment at workplace hostile or intimidating to a person belonging to the other sex;
5. Conduct of such an act at work place or outside in relation to an Employee of SHEVIE EXPORTS LLP, or vice versa during the course of employment; and any unwelcome gesture by an employee having sexual overtones.

"Employee" means any person on the rolls of the Company including those on deputation, contract, temporary, part time or working as consultants.

### **Internal Complaints Committee**

The "Internal Complaints Committee" shall consist of a Presiding officer (Chairperson), 12 other members & 1 external member. Out of these 13 Committee members, 8 shall be women. One out of the 8 women shall be the Presiding officer (Chairperson). One of the Committee members shall be a woman from a reputed NGO / legal body / any other social work body familiar with the issues of sexual harassment. The tenure of the committee member shall be 2 years & names of the committee members shall be announced by the CEO. The CEO shall be the authority for disciplinary actions on issues relating to sexual harassment at the workplace. The committee member's name & contact details are displayed on notice board.

### **Redressal Process**

1. The aggrieved person may make, in writing or email to [Posh@shevie.com](mailto:Posh@shevie.com), a complaint of sexual harassment at the workplace to the Internal Committee, within a period of three months from the date of incident and in case of a series of incidents, within a period of three months from the date of the last incident. The Internal Complaints Committee will render reasonable assistance to person for making the complaints in writing. This time limit may further be extended for 3 months if the complaints committee is satisfied that there were circumstances that prevented the individual from filing a complaint within the specified timeline.
2. The Committee will hold a meeting with the Complainant within five days of the receipt of the complaint, but no later than a week in any case.
3. At the first meeting, the Committee members shall hear the Complainant and record her/his allegations. The Complainant can also submit any corroborative material with a documentary proof, oral or written material, etc., to substantiate his / her complaint. If the Complainant does not wish to depose personally due to embarrassment of narration of event, a lady officer for lady employees involved and a male officer for male employees, involved shall meet and record the statement.
4. Thereafter, the person against whom complaint is made may be called for a deposition before the Committee and an opportunity will be given to him / her to give an explanation, where after, an "Enquiry" shall be conducted and concluded.
5. 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.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Management.

### Enquiry Process

- The Committee shall immediately proceed with the Enquiry and communicate the same to the Complainant and person against whom complaint is made.
- The Committee shall prepare and hand over the Statement of Allegation to the person against whom complaint is made and give him / her, an opportunity to submit a written explanation if she / he so desires within 7 days of receipt of the same.
- The Complainant shall be provided with a copy of the written explanation submitted by the person against whom complaint is made.
- If the Complainant or the person against whom complaint is made 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.
- 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 complaint is made desires to tender any documents in evidence before the Committee, he / she shall supply original copies of such documents. Both shall affix his / her signature on the respective documents to certify these to be original copies.
- The Committee shall call upon all witnesses mentioned by both the parties.
- The Committee shall provide every reasonable opportunity to the Complainant and to the person against whom complaint is made, for putting forward and defending their respective case.
- The Committee shall complete the "Enquiry" within reasonable period but not beyond three months and communicate its findings and its recommendations for action to the CEO. The report of the committee shall be treated as an enquiry report on the basis of which an erring employee can be awarded appropriate punishment straightaway.
- The Committee shall be governed by such rules as may be framed by the Supreme Court orders or any other legislation enacted later on.
- The CEO will direct appropriate action in accordance with the recommendation proposed by the Committee.

**For Shevie Exports LLP**

A circular purple stamp with the text 'SHEVIE EXPORTS LLP' around the perimeter and 'MUMBAI' at the bottom. In the center of the stamp is a handwritten signature in black ink.

**Managing Partner**  
**Mr. Vivek Bulchandani**