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GSTIN: 32 AAICS 2115 D1ZZ

POSH COMMITTEE

Internal Committee (IC) referred as POSH Committee, legal mandate under India's *Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013* is being formulated with our **Sea Blue Shipyard Ltd.**

The Internal Committee (IC) of Sea Blue Shipyard Limited is formally established in strict accordance with the statutory mandates of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

The legal stipulations satisfied by this constitution are detailed below

Date of Establishment:

The Management hereby constitutes the Internal Committee (IC) under the POSH Act, 2013, with effect from **14th July 2026**

Composition/Count

The Internal Committee consists of **seven (07) members**, exceeding the statutory minimum requirement of four members prescribed under the POSH Act. Women constitute the majority of the Committee and the Presiding Officer is a senior woman employee, in compliance with Section 4 of the POSH Act.

Male : 02 Nos

Female : 05 No's

Committee Members:

SL	Posh Committee Role	Person Name	M/F	Job	Contact
1	Presiding Officer	Mrs Rajasree Prabhu	F	Director	92499 53269
2	Employee (Member -1)	Mr Thomas C A	M	DGM	97574 08101
3	Employee (Member -2)	Ms Akshaya	F	Jr Engg Estimation	70255 77955
4	Employee (Member -3)	Mrs Preethi Rajan	F	Admin Asst	95620 88154
5	Employee (Member -4)	Ms Litty Sebastian	F	Jr Engineer	8848891102
6	Employee (Member -5)	Mr Prablal J	M	Scheduler	6282779909
7	External Member	Mrs Anu Anna Jacob LLB	F	Legal Professional	94969 41123

We have carefully selected individuals who are empathetic, objective, and command respect within the organization. The External Member is a law graduate with knowledge of labour laws and laws relating to women's rights and has been appointed to the Internal Committee in accordance with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The External Member will provide an independent, unbiased, and objective perspective during the inquiry and redressal process.

Sea Blue Shipyard Ltd. (by Written Order) :- We have issued an official *written order* signed by the management. Showing with the details regarding formally constitutes the committee and listed the names and designations of all members

Tenure :-The appointment letters have clearly stated that the tenure of the Presiding Officer and the committee members to be **01 year** from the date of commencement. After the term the committee will be reconstituted and members will be formally re-nominated.

Powers: The Internal Committee shall have the powers of a Civil Court under the Code of Civil Procedure, 1908, when inquiring into complaints of sexual harassment, including the power to summon individuals and request documents.

Quorum: The quorum for conducting any meeting or inquiry proceedings of the Internal Committee shall be a minimum of three members, which shall include the Presiding Officer and the External Member. No proceedings shall be valid unless the required quorum is present.

Confidentiality: All members are bound by a strict confidentiality mandate under Section 16 of the POSH Act. Any breach of confidentiality regarding the identity of the parties or the proceedings will attract immediate disciplinary action.

The Committee will function in strict compliance with the company's Anti-Sexual Harassment Policy and the statutory provisions of the POSH Act, 2013. All employees are requested to extend their full cooperation to the Internal Committee in discharging its duties.

SBSL POSH POLICY (Brief Outline)

Defining sexual harassment.

- **Physical Contact and Advances:** Any unwelcome physical intimacy, ranging from unnecessary closeness, cornering, or brushing against someone, to outright physical or sexual assault.
- **Demand or Request for Sexual Favors:** Explicitly or implicitly asking for sexual acts, dates, or personal encounters, especially when tied to professional settings.
- **Sexually Colored Remarks:** Making lewd comments, telling sexual jokes, asking inappropriate questions about someone's personal life, or making unsolicited remarks about a person's body or appearance.
- **Showing Pornography:** Displaying, sending, or sharing sexually explicit images, videos, screensavers, or text messages (including over workplace communication tools like Slack, WhatsApp, or email).
- **Any Other Unwelcome Conduct:** This includes any unwelcome verbal, physical, non-verbal, or electronic conduct of a sexual nature. Examples include leering, inappropriate staring, suggestive gestures, stalking, repeated unsolicited messages or calls, sharing sexually offensive memes, images, videos, or messages through electronic platforms such as WhatsApp, email, or other social media, and any form of cyber harassment or online sexual misconduct.

The step-by-step complaint and redressal process.

As the POSH Act lays down a strict, time-bound procedure for handling complaints we have designed to ensure fairness to both parties while preventing the organization from dragging its feet. Here is how the formal redressal process flows from start to finish.

The Redressal Timeline

- **Filing the Complaint:** Within 3 months of the incident.

