



आईटीआईलिमिटेड ITI Limited
पंजीकृत एवं निगमित कार्यालय Registered & Corporate Office
आईटीआई भवन, दूरवाणीनगर, ITI Bhavan, Dooravaninagar
बेंगलूरु Bengaluru - 560 016

Corporate HR Policy Circular No. 657

Date: 16 Jan 2026

**SUB: POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE
(PREVENTION, PROHIBITION AND REDRESSAL)**

1. The Management has accorded approval to the policy on Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal).
2. The Policy document along with Indicative Complaint Format (Annexure-I) is enclosed herewith for reference.
3. This is issued with approval of the competent authority.


SAJAN ABRAHAM
GENERAL MANAGER-HR

Encl: As above.



POLICY ON SEXUAL HARASSMENT OF WOMEN AT WORKPLACE
(PREVENTION, PROHIBITION AND REDRESSAL)

1. This policy is in accordance with the provisions of "The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013". ITI LIMITED is committed to provide a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. ITI LIMITED will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. No one will be victimized for making such a complaint.

2. **DEFINITIONS:**

- (a) **"Act"** means The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act, 2013.
- (b) **"Aggrieved woman"** means a woman, of any age whether employed or not, who alleges to have been subjected to any act of sexual harassment by any person.
- (c) **"Employee"** means a person employed at a workplace for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a co-worker, a contract worker, probationer, trainee, apprentice or called by any other such name.
- (d) **"The company"** shall mean ITI LIMITED including its Manufacturing Units/MSPs/RO's/All Project Locations and any other office under the control of ITI LIMITED.
- (e) **"ICC"** means the Internal Complaints Committee constituted as per the Act.
- (f) **"Local Committee"** means the Local Complaints Committee constituted as per the Act.
- (g) **"Presiding Officer"** means the Presiding Officer of the Internal Complaints Committee.
- (h) **"Member"** means a Member of the Internal Complaints Committee or the Local Committee.
- (i) **"Respondent"** means a person against whom the aggrieved woman has made a complaint under this policy.

"Rules" means The Sexual Harassment of Women at Workplace (Prevention, Prohibition, and Redressal) Act 2013, Rules.

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H.R. Department
Corporate Office

- (k) **"Sexual harassment"** includes
- (i) any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:-
 - (aa) physical contact and advances; or
 - (ab) a demand or request for sexual favours; or
 - (ac) making sexually coloured remarks; or
 - (ad) showing pornography; or
 - (ae) any other unwelcome physical, verbal or non-verbal conduct of sexual nature;
 - (ii) The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviour of sexual harassment may amount to sexual harassment:
 - (aa) implied or explicit promise of preferential treatment in her employment; or
 - (ab) implied or explicit threat of detrimental treatment in her employment; or
 - (ac) implied or explicit threat about her present or future employment status; or
 - (ad) interference with her work or creating an intimidating or offensive or hostile work environment for her; or
 - (ae) humiliating treatment likely to affect her health or safety
- (l) **"Workplace"** includes,
- (i) any establishment/ office/ Unit of the company, including Transit Camp/ recreation Centre/ dispensary/ Community Centre/ Sports Complex/ Games venue/ training centre/ cafeteria or any other establishment owned/ operated/ maintained/ controlled by the company.
 - (ii) any place visited by the employee arising out of or during the course of employment including transportation provided by the company for undertaking such journey;

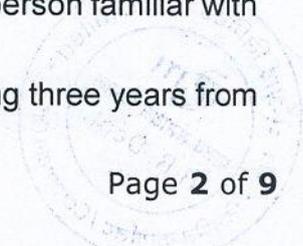
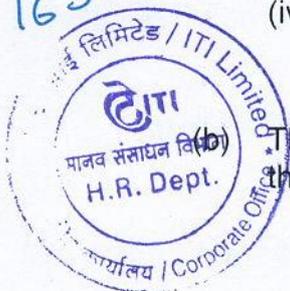
3. SCOPE AND APPLICABILITY:

This policy is applicable to all the employees and in the workplace as defined above.

