



POLICY DOCUMENT
Prevention, Prohibition and Redressal
Of
Sexual Harassment at Workplace Policy
For
Credence Prosthetics India Pvt. Ltd.

Policy Document No. : **CredPro-002-POSH Policy**
Effective Date : **1 January 2026**
Review Date : **31st December 2026**

For and on Behalf of Credence Prosthetic India Pvt. Ltd.

Tarun Kumar Kulshreshtha

Director

DIN: 01863920



1. Preamble

Credence Prosthetic India Pvt. Ltd. ("the Company") is committed to providing a safe, secure, and respectful workplace for all employees. Sexual harassment in any form is strictly prohibited and will not be tolerated.

This policy has been formulated in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("POSH Act") and its associated Rules, and reflects the Company's zero-tolerance approach towards sexual harassment.

2. Purpose

This policy aims to:

- Prevent and prohibit sexual harassment at the workplace.
- Provide a fair and effective redressal mechanism.
- Promote awareness and sensitization among all employees.

3. Scope and Applicability

This policy applies to:

- All employees, trainees, apprentices, interns (paid or unpaid), contractors, consultants, vendors, and visitors.
- All incidents occurring at the workplace or arising out of employment, including off-site meetings, business travel, and virtual/digital platforms.
- All genders (as complainants or respondents); however, as per the POSH Act, the complainant must be a woman.

4. Definition of Sexual Harassment

As per the POSH Act, sexual harassment includes one or more of the following unwelcome acts or behaviour (whether directly or by implication):

1. Physical contact and advances.
2. Demand or request for sexual favours.
3. Making sexually coloured remarks.
4. Showing pornography.
5. Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.





The following circumstances, among others, may also constitute sexual harassment:

- Implied or explicit promise of preferential treatment.
- Implied or explicit threat of detrimental treatment.
- Implied or explicit threat to affect the employment status.
- Interference with work or creation of a hostile work environment.
- Humiliating treatment likely to affect health or safety.

5. Prohibition Statement

The Company has zero tolerance for any form of sexual harassment. Such acts will invite strict disciplinary action, including termination of employment.

6. Internal Complaints Committee (ICC)

6.1 Constitution:

The Company shall constitute an Internal Complaints Committee (ICC) comprising:

- Presiding Officer: A senior woman employee.
- In the absence of a senior woman employee within the Company, a senior woman employee from another office/unit/branch of the Company shall be appointed.
- In case the other offices or administrative units of the workplace do not have a senior level woman employee, the Presiding Officer shall be nominated from any other workplace of the same employer or other department or organization.
- If such appointment is not feasible, the Presiding Officer shall be nominated from an NGO or association committed to women's rights, or a woman with experience in social work or legal matters, in accordance with Section 4(2)(a) of the POSH Act.
- One External Members: Form an NGO or with relevant legal/social worker experience.
- Two Employee Members: Preferably committed to the cause of women or with experience in social work/legal knowledge.
- Member appointed from amongst the non-governmental organizations or associations shall be paid such fees or allowances for holding the proceeding of the Internal Committee as prescribed.



6.2 Tenure:

Members shall hold office for a period of three years from the date of their nomination/appointment.

6.3 Cases when presiding officer shall be removed from the committee:

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 in accordance with the provisions of the bye-laws when presiding officer or any member.

- Contravenes the Provision of section 16
- has been found guilty in any disciplinary proceedings or a disciplinary proceeding is pending against him
- has so abused his position as to render his continuance in office prejudicial to the public interest.

6.3 Powers of ICC:

The ICC shall have the power to:

- Summon witnesses and require production of documents.
- Conduct inquiries in a fair and timely manner.
- Recommend interim reliefs during the pendency of inquiry.
- Recommend disciplinary action upon completion of inquiry.

7. Complaint Mechanism

7.1 Filing of Complaint:

- The aggrieved woman may make a complaint in writing to the ICC within three months from the date of the incident, or the last incident in case of a series.
- If unable to make a written complaint, the ICC will assist in recording it.
 - In case of physical or mental incapacity, the complaint may be filed by a legal heir, relative, friend, or co-worker.





7.2 Interim Reliefs:

During the pendency of inquiry, the ICC may recommend:

- Transfer of either party.
- Grant of up to three months' leave to the aggrieved woman.
- Any other relief deemed appropriate.

8. Inquiry Process

1. Notice to Respondent within 7 working days of receiving complaint.
2. Response Submission within 10 working days.
3. Hearings for both parties to present evidence and witnesses.
4. Confidentiality maintained at all stages.
5. Completion of inquiry within 90 days.
6. Report Submission to the employer within 10 days of completion.

9. Action on Findings

- If allegations are proven, disciplinary action may include written apology, warning, censure, withholding promotion/increment, suspension, termination, or other actions per Company rules.
- If allegations are not proven, the matter will be closed with no adverse action.
- If a complaint is malicious or false, the ICC may recommend appropriate action against the complainant, as per law.

10. Appeal

Any party aggrieved by the recommendations of the ICC may appeal to the appropriate authority under the Act within 90 days.

11. Awareness and Training

- Annual awareness Programmes for all employees.
- Display of POSH-related posters at prominent locations.
- Regular training of ICC members.



12. Confidentiality

No person shall publish or disclose any details of the complaint, inquiry, or recommendations except as required under law. Breaching will result in disciplinary action.

13. Policy Review

This policy will be reviewed annually or as required by law, and updates will be communicated to all employees.





Annexure I – Complaint Form	
Name of the Complainant:	
Employee Code:	
Designation:	
Department:	
Contact Number:	
Email:	
Details of the Respondent (Name, Designation, Department):	
Date(s) and Place(s) of Incident:	
Description of Incident(s):	
List of Witnesses (if any):	
Evidence (if any):	
Date of Complaint:	
Signature:	



Annexure II – ICC Process Flowchart

1. Complaint filed by aggrieved woman →
2. ICC reviews and sends notice to respondent →
3. Respondent submits reply →
4. Hearings conducted with evidence and witnesses →
5. ICC submits report with recommendations →
6. Employer implements recommendations →
7. Appeal (if any) within 90 days.





Annexure – III					
DETAILS OF MEMBERS OF INTERNAL COMPLAINTS COMMITTEE					
S No.	Name	Designation	Address	Email ID	Contact Number
1	S. Seethalakshmi	Chairperson / Presiding Officer	C-84, Kendriya Vihar, Sector-51, Near Sector-34 Metro Station, VTC : NOIDA, Gautam Budh Nagar, Uttar Pradesh - 201301	seetha2511@gmail.com	9811345867
2	Navin Kumar	Internal Member	Credence Prosthetic India Pvt. Ltd. SCO-134, Sector-46, Gurgaon-122002	credpro@credprosthetics.in	9350989765
3	Ram Kumar Pandey	Internal Member	Credence Prosthetic India Pvt. Ltd. SCO-134, Sector-46, Gurgaon-122002	office@credprosthetics.in	6396416813
4	Ritu Ghosh	External Member	Mobility India, Rehabilitation Research and Training Centre, 1st & 1st 'A' Cross, J.P. Nagar, 2nd Phase, Bengaluru - 560078.	ritugm@mobility-india.org	9611323004