- *The aggrieved woman must submit a written complaint to the Internal Committee (IC). The written complaint may be submitted either directly to the Presiding Officer of the Internal Committee or by email to the designated official POSH email address: Posh Email ID is **posh at seablue @ gmail.com**. The complainant shall submit a signed written complaint along with supporting documents and witness details, if available.*
- **Notice to the Respondent:** Within 7 working days.
 - *The IC must send one formal copy of the complaint to the accused employee (the respondent) within 7 working days of receiving it, allowing them to prepare their defence.*
- **The Respondent's Reply:** Within 10 working days.
 - *The respondent must submit their formal written reply, along with list of witnesses and supporting documents, within 10 working days from receiving the notice.*
- **Option for Conciliation:** Before starting the inquiry.
 - *Before launching a formal inquiry, the IC can, only at the explicit request of the aggrieved woman, try to resolve the matter through conciliation. Conciliation shall not involve any monetary settlement.*
- **Crucial legal rule:**
 - *No monetary settlement can be made the basis of conciliation. If a settlement is reached, the case closes here, and the IC records it.*
- **The Formal Inquiry:** Must complete within 90 days.
 - *If conciliation fails or is not chosen, the IC initiates a formal inquiry. Both parties are given a fair opportunity to be heard (Principles of Natural Justice). Neither party is allowed to bring a legal practitioner/lawyer to represent them during the proceedings.*
- **Submission of the Inquiry Report:** Within 10 days of completion.
 - *Once the inquiry concludes, the IC drafts a final report detailing its findings. It must provide a copy of this report to both the complainant and the respondent, as well as to the employer/management.*
- **Implementation of Action:** Within 60 days.
 - *The employer must act on the recommendations provided in the IC's report within 60 days. This could range from a formal warning or withholding promotion to termination or filing a police complaint, depending on the severity of the findings.*

Timelines for filing and resolving a complaint

(e.g., filing within 3 months of the incident).

- *Standard Deadline: A written complaint must be submitted to the Internal Committee (IC) within 3 months from the date of the incident.*
- *Series of Incidents: If the harassment happened multiple times over a period, the complaint must be filed within 3 months from the date of the last incident.*
- *Extensions: If the complainant is unable to file on time due to physical or mental illness, or other exceptional circumstances, the IC has the power to grant an extension of up to another 3 months. The IC must record the reasons for this extension in writing.*

Penalties for Misconduct (Respondent Found Guilty)

If the Internal Committee (IC) concludes that the allegations of sexual harassment are true, it treats the behaviour as a major workplace misconduct. The IC can recommend two types of actions to the employer:

Disciplinary Actions: -

The severity of the punishment depends on the organization's service rules and the gravity of the offense:

- **Minor Actions:** A formal written apology, a strict warning, reprimand, or censure.

- **Major Actions:** Withholding of promotions, stopping salary increments, suspension, or **termination/dismissal from service.**
- **Mandatory Training:** Requiring the respondent to undergo mandatory counseling or community service.

Financial Compensation

The law allows the IC to calculate a financial penalty to be deducted directly from the respondent's salary and paid to the victim. This is calculated based on:

- The mental trauma, pain, suffering, and emotional distress caused to the woman.
- The loss of career opportunities resulting from the harassment.
- Medical expenses incurred by the victim for physical or psychiatric treatment.
- The income and financial status of the respondent.

(Note: If the respondent has been terminated, is unable to pay, or refuses to pay the compensation, the recovery shall be carried out in accordance with the applicable provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and other applicable laws.

Penalties for Malicious Complaints (Section 14)

- If, after conducting a due inquiry, the Internal Committee (IC) concludes that a complaint was made with malicious intent or that the complainant or any witness knowingly produced false or misleading evidence, the Committee may recommend appropriate disciplinary action against the complainant or the concerned witness in accordance with Section 14 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and the Company's service rules.
- **False Evidence/Witnesses:** The exact same penalties apply to any witness who knowingly gives false evidence or produces forged, misleading documents during the inquiry.

The Critical Legal Line: Unproven vs. Malicious

There is a massive legal distinction between a complaint that **cannot be proven** and a complaint that is **malicious**. The law explicitly protects honest complainants here

The Statutory Caveat (Section 14):

A mere inability to substantiate a complaint or provide adequate proof does not attract punishment. If a woman files a genuine complaint but lacks witnesses, text messages, or physical evidence to prove it beyond a doubt, she cannot be penalized. To penalize a complainant under Section 14, the IC must find independent, concrete evidence proving malicious intent (e.g., proof of a conspiracy, blackmail texts, or confession of a fabricated story). Office rivalries or a simple retraction of a case do not automatically make a complaint legally "malicious."

Publicized the Committee

We have displayed the names, photos, email addresses, and contact numbers of the IC members in a **Notice Board** as well as on the Company's internal WhatsApp Group

Orientation and Training:-

The committee is now fully equipped to handle cases. And have conducted training sessions educating all about below

- The legal nuances of the POSH Act.
- How to conduct a fair, sensitive, and unbiased inquiry.
- Principles of natural justice.
- The absolute necessity of maintaining strict confidentiality.