



Formerly known as: SS Retail Private Limited & SS Communication & Services Pvt. Ltd. CIN - U51599PN2016PLC164991
REGD Office : 399, 'E' Basant Bahar Road, Ratikamal Complex, Kolhapur, Maharashtra, India- 416003 Mob: +91 8600 666 111. Email - info@ssmobile.com

POLICY ON PREVENTION OF SEXUAL HARASSMENT AT WORKPLACE

Email: compliance@ssmobile.com

Website: www.ssmobile.com

1. INTRODUCTION

SS Retail Limited ("Company") is committed to providing a safe, secure and respectful work environment free from sexual harassment. This Policy is formulated in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules made thereunder. It aims to:

- Prevent sexual harassment at the workplace
- Provide a mechanism for redressal of complaints
- Promote gender equality and foster a healthy working environment.

2. SCOPE

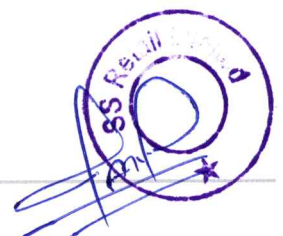
This Policy applies to:

- All employees of the Company (permanent, temporary, contractual, trainees, interns);
- Any person visiting the Company premises or attending official Company events;
- All locations of the Company including branch offices, project sites, and virtual workplaces (such as work-from-home setups and official video conferencing environments).

3. DEFINITIONS

In this Policy, unless the context otherwise requires:

- "Act" means The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- "Company" means SS Communication and Services Private Limited.
- "Employee" means any person employed by the Company, whether permanent, temporary, full-time, part-time, contractual, trainee, or intern.
- "Sexual Harassment" includes any unwelcome acts or behaviour (whether directly or by implication) as defined in Section 2(n) of the Act:
 - Physical contact and advances
 - A demand or request for sexual favours
 - Making sexually coloured remarks
 - Showing pornography
 - Any other unwelcome physical, verbal or non-verbal conduct of sexual nature





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4. INTERNAL COMMITTEE

In accordance with Section 4 of the Act, the Company has constituted an Internal Committee (IC) comprising the following members:

Name	Designation	Email ID	Tenure
Mrs. Deepa Shah	Chairperson	deepa.shah@ssmobile.com	3 years
Mrs. PranaudiMelwanki	Employee	pranaudi.melwanki@ssmobile.com	2 years
Mrs. Sarika Sakate	Employee	sarika.sakate@ssmobile.com	2 years
External member	Who is independent		

The Presiding Officer and other members of the Internal Committee shall hold office for a term not exceeding three years from the date of their nomination.

- As per Section 4(5) of the Act, the Presiding Officer or any member shall be removed if they:

- Contravene the provisions of the Act or rules,
- Have been convicted of an offence or an inquiry is pending against them,
- Are found guilty of misconduct in discharging their duties,
- Abuse their position in the Internal Committee.

- In the event of such removal, the employer shall nominate a replacement member in accordance with the Act.

5. COMPLAINT PROCEDURE

- Any aggrieved woman may make a complaint of sexual harassment in writing to the Internal Committee within a period of three months from the date of the incident.

- The complaint can be submitted physically or via email. Assistance will be provided in drafting the complaint if required.

- In case the complainant is unable to make a complaint due to physical or mental incapacity, the complaint may be filed by a relative, friend, co-worker, or other authorized person.

- The Internal Committee may extend the filing timeline for up to three additional months if sufficient cause is shown.

- In case of a series of incidents, a complaint must be made within three months from the date of the last incident.

- Where the aggrieved woman is physically or mentally incapacitated, the complaint may be filed by her relative, friend, co-worker, or any person having knowledge of the incident, with her written consent.

- In the event the aggrieved woman is deceased, her legal heir or any person with knowledge of the incident may file the complaint.

- The Internal Committee may extend the filing period for a further three months if it is satisfied that there were sufficient reasons preventing the timely submission. The reasons for such delay must be recorded in writing by the Committee.