4. CONSTITUTION OF INTERNAL COMPLAINTS COMMITTEE (ICC):

- (a) Internal Complaints Committee (ICC) comprising of minimum 4 members, out of which at least half of the members are woman, is to be established and the composition of ICC shall be as follows:-
- (i) A Presiding officer, who shall be a woman employed at a senior level at workplace from amongst the employees.
 - (ii) Any member who is committed to the cause of women.
 - (iii) Any member who has legal knowledge and experience in social work
 - (iv) One member from amongst non-governmental organisations or associations committed to the cause of women or a person familiar with the issues relating to sexual harassment.

The ICC member shall hold office for a period not exceeding three years from the date of their nomination.



- (c) The Member appointed from amongst the non-governmental organisations or associations shall be paid honorarium as per mutually agreed terms.
- (d) Where the Presiding Officer or any Member of the ICC,
 - (i) contravenes the provisions of section 12 of this policy; or
 - (ii) has been convicted for an offence or an inquiry into an offence under any law for the time being in force is pending against them; or
 - (iii) has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against them; or
 - (iv) has so abused their position as to render their continuance in office prejudicial to the public interest,

such Presiding Officer or Member, as the case may be, shall be removed from the Committee and the vacancy so created or any casual vacancy shall be filled by fresh nomination.

- (e) The ICC shall be governed by the other provisions specified in the Act and the Rules.

5. COMPLAINT:

- (a) Any aggrieved woman may make, in writing, a complaint of sexual harassment at workplace to the Internal Complaints Committee(ICC), in the indicative format at **Annexure-I**, within a period of three months from the date of incident/ last incident. In any case where a complaint cannot be made in writing then the presiding officer or any member of the committee shall assist the woman for making the complaint in writing. The ICC can also extend the timeline to another 3 (Three) months if it is satisfied with the reasons which prevented the lodging of a complaint within the first 3 (Three) months.
- (b) Where the aggrieved woman is unable to make a complaint on account of her physical incapacity, a complaint may be filed by:-
 - (i) her relative or friend; or
 - (ii) her co-worker; or
 - (iii) an officer of the National Commission for Women or State Women's Commission; or
 - (iv) any person who has knowledge of the incident, with the written consent of the aggrieved woman;
- (c) Where the aggrieved woman is unable to make a complaint on account of her mental incapacity, a complaint may be filed by:-
 - (i) her relative or friend; or
 - (ii) a special educator; or
 - (iii) a qualified psychiatrist or psychologist; or
 - (iv) the guardian or authority under whose care she is receiving treatment or care; or
 - (v) any person who has knowledge of the incident jointly with her relative or friend or a special educator or qualified psychiatrist or psychologist, or the guardian or authority under whose care she is receiving treatment or care;

Other provisions of the Act and the Rules governing filing of complaint shall also be considered by the ICC.

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16 Jan 2026



6. CONCILIATION:

- (a) The ICC may, before initiating an inquiry as specified herein and at the request of the aggrieved woman take steps to settle the matter between her and the respondent through conciliation; provided that no monetary settlement shall be made as a basis of conciliation. Where settlement has been arrived out of the conciliation, the ICC shall record the settlement so arrived and forward the same to the Head of HR in Corporate Office to take action as specified in the recommendation.
- (b) Further, the ICC shall provide the copies of the recorded settlement to the aggrieved woman and the respondent. Where a settlement is arrived out of the conciliation, no further inquiry shall be conducted by the ICC.

7. INQUIRY:

- (a) If the aggrieved person is not ready for conciliation or Provided that where the aggrieved woman informs the Internal Committee, as the case may be, that any term or condition of the settlement arrived at has not been complied with by the respondent, the Internal Committee shall proceed to make an inquiry into the complaint in accordance with the provisions of the CDA Rules/ Standing Orders/ Applicable Service Rules or, as the case may be, forward the complaint to the police. The ICC shall be deemed to be the inquiry authority. The ICC shall hold the inquiry into the complaints of sexual harassment guided by the principles/procedure mentioned in the CDA Rules/ Standing Orders/ Applicable Service Rules as far as practicable, and in line with Principles of Natural justice and the provisions of the Act and the Rules. The ICC is also responsible to maintain confidentiality throughout the process. The ICC shall complete the inquiry within a period of 90 (Ninety) days.
- (b) Provided further that where both the parties are employees, the parties shall, during the course of inquiry, be given an opportunity of being heard and a copy of the findings shall be made available to both the parties enabling them to make representation against the findings before the Committee.
- (c) For the purpose of making an inquiry, the ICC shall have the same powers as are vested in a civil court the Code of Civil Procedure, 1908 (5 of 1908) when trying a suit in respect of the following matters, namely:-
- (i) summoning and enforcing the attendance of any person and examining him/her on oath;
 - (ii) requiring the discovery and production of documents; and
 - (iii) any other matter which may be prescribed.

