

PREVENTION OF SEXUAL HARASSMENT POLICY

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PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

1. INTRODUCTION

On 17 February 2022, the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("the Act") and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 ("the Rules") were notified and brought into force.

2. COVERAGE / APPLICABILITY

Internal Complaints Committee (ICC)

The employer of a workplace employing ten (10) or more employees is required to constitute an Internal Complaints Committee ("ICC"). The ICC shall consist of at least four members, and the Presiding Officer shall be a woman employed at a senior level in the organization. At least one-half of the members shall be women.

3. PURPOSE

It is the policy of UE Presstools Limited ("the Company") to provide a workplace free from harassment of any kind, including harassment based on age, race, colour, religion, gender, creed, national origin, disability or any other factor, especially sex. Sexual harassment violates an individual's fundamental rights and personal dignity, is unlawful, and will not be tolerated by the Company. The Company considers sexual harassment in all its forms to be a serious offence.

4. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment refers to any unwelcome sexual conduct, behaviour, attention or advances that are offensive, intimidating, hostile or interfere with an employee's work performance.

Examples of prohibited conduct include:

- Promising, directly or indirectly, a reward in exchange for compliance with a sexual request.
- Threatening retaliation for refusing a sexual request.
- Denying employment-related opportunities for refusing a sexual request.
- Unwelcome physical contact or touching of a sexual nature.
- Use of sexually explicit language, gestures or indecent exposure.
- Repeated sexual or romantic advances after rejection.
- Creating an offensive environment through vulgar language, sexually explicit materials or sexual stories.

Sexual harassment may be physical, verbal, non-verbal or psychological in nature. A series of incidents may collectively constitute sexual harassment even if an individual incident, taken alone, may not.

Employees are prohibited from harassing others regardless of whether such conduct occurs on Company premises or during working hours.

Sexual harassment may involve persons of any gender.

Consensual romantic relationships between employees are strongly discouraged where one employee has supervisory authority over the other.

5. SCOPE

This Policy applies to all categories of employees of the Company, including permanent employees, management personnel, workmen, temporary employees, trainees, interns and contract employees, whether working at Company premises or client locations.

6. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC)

The Company has constituted an Internal Complaints Committee to receive, investigate and redress complaints relating to sexual harassment.

Name	Designation	Contact Number	Email ID
Logambal D	Presiding Officer / Accounts Head	7305135444	uniq.engg.acc2016@gmail.com
Elakkiya M	HR Manager	7305583444	elakkiya.hrue@gmail.com
R. Rajapoopathi	Safety Officer	9659779500	maintenance@uniqueengg.co.in
Sethu	Factory Head	9176299413	sethu@uniqueengg.co.in
Gayathri Chandrasekaran	External Member / Legal Consultant	9500051053	cgayathri.acslaw@gmail.com

7. CONSTITUTION RULES

The ICC shall consist of:

- A Presiding Officer who shall be a woman employed at a senior level in the workplace.
- Not less than two employee members who are committed to the cause of women or possess experience in social work or legal knowledge.
- One external member from a non-governmental organisation, association committed to the cause of women, or a person familiar with issues relating to sexual harassment.

At least one-half of the members of the ICC shall be women.

8. COMPLAINT REDRESSAL PROCESS

An aggrieved employee may submit a written complaint or send an email complaint within three months from the date of the incident.

Where the aggrieved woman is unable to make a complaint due to physical or mental incapacity, the complaint may be made by her relatives, friends, co-workers, officers of the National or State Women's Commission, or any other person as permitted under the Act.

Upon receipt of the complaint, the ICC shall conduct an inquiry in accordance with applicable service rules or the provisions of the Act and Rules.

The inquiry shall be completed within ninety (90) days from the date of receipt of the complaint.

Where required, the ICC may refer the matter to the police for action under applicable provisions of law.

9. OBLIGATIONS OF THE EMPLOYER

The Employer shall:

1. Ensure proper constitution of the ICC at all times.
2. Assist the complainant in recording the complaint, wherever necessary.
3. Facilitate conciliation before inquiry, if requested by the aggrieved woman.
4. Ensure the Inquiry Report is submitted within ten (10) days from completion of the inquiry.
5. Maintain confidentiality of complaints, inquiry proceedings and reports.
6. Provide a safe working environment.
7. Display the POSH Policy, penal consequences of sexual harassment and ICC details at conspicuous places.
8. Conduct awareness and sensitisation programmes periodically.
9. Provide necessary facilities and support to the ICC.
10. Assist women employees in filing complaints under applicable laws, where required.
11. Treat sexual harassment as misconduct and initiate disciplinary action where necessary.
12. Monitor timely submission of ICC reports.

10. ANNUAL REPORT

The ICC shall submit its Annual Report to the District Officer on or before 31 January of every calendar year.

11. REPORT TO THE BOARD OF DIRECTORS

A report on complaints received, investigated, resolved and pending shall be placed before the Board of Directors. The Company's compliance with the POSH Act shall also be disclosed in the Board's Report, wherever applicable.