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6. CONFIDENTIALITY

As per Section 16 of the POSH Act, the following shall be strictly kept confidential and not published, communicated, or made known to the public, press, or media in any manner:

- The identity and addresses of the aggrieved woman, respondent, and witnesses;
- Any information relating to conciliation and inquiry proceedings;
- The recommendations of the Internal Committee;
- The action taken by the employer.

Disclosure of any of the above by any person entrusted with the duty to handle or deal with the complaint, inquiry, or any related proceedings shall be liable for penalty as prescribed under the Act.

However, information may be disseminated regarding the justice secured to any victim of sexual harassment, without disclosing the identity and other particulars as mentioned above.

7. REDRESSAL ADDRESS

Upon receiving the complaint, the Internal Committee shall initiate a preliminary inquiry.

- A formal inquiry shall be completed within 90 days.
- Both parties shall be given the opportunity to be heard and present evidence.
- The IC shall submit its report to the employer within 10 days of completion of the inquiry.
- The employer shall act upon the recommendations within 60 days.

8. DISCIPLINARY ACTION

If the allegation is proven, the Company may take any of the following actions:

- Written apology
- Warning or reprimand
- Transfer or withholding of promotion/increment
- Termination of employment
- Legal recourse as per applicable laws



9. INTERIM RELIEF AND COMPENSATION

As per Section 12 of the POSH Act, during the pendency of the inquiry, the Internal Committee may recommend to the employer to:

- Transfer the aggrieved woman or the respondent to any other workplace;
- Grant leave to the aggrieved woman up to a period of three months (in addition to her entitled leave);
- Grant such other relief as may be prescribed.

The employer shall implement the recommendations made by the Internal Committee and send a report of such implementation to the Committee.

As per Section 13(3)(ii) read with Section 15 of the POSH Act, if the Internal Committee concludes that the allegation against the respondent has been proven, it may recommend:

- Deduction from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or her legal heirs.



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- The compensation amount shall be determined based on the following factors:

- Mental trauma, pain, suffering, and emotional distress caused to the aggrieved woman;
- Loss in career opportunity due to the incident;
- Medical expenses incurred by the victim for physical or psychiatric treatment;
- The income and financial status of the respondent;
- Feasibility of such payment in lump sum or in installments.

10. PROTECTION AGAINST RETALIATION

The Company strictly prohibits any retaliation against individuals who report sexual harassment or participate in an investigation. Such retaliation may include intimidation, threats, discrimination in work assignments or performance evaluation, or any other adverse employment action. Disciplinary action will be taken against any person found guilty of retaliation.

11. FALSE OR MALICIOUS COMPLAINTS

If the Internal Committee concludes that a complaint was made with malicious intent or that false evidence was provided, it may recommend appropriate disciplinary action against the complainant, in accordance with the Act. However, inability to substantiate a complaint will not attract action unless malicious intent is clearly established.

12. AWARENESS AND TRAINING

The Company shall organize regular workshops and awareness programs to sensitize employees and promote understanding of the Policy.

- All new employees shall be introduced to the POSH Policy during their onboarding process.
- Posters and materials promoting awareness shall be displayed at prominent places in the workplace.

13. ANNUAL REPORTING

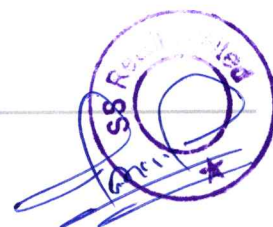
The Internal Committee shall prepare and submit an Annual Report to the Board and District Officer, detailing:

- Number of complaints received
- Number of complaints resolved
- Number of cases pending beyond 90 days
- Nature of action taken
- Number of awareness sessions conducted

14. LEGAL FRAMEWORK

This Policy is framed in accordance with the following laws and regulations:

- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013



- The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013
 - Relevant provisions of the Indian Penal Code, 1860
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15. REVIEW AND AMENDMENTS

This Policy shall be reviewed annually and may be amended by the Board of Directors as required to remain compliant with applicable laws and best practices. Any modification shall be communicated to all employees and published on the Company's website.

Approved by the Board: 05/09/2025

Effective Date: 05/09/2025