8. ACTION DURING PENDENCY OF INQUIRY:

- (a) During the pendency of an inquiry on a written request made by the aggrieved woman, the ICC may recommend the following to:
- (i) transfer the aggrieved woman or the respondent to any other workplace; or



- (ii) grant leave to the aggrieved woman up to a period of three months; or
 - (iii) grant such other relief to the aggrieved woman as may be prescribed; or
 - (iv) any other action as per the Rules.
- (b) The leave granted to the aggrieved woman under this section shall be in addition to the leave she would be otherwise entitled.

9. INQUIRY REPORT:

- (a) On the completion of an inquiry under this Act, the ICC shall provide a report of its findings to Head of HR in Corporate Office within a period of 10 (Ten) days from the date of completion of the inquiry and such report is to be made available to the concerned parties.
- (b) Where the ICC arrives at the conclusion that the allegation against the respondent has not been proved, it shall recommend to the Head of HR in Corporate Office that no action is required to be taken in the matter.
- (c) Where the ICC arrives at the conclusion that the allegation against the respondent has been proved, it shall recommend to the Head of HR in Corporate Office:
- (i) to take action for sexual harassment as a misconduct in accordance with the provisions of the CDA rules/Standing Orders/Applicable Service Rules, for minor/ major penalty, in case the employee is on rolls of ITI Limited. In case of employee of an agency/ contractor, it may prescribe suitable action as it may deem fit in accordance with the Act and the Rules and their applicable service rules.
 - (ii) to deduct, notwithstanding anything in the CDA Rules/Standing Orders/Applicable Service Rules applicable to the respondent, from the salary or wages of the respondent such sum as it may consider appropriate to be paid to the aggrieved woman or to her legal heirs, as it may determine, in accordance with the provisions of the Act.
 - (iii) In case the ICC considers so, wherever required the case may be referred to the Local Committee/ District officer, as deemed necessary.
- (d) The Head of Corporate HR shall act upon the recommendation within 60 (Sixty) days of its receipt of ICC report/recommendation.

10. PENALTY FOR FALSE OR MALICIOUS COMPLAINT/ EVIDENCE:

- (a) Where the ICC arrives at a conclusion that the allegation against the respondent is malicious or the aggrieved woman or any other person making the complaint has made the complaint knowing it to be false or the aggrieved woman or any other person making the complaint has produced any forged or misleading document, it may recommend to the Head of HR of Corporate Office to take action against the woman or the person who has made the complaint, in accordance with the provisions of the CDA Rules/Standing Orders/Service Rules applicable to the woman or the other person. In case of employee of an agency/ contractor, it may prescribe suitable action as it may deem fit in accordance with the Act and the Rules (or) refer the case to the District officer.

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[Handwritten date: 11 Jan 2026]



- (b) Where the ICC arrives at a conclusion that during the Inquiry any witness has given false evidence or produced any forged or misleading documents, it may recommend to the Head of HR of Corporate Office to take action in accordance with the provisions of the CDA Rules/Standing Orders/Applicable Service Rules to the said witness.

11. DETERMINATION OF COMPENSATION:

The ICC shall determine compensation in line with the provisions of the Act.

12. PROHIBITION OF PUBLICATION:

- (a) Notwithstanding anything contained in the Right to Information Act, 2005 (22 of 2005), the contents of the complaint made under this policy, the identity and addresses of the aggrieved woman, respondent and witnesses, any information relating to conciliation and inquiry proceedings, recommendations of the ICC, and the action taken by ITI Limited under the provisions of the Act shall not be published, communicated or made known to the public, press and media in any manner.
- (b) Penalty and other provisions as specified in the Act and the Rules shall be applicable to violations of this clause.

13. APPEAL:

Any person aggrieved on the recommendations made under this policy or non-implementation of such recommendations may prefer an appeal, within 90 (Ninety) days of such recommendation, as per the appeal procedure specified in the CDA Rules/Standing Orders/Applicable Service Rules applicable to the respondent. In case of employee of an agency/ contractor, appeal may be preferred with the concerned Appellate Authority as per the Rules.