12. RESPONSIBILITIES OF EMPLOYEES

Employees who believe they have been subjected to sexual harassment should:

- Clearly communicate their objection to the alleged harasser, where possible.
- Complete an Incident Report.
- Report the incident immediately to the ICC.

Employees may raise concerns without fear of retaliation.

Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

13. FALSE OR MALICIOUS COMPLAINTS

Where the ICC concludes that a complaint is malicious or knowingly false, it may recommend disciplinary action against the complainant in accordance with applicable service rules.

However, inability to substantiate a complaint shall not, by itself, attract disciplinary action.

14. CONFIDENTIALITY

All complaints, inquiries and investigations shall be treated as confidential.

Information shall be disclosed strictly on a need-to-know basis and in accordance with the provisions of the Act.

All individuals involved in the complaint process shall maintain confidentiality regarding the proceedings.

All employees are requested to comply with this Policy. For any clarification or assistance, employees may contact Ms. Elakkiya, HR Manager.

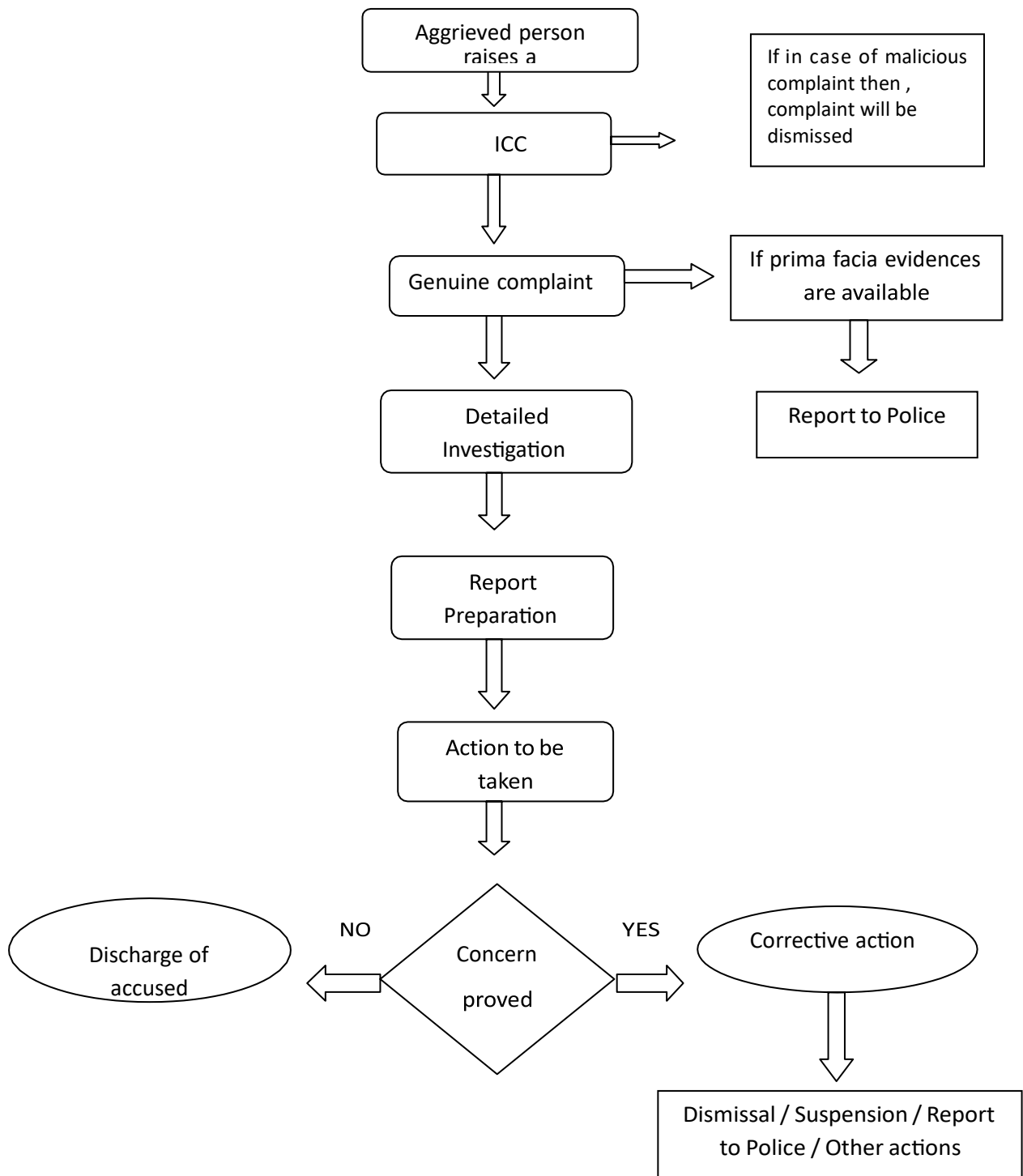
FOR UE PRESSTOOLS LIMITED

Director

Place: Chennai

Date: 11 July 2025

WORKING MECHANISM



Effective Date

This Policy is effective from 11/07/2025
