**CFF FLUID CONTROL LIMITED**
**CIN: U28990MH2012PLC227023**
**(Formerly known as CFF Fluid Control Private Limited)**

# PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

## 1. Introduction:

The POSH policy of CFF Fluid Control Ltd. aims to provide a safe and conducive work environment that enables employees to work without fear of prejudice, gender bias, and sexual harassment. The policy outlines the company's stance on the prevention, prohibition, and redressal of sexual harassment at the workplace in accordance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

## 2. Scope:

This policy applies to all employees, including permanent, temporary, contractual, and trainees, across all locations of the company. It covers sexual harassment occurring within the workplace and any work-related context outside the workplace.

## 3. Definition of Sexual Harassment:

Sexual harassment includes any one or more of the following unwelcome acts or behaviour (whether directly or by implication):
- Physical contact and advances
- Demand or request for sexual favours
- Making sexually coloured remarks
- Showing pornography
- Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature.

## 4. Roles & Responsibilities:

**Management:** Ensure a safe working environment, display the POSH policy prominently, and organize awareness programs.

**Employees:** Respect the dignity of colleagues, report any incidents of sexual harassment, and participate in the prevention and awareness programs.

## 5. Internal Complaints Committee (ICC)

An Internal Complaints Committee (ICC) is constituted for all offices and project sites. The committee will consist of:
**- Presiding Officer:** Ms. Manisha Varma (GM – Finance)

**- Members:** Mr. Yadnik Pawar (Hr Head), Mr. Hitesh Birla (C.F.O), Ms. Prajakta Sawant (Sr. Executive - Accounts), Ms. Deepika (Sr. Executive - Business Development)

**- External Member:** Ms. Sajita Menon (Psychology & Hr Consultant)

**6. Complaint Mechanism**

**Filing a Complaint:** Complaints must be filed in writing within 3 months of the incident. Can be submitted to the IC via email: yadnik.pawar@cffdefensys,com or to any IC member in person. Complaint timeline may be extended by 3 additional months if justified.
**Redressal Process**: The ICC will conduct a thorough inquiry in accordance with the principles of natural justice. The inquiry will be completed within 90 days from the date of the complaint.
**Actions and Penalties**: If the ICC finds the complaint to be genuine, it will recommend appropriate action to the employer. This may include disciplinary action such as a written apology, warning, reprimand, withholding of promotions or pay rise, termination of employment, or other legal actions deemed appropriate. If in any case the complaint is found to be false, a similar action may be taken against false complainant.

**7. Confidentiality:**

The identity of the complainant, respondent, and witnesses, as well as the contents of the complaint and inquiry proceedings, will be kept confidential and disclosed only to those directly involved in the process.

**8. Protection against Retaliation:**

The company will ensure that no employee who brings forth a complaint or participates in an inquiry is subject to retaliation, discrimination, or any adverse employment consequences.

**9. Awareness and Training:**

Regular workshops and training sessions will be conducted for employees to create awareness about the issues of sexual harassment and the provisions of the POSH policy.

**10. Review and Amendment:**

This policy will be reviewed periodically and amended as necessary to ensure its effectiveness and compliance with relevant legal requirements.

**Contact Information for ICC**

| Sr. No | Name | Mobile Number | Email ID | Remark |
|---|---|---|---|---|
| 1 | Ms. Manisha Varma | 88xxxxxxx0 | xxxxxxxx@cffdefensys.com | Presiding Officer |
| 2 | Mr. Yadnik Pawar | 86xxxxxxx7 | xxxxxxxx@cffdefensys.com | Member/HR |
| 3 | Mr. Hitesh Birla | 75xxxxxxx7 | xxxxxxxx@cffdefensys.com | Member |
| 4 | Ms. Dipika Gurav | 88xxxxxxx1 | xxxxxxxx@cffdefensys.com | Member |
| 5 | Ms. Prajakta Sawant | 89xxxxxxx4 | xxxxxxxx@cffdefensys.com | Member |
| 6 | Ms. Sajita Menon | 98xxxxxxx3 | xxxxxxxxx@gmail.com | External Member |

For any queries or further assistance regarding the POSH policy, please reach out to the ICC members listed above

* With effect from 23rd September 2026, the policy has been updated to reflect the replacement of one of the committee members.

By order of the Board

**For CFF Fluid Control Limited**
**(Formerly known as CFF Fluid Control Private Limited)**

**Sd/-**
**Sunil Menon**
**Managing Director**
**DIN: 00409485**