



Posh Policy

Abilities India Pistons & Rings Ltd

GT Road Giani Border Post-Chikamberpur, Ghaziabad UP-201006

POLICY INFORMATION

Document No.	Issue No. & Date	Implementation Date	Communicated To
POLICY/ AIP/032	02 (01.07.2025)	01.07.2025	All Stakeholders, All employees, New employee and Contractors etc.

REVISION HISTORY INFORMATION

4.		
3.		
2.	01.07.2025	Overall review for structural changes
1.	30.03.2023	New Release
Issue No.	Issue Date	Amendment History

Proposed By	Approved By
CONTROLLED COPY, DATE- 01.07.2025	
HRD	Managing Director

TITLE: - Prevention of sexual harassment Policy

1. Purpose

This Prevention of Sexual Harassment Policy (“Policy”) is effective from January 1, 2022, and applies to Abilities India Pistons & Rings Ltd. (AIP).

Abilities India pistons & rings limited is committed in ensuring a safe working environment for our women employees. We consider sexual harassment of women at our workplace as a major misconduct under the services rules which is a punishable offence.

This Policy is framed in accordance with the *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”)* and the rules thereunder. In case of any inconsistency, the provisions of the Act shall prevail.

The Policy aims to:

- Promote a workplace based on equality, dignity, and respect
- Provide a safe and congenial work environment
- Promote awareness and accountability
- Prevent and prohibit sexual harassment
- Establish a robust redressal mechanism
- Define consequences of sexual harassment

2. Applicability

This Policy applies to:

- All employees (permanent, contractual, trainees, apprentices, consultants)
- Directors and management personnel
- Workers engaged through contractors or agents
- Visitors, clients, vendors, and any person interacting with AIP

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3. Scope

- This Policy covers all workplaces, including:
- Offices, plants, and project sites
- Client locations and business travel
- Company-provided transportation and accommodation
- Virtual workplaces (emails, calls, and digital platforms)

4. Key Definitions

- Aggrieved Woman: Any woman (employee or otherwise) who alleges sexual harassment
- Respondent: The person against whom a complaint is made
- Employee: Any individual working directly or indirectly with AIP
- Workplace: Any location connected with employment
- ICC (Internal Complaints Committee): A committee constituted under the POSH Act, 2013

5. Roles & Responsibilities

- Employees: Maintain respectful behaviour and report incidents promptly
- Managers: Ensure a harassment-free environment and support reporting
- Company: Ensure effective implementation, awareness, and enforcement of this Policy

6. What Constitutes Sexual Harassment

Sexual harassment includes any unwelcome act or behaviour, whether direct or implied, such as:

- Physical contact or advances
- Demand or request for sexual favours
- Sexually coloured remarks or jokes
- Showing pornography
- Any verbal, non-verbal, or physical conduct of a sexual nature

It may also include:

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- Implied or explicit promises or threats related to employment benefits
- Creation of a hostile, intimidating, or humiliating work environment
- Conduct that interferes with work or affects dignity, health, or safety

7. Internal Complaints Committee (ICC)

AIP shall constitute an Internal Complaints Committee (ICC) at each location with ten or more employees.

Composition:

- Presiding Officer (a senior woman employee)
- At least two internal members
- One external member (NGO representative or legal expert)
- Minimum 50% women members
- Each ICC member shall hold office for a period not exceeding three years from the date of nomination.

Responsibilities of ICC:

- Receive and investigate complaints
- Ensure confidentiality and fairness
- Mandatory meeting once a quarter
- Submit recommendations to management
- Prepare the annual POSH report

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8. Complaint Mechanism

A complaint must be filed within three months from the date of the incident (extendable by another three months if justified).

