

POLICY ON PREVENTION, PROHIBITION AND REDRESSAL OF SEXUAL HARASSMENT AT THE WORKPLACE (POSH)

Introduction and Commitment

Embitel Technologies (India) Private Limited (hereinafter referred as “the Company”) is committed to provide a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The Company will not tolerate any form of sexual harassment and is committed to take all necessary steps to ensure that its employees are not subjected to any form of harassment. To ensure the commitment of the Company it sets the following Anti-Sexual Harassment Policy (hereinafter referred as “the Policy” under **The Sexual Harassment of Women at Workplace (Prevention, Prohibition & Redressal) Act, 2013** and its Rules (hereinafter referred as “the Act”).

This policy is to define the guidelines and the process to be followed in order to provide protection against sexual harassment of employees at workplace and for the prevention and redressal of complaints of sexual harassment in addition the matters connected therewith or incidental thereto.

Accordingly, while the Policy covers all the key aspects of the Act, for any doubt or further clarification reference shall always be made to the Act and the provision of the Act including any amendments, shall prevail.

This policy does not prevent any aggrieved person from taking recourse to the law of the state.

Applicability

1. This Policy is applicable to all employees of the Company deployed at the workplace who are either:
 - On the payroll of the Company, or
 - Engaged through contractors having service agreements with the Company.
2. This Policy is also applicable in case of any romantic relationships between Employees. Romantic relationships between supervising, managing or executive Employees and subordinates are strictly prohibited. If a relationship does develop between Employees, especially between a supervising Employee and his or her subordinate, management should be notified immediately so that a department transfer may be considered.

Definitions

1. **“Aggrieved Employee”** in relation to a workplace, is a person, of any age, who alleges to have been subjected to any act of Sexual Harassment.
2. **“Complainant”** shall mean any employee who has lodged a complaint of sexual harassment at the workