

	My Home Constructions Pvt. Ltd.	
	Policy on Prevention of Sexual Harassment at Workplace (POSH)	MHCPL-HR-SOP-11
		Date: 08 th Sep, 2025 Rev. Version 3

I. PURPOSE

My Home Constructions Private Limited is committed to fostering and maintaining a workplace where all employees are treated with dignity, respect, and equity.

The objective of this Policy is to:

- Prevent and prohibit sexual harassment at the workplace.
- Establish a fair, safe, and confidential mechanism for redressal of complaints.
- Ensure compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.
- Promote a safe, inclusive, and respectful organizational culture.

II. SCOPE

This Policy is applicable to all employees (permanent, temporary, fixed term contract (FTC) employees, trainees, interns, and contractual staff) of the Company including all subsidiaries, associates and affiliated companies at their work place.

The workplace includes:

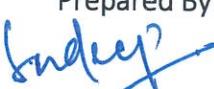
1. All company offices, project sites and other premises where the Company conducts its business operations;
2. Any place where the employee visits in connection with his/her work, during the course of and/or arising out of employment/contract with the Company, whether for client meetings, fieldwork, events or otherwise, including transportation provided for undertaking such journey.

III. DEFINITION OF SEXUAL HARASSMENT

Sexual Harassment at the workplace includes any unwelcome act, behaviour or conduct (directly or by implication) such as:

1. Unwanted physical contact or advances.
2. Requests or demands for sexual favours.
3. Offensive remarks, jokes, or comments with sexual overtones.
4. Display or circulation of obscene or sexually explicit material.
5. Any behaviour that creates an intimidating, hostile, or uncomfortable work environment.

Even jokes, pranks or compliments of a sexual nature can constitute harassment if unwelcome.

Prepared By:  VP (HR & ADMIN)	Recommended By:  Director - Projects	Approved By:  Executive Vice Chairman
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IV. INTERNAL COMPLAINTS COMMITTEE (ICC)

The Sexual Harassment at workplace (Prevention, Prohibition and Redressal) Act 2013 has stipulated that every employer of the workplace shall, by an order in writing, constitute a Committee to be known as the “Internal Complaints Committee”, which shall redress complaints on sexual harassment. The Committee shall comprise the following:

- ICC shall consist of at least four members and will have representation of men and women with at least one-half of the total members as women.
- A senior level woman employee shall be appointed as the Presiding Officer of the ICC (“Presiding Officer”). The Presiding Officer shall automatically vacate her office upon ceasing to be employee of the Company.
- Minimum two members of the ICC will be appointed from amongst employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge. The members shall automatically vacate their role as ICC member upon ceasing to be Employee of the Company.
- One member from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating to Sexual Harassment.
- The Presiding Officer and every member of the ICC shall hold office for a period of three years.
- A member of the ICC may resign at any time by tendering his / her resignation in writing to the Company.

V. RESPONSIBILITIES

- **Employees:** Maintain dignity and refrain from any conduct that could constitute sexual harassment.
- **Management:** Ensure awareness of the policy and provide training to employees.
- **ICC:** Handle complaints, conduct inquiries and recommend corrective actions.

VI. PROCEDURE TO REGISTER COMPLAINTS

1. The Company is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

➤ **Email Complaint:**

- Employees may submit a complaint by sending an email to the official POSH email ID: poshcomplaint@myhomeconstructions.com.
- Once the email is received, the Presiding Officer of the Internal Complaints Committee (ICC) will acknowledge the complaint within 7 working days and initiate the process as per the POSH Act.

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- All emails will be stored in a secure and restricted access mailbox, accessible only by ICC members, to maintain confidentiality.

➤ **Online Complaint through QR Code System**

- A dedicated QR Code system is provided at Head Office and all project sites.
- Employees can scan the QR Code, enter their complaint on the online form, review it, and submit it.
- Once submitted, the complaint is automatically and securely forwarded to the ICC for action.
- This ensures confidentiality and avoids any manual handling of complaints.

➤ **Direct Written Complaint**

Alternatively, the complainant may submit a signed written complaint directly to the Presiding Officer or any ICC member.

2. Third-Party assistance:

In case of physical/mental incapacity, a legal heir, colleague or authorized person may submit the complaint on behalf of the aggrieved individual.

3. Time limit:

Complaints should be filed within 3 months of the incident (extendable by another 3 months if justified in writing by ICC).

4. Confidentiality:

All complaints submitted either physically/online system or otherwise are secure and accessible only to the members of the ICC.

VII. INQUIRY & RESOLUTION PROCESS

1. Preliminary Scrutiny

- On receipt of a complaint, the ICC shall acknowledge it within 2 working days.
- The ICC will review if it falls within the scope of sexual harassment under the POSH Act. If not, the ICC will record reasons in writing and inform the complainant within 5 working days.

2. Conciliation (Optional)

- At the written request of the complainant, the ICC may facilitate conciliation before initiating inquiry.
- Monetary settlement shall not be permitted as a basis of conciliation.
- If conciliation is successful, the ICC will record and share the settlement with both parties and the employer within 7 working days.

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3. Formal inquiry

- If conciliation fails or is not requested, the ICC will initiate a formal inquiry.
- Both complainant and respondent will be given:
 - Equal opportunity to present their case.
 - Access to documents submitted.
 - The right to produce witnesses.
- The ICC may summon documents, examine witnesses, and exercise powers of a civil court.
- The inquiry process shall be completed within 90 days from the date of complaint.

4. Protection during inquiry

- If the respondent is a supervisor/manager directly influencing the complainant's career, reporting structure will be changed during inquiry.
- Interim measures (transfer of either party, leave for complainant, etc.) may be recommended within 5 working days of receiving the complaint.

5. Inquiry report

- The ICC shall prepare and submit a written report of findings and recommendations to the employer within 10 working days of completing the inquiry.
- Copies shall be given to both complainant and respondent.

6. Corrective action if respondent is guilty

Depending on severity, ICC may recommend:

- Written apology / mandatory counselling.
- Warning or reprimand placed in service record.
- Transfer or change of work assignment.
- Withholding promotion, increments, or training benefits.
- Suspension without pay or termination of employment.
- Deduction of appropriate compensation to the complainant, considering:
 - Trauma, distress, and medical expenses.
 - Career loss/opportunity loss.
 - Income and financial status of the respondent.

7. If complaint is false or malicious

- If the complaint is found to be deliberately false or supported with forged evidence, ICC may recommend disciplinary action against the complainant.
- However, inability to prove an allegation does not by itself make a complaint false.

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8. Implementation of ICC recommendations

The employer/management shall implement the ICC's recommendations within 60 days of receiving the report.

VIII. RECORD KEEPING & REPORTING

- ICC shall maintain confidential records of complaints, evidences and actions taken.
- Annual report to be submitted to the District Officer as mandated by law.

IX. TRAINING & AWARENESS

- Periodic workshops, posters and awareness sessions shall be organized at all sites and offices.
- All employees must undergo induction training on POSH policy.

X. AMENDMENTS

This policy may be reviewed and updated periodically by the Management in line with amendments to the Act and organizational requirements.

DETAILS OF INTERNAL COMPLAINT COMMITTEE MEMBERS:

Sr. No	Member Name	Department	Role in Committee
1	Mrs. A. Naga Lakshmi	Administration	Presiding Officer
2	Mrs. G. Sujani	Planning & QS	Member
3	Mr. K. Ravi Sai	Projects	Member
4	Mr. TSRK Varma	Legal	Member
5	Mr. K. Sudeep Kumar	Human Resources	Member
6	Ms. M. Navya	Human Resources	Member
7	Ms. Priya	External	Member

The provisions of the policy are subjected to change as per guidelines or amendments to POSH Act 2013 to be issued by the Union Government of India.

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