

Sunflower Broking Private Limited- Prevention of Sexual Harassment (POSH) Policy

1. Objective

SBPL is committed to creating a safe, respectful, and inclusive work environment. This policy aims to prevent, prohibit, and provide redressal for incidents of sexual harassment at the workplace, ensuring compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.

2. Scope

This policy applies to:

- All employees (permanent, temporary, contractual, interns, and trainees).
 - Vendors, consultants, clients, and third parties associated with the organization.
 - All workplaces of SBPL, including branch offices, field locations, and any location where employees or stakeholders engage in work-related activities.
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3. Definition of Sexual Harassment

Sexual harassment includes but is not limited to:

- 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 a sexual nature.

Circumstances amounting to sexual harassment include:

- Implicit or explicit promise of preferential treatment.
 - Threats affecting employment status.
 - Creation of an intimidating or hostile work environment.
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4. Constitution of the Internal Complaints Committee (ICC)

An **Internal Complaints Committee (ICC)** will be constituted to address complaints of sexual harassment. The ICC will include:

- **Presiding Officer:** A senior female employee.
- **Two Members:** Employees committed to the cause of women or experienced in social work or law.
- **External Member:** An individual from an NGO or a professional familiar with issues related to sexual harassment.

NAME	DESIGNATION	EMAIL ADDRESS	CONTACT NUMBER
Ms. Jahanvi Dave	Director cum Presiding Officer	jhanavi@sunflowerbroking.com	9825061493
Mrs. Ami Bhavin Shah	Employee	account@sunflowerbroking.com	9510444111
Ms. Manisha Rajput	Employee	sbplcompliance@sunflowerbroking.com	8905344004
Mr. Sanjay Mukulbhai Teli	Member of NGO	telisanjay@yahoo.com	9825503555
Mr. Malay Bhow	Compliance Officer cum Nodal Officer	compliance@sunflowerbroking.com	9924920206

5. Complaint Mechanism

- **Filing a Complaint:**
Any aggrieved woman may file a complaint in writing to the ICC within three months of the incident. Assistance will be provided to draft the complaint if needed.
- **Extension:**
The ICC may extend the filing timeline by three months if sufficient reasons prevent timely filing.

6. Resolution Process

- **Conciliation:**
The ICC may attempt conciliation at the complainant's request, provided no monetary settlement is involved.
- **Inquiry:**
The ICC will conduct a fair and confidential inquiry within 90 days. Both parties will have the opportunity to present their case.
- **Actions Post-Inquiry:**
Based on findings, the ICC may recommend:
 - Disciplinary action against the respondent.
 - Compensation to the aggrieved woman.
 - Filing of police complaints in severe cases.

7. Rights and Responsibilities

- **Employer:**
 - Provide a safe working environment.
 - Display the penal consequences of sexual harassment and details of the ICC.
 - Organize awareness and training programs.
 - **Employees:**
 - Respect others and avoid any conduct that could be considered harassment.
 - Report incidents promptly to the ICC.
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8. Confidentiality

All complaints, inquiries, and proceedings shall remain strictly confidential. Breach of confidentiality may attract penalties.

9. Prohibition of Retaliation

Retaliation against complainants, witnesses, or ICC members is strictly prohibited and will result in disciplinary action.

10. False Complaints

If the ICC finds that a complaint was malicious or knowingly false, it may recommend action against the complainant, ensuring due process.

11. Training and Awareness

Regular workshops, training sessions, and awareness programs will be conducted to sensitize employees about the policy and their responsibilities.

12. Policy Review

This policy will be reviewed annually or when amendments are made to the governing laws.