14. RESPONSIBILITY OF THE COMPANY:

The company shall:

- (a) provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace;
- (b) display at any conspicuous place in the workplace, the penal consequences of sexual harassments; and the order constituting, the ICC as per the Act;
- (c) organise workshops and awareness programmes at regular intervals for sensitising the employees with the provisions of the Act and orientation programmes for the members of the ICC;
- (d) provide necessary facilities to the ICC or the Local Committee, as the case may be, for dealing with the complaint and conducting an inquiry;
- (e) assist in securing the attendance of respondent and witnesses before the ICC or the Local Committee, as the case may be;
- (f) make available such information to the ICC or the Local Committee, as the case be, as it may require having regard to the complaint made under this policy/ the Act/ the Rules;
- (g) provide assistance to the woman if she so chooses to file a complaint in relation to the offence under the Bharatiya Nyaya Sanhita (BNS), 2023 or any other law for the time being in force;



- (h) cause to initiate action, under the Bharatiya Nyaya Sanhita (BNS), 2023 or any other law for the time being in force, against the perpetrator, or if the aggrieved woman so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place;
- (i) treat sexual harassment as a misconduct under the CDA Rules/ Standing Orders/ Applicable Service Rules and initiate action for such misconduct;
- (j) monitor the timely submission of reports by the Internal Complaint Committee.

15. ANNUAL REPORT:

ICC shall submit the Annual Report by 15th Jan for the preceding calendar year to the District Officer and Head of HR of Corporate Office. ICC shall prepare an annual report containing the number of complaints filed, number of complaints disposed of, number of cases pending for more than 90 (Ninety) days, number of workshops or awareness sessions conducted against sexual harassment, number of ICC meetings held and the nature of the action taken against each complaint, in every calendar year and submit the same to the respective District Officer and Head of HR of Corporate Office. Details of ICC members and the annual report are to be updated on the SHe-Box portal by the respective Nodal Officers.

16. ACTS/ RULES TO PREVAIL:

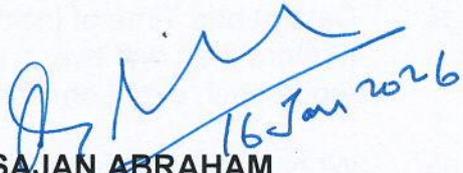
In case of any doubts or clarifications, the Act/Rules along with future amendments or modifications, if any, shall be referred to, and shall supersede the policy.

17. All employees are to strictly adhere to extant CDA Rules/ Standing Orders/ Relevant Service Rules as applicable.

18. REVIEW:

The company reserves the right to review, modify, or cancel any part of this policy at its discretion. Any amendments shall be communicated to all the officials and will come into effect upon approval by the appropriate authority.

Encl: As above


SAJAN ABRAHAM
GENERAL MANAGER-HR



ITI Limited

Indicative Complaint Format under the POSH policy

1. Name of the Complainant :
2. Staff No. :
3. Department & Unit/Office :
4. Phone Number :
5. E-mail :
6. Date :
7. Whether Complainant is the Aggrieved : Yes/No
8. If No, Reason why Aggrieved Individual :
is unable to file the complaint
9. Name of the Alleged Accused :
10. Department & Unit/Office :
11. Relationship of the Accused to the
Complainant (manager, co-worker,
client, etc.) :
12. Phone Number :
13. E-mail :
14. Date(s) and Time of Incident(s) :
(If more than one event, please
report each event on a separate form.)
15. Where did the specific event(s) occur? :
16. Please explain the events that occurred :
17. How did you react to the situation? :
18. Describe the harm you have suffered
as a result of the event :



19. Were there any witnesses to the above mentioned event(s)? (If yes, please provide their names.) :
20. Is there any physical evidence that supports your complaint? If so, please describe or attach copy of evidence :
21. Details of documents available in support of the complaint (E.g. Messages, : email, letter etc.)

The information provided in this complaint is true and correct to the best of my knowledge. I am willing to cooperate fully in the investigation of my complaint and provide whatever evidence ITI LIMITED deems relevant.

Date:

Signature:

Please submit six copies of this form to Presiding Officer, ICC. Additional sheets may be used wherever required.

