
POSH (Prevention of Sexual Harassment) Policy

A. No Tolerance

- We prohibit harassment in the workplace, whether committed by or against managers, co-workers, customers, vendors, or visitors. We want you to work and develop in an environment that is respectful and productive.
- Workplace harassment based on an employee's race, color, religion, caste, sex, national origin, citizenship, age status, sexual orientation, disability or handicap, marital status, past employment or any other basis prohibited by law, will not be tolerated.
- We prohibit harassment of any kind whether it is physical, verbal or visual on any of the above characteristics at work, on Company business, or at Company sponsored events.

B. Types of Harassment at Workplace

Harassment is behavior that is unwanted, unreasonable and offensive to the recipient, which creates an intimidating, hostile or humiliating work environment for that person. There are various types of harassment which can occur at work, these can be based on (include but not limited to):

- Gender and/or sexual orientation (Sexual Harassment)
- Ethnic origin, nationality or skin color
- Religious or political convictions
- Membership or non-membership of social groups like trade union
- Disabilities, illness, sensory impairments or learning difficulties
- Age

C. Complaint Redressal Mechanism

- Anyone at work, on Company business, or at any Company sponsored function engages in conduct that makes you feel uncomfortable, we encourage you to tell that person that the conduct is unwelcome, that you find it offensive and that you request **to stop it immediately**.
- You must immediately **file a written complaint** either in person or on email to the MANCOM member within 3 months from the date of incident, which will be investigated promptly, and appropriate disciplinary action will be taken to eliminate inappropriate behavior. Creating a harassment free work environment is our responsibility.
- We will ensure that there will **be no discriminatory or retaliatory action** against any employee or

third party who reports a concern to us in good faith based on his/her personal knowledge. If a person believes that he or she has been retaliated against for reporting or participating in an investigation, he/she should immediately report such perceived retaliation to the director.

- All the reports will be **investigated confidentially**, and **strict disciplinary action** will be taken accordingly.

D. Investigation

- Once the complaint is received, an independent enquiry committee in accordance with POSH Act guidelines will be appointed to investigate the complaint confidentially in order to follow the principle of Natural Justice.
- The committee will set up a date of meeting with the complainant to gather further information wherein complainant will be allowed to be accompanied with a co member of his/her choice and any of the employee will be asked to appear before the committee.
- The whole proceeding will be carried out in the most fair and confidential manner.
- The recommendation by the committee to be given to MANCOM member within 7 working days and immediate action (if needed) to be taken as per the recommendation by the management.

E. Disciplinary Action

- If the committee finds an employee guilty of engaging in sexual harassment conduct, then the employee shall be liable to disciplinary action ranging from a warning to termination of employment as recommended by the committee.
- The company is entitled to initiate further legal action if the Prohibited Conduct also constitutes a criminal offence under any applicable law.

F. Awareness

- All the stakeholders including employees, agents, customers, vendors, partners and visitors will have access to this Policy at any given point of time and clarification related to this Policy will be addressed by the HR team.
- A brief will be given to all the employees regarding the features of this Policy immediately upon on-boarding during their initial Induction.
- The Company will comply with all other details as set out under Section 19 of the Act to ensure that all employees are provided with the safe working environment at the workplace.
- Company will display the notice showing the name of the Internal Complaints Committee members at its every establishment at a conspicuous place.
- Assistance will be provided to the woman if she so chooses to file a complaint in relation to the offence under the Indian Penal Code or any other law for the time being in force;

- Sexual harassment will be treated as a misconduct under the service rules and appropriate action will be initiated for such misconduct.

G. False Accusations

An employee who knowingly makes an allegation of sexual harassment to the committee shall be subject to disciplinary action, including termination of employment, in accordance with company rules, policies and procedures. Further, this policy may not be used as a defence by an employee against whom an adverse action has been taken by the company independent of any disclosure of information and for legitimate reasons or cause under company rules and policies.

H. Conclusion

All the matters related to Sexual Harassment will be investigated as per the guidelines of **POSH Act - Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal)** and investigations will be conducted under the principles of natural justice, basis of fundamental fairness, in an impartial and confidential manner so as to protect the identity of all viz., the person bringing the charge, potential witnesses, and the person accused of improper behavior. Also, all efforts shall be taken to ensure objectivity and thoroughness throughout the process of investigation.

The identity and address of the aggrieved person, respondent and witnesses must not be published or disclosed to the public or media.

The decision of Company shall be final and binding on all. However, the same is without prejudice to any recourse that Company or the individual concerned may have against the respondent and it shall not limit or restrict the rights of the Complainant and/or Company to pursue, nor shall they be precluded from pursuing, such further and other legal actions as may be available.

I. POSH Committee

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- External Member