Complaints may be submitted:

- In writing or via email to any ICC member or at the help line number: 8062249833
- Through authorized representatives (relative, friend, co-worker, or other person with knowledge of the incident in case of incapacity of the aggrieved woman)
- Assistance will be provided if the complainant is unable to submit a written complaint
- Complaints should include details of the incident, supporting evidence, and witnesses (if available)

9. Procedure Post-Receipt of Complaint (with Timelines)

- Preliminary Assessment (Within 3–5 days)
- The ICC will review the complaint to determine if a *prima facie* case exists.
- Sensitivity and dignity of the Complainant Employee (CE) will be maintained at all times.
- Conciliation (Optional – Before Inquiry)
- Initiated only at the request of the CE.
- No monetary settlement permitted.
- Settlement to be recorded and shared with both parties.
- If terms are not complied with, a formal inquiry will be initiated.
- Initiation of Inquiry (Within 7 days of complaint)
- Formal inquiry to begin if no conciliation is requested or successful.
- Respondent (RE) to submit response within 10 days of receiving notice.
- Inquiry Process (To be completed within 90 days)
- Both parties will be given a fair hearing.
- Evidence and witnesses will be examined.
- Proceedings will follow principles of natural justice and confidentiality.
- No legal representation is permitted.
- Inquiry Report & Recommendations (Within 10 days of completion)
- ICC will submit findings and recommended actions to Management.
- Copies will be shared with both parties for representation.

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- Action by Management (Within 60 days of report)
- Management will implement recommended actions, including disciplinary measures or compensation.

10. Key Guidelines for ICC (During Decision-Making)

- Ensure confidentiality, fairness, and natural justice throughout the process
- Compensation, if awarded, shall be deducted from Respondent’s salary
- In case of non-payment, recovery may be initiated through the District Officer
- Action for malicious complaints only if intent to malign is proven (lack of evidence ≠ malicious intent)
- Action may also be taken against false witnesses or forged evidence

11. Interim Relief

During the inquiry, the ICC may recommend:

- Transfer of either party
- Grant of leave (up to three months) to the complainant
- Any other appropriate relief

12. Outcomes

If the complaint is substantiated:

- Proper Disciplinary action would be taken (ranging from warning to termination)
- Monetary compensation to the aggrieved woman can be provided (deducted from respondent’s salary)
- If required, Legal action would be taken and supported

If the complaint is not substantiated:

- Closure of the case with documented findings

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Malicious Complaints:

- Action may be taken only if malicious intent is proven
 - Lack of evidence shall not be treated as malicious intent
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13. Confidentiality

Strict confidentiality shall be maintained regarding:

- Identity of parties
 - Details of the complaint
 - Inquiry proceedings and outcome
 - Any breach of confidentiality will result in disciplinary action.
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14. Protection Against Retaliation

- No retaliation shall be permitted against the complainant, witnesses, or participants
 - Any such retaliation will invite strict disciplinary action
 - The ICC shall be reconstituted if a complaint is made against any of its members
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15. Appeal

In case of dissatisfaction with the outcome or handling of the complaint, the Complainant may escalate the matter to the Managing Director (MD) or Joint Managing Director (JMD). Additionally, an appeal may be filed within 90 days before the appropriate authority in accordance with applicable law.

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16. Awareness & Training

- Regular POSH training and workshops shall be conducted
- Awareness programs are mandatory for employees and ICC members
- ICC details and legal provisions shall be displayed prominently at workplaces

17. Legal Compliance & Reporting

The Company shall submit an annual POSH report to the appropriate authorities, including:

- Number of cases received and disposed
- Number of pending cases
- Details of awareness programs conducted
- Actions taken

18. Acknowledgement

All employees are required to:

- Acknowledge that they have read and understood this Policy
- Comply with its provisions
- Report any violations promptly
- Non-compliance with this Policy may result in disciplinary action, including termination of employment

19. Monitoring & Review

This Policy and Procedure shall be reviewed every two years from the date of implementation. The review will be initiated by the Corporate HR. In the event of any changes in employment legislation that directly impact this Policy, such changes shall be incorporated with immediate effect and communicated promptly through Unit HR

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20. ICC committee:

S. no.	Name	Designation	email ID	Phone no.
1	Romansha Arora	presiding member	romansha@aippistons.net	9650021369
2	Dr. Mridula Tandon President	external member	president@sakshingo.org	9810115972
3.	Akshita Chaudhary	Member	akshita.chaudhary@aippistons.net	8979588814
4	Minakshi	Member	minakshi@aippistons.net	8588811271
5	Deepti	Member	deepti@aippistons.net	9871252425
6	Arvind Chaudhary	Member	arind@aippistons.net	9313401756
7	Mahesh Jain	Member	mj@aippistons.net	9810269524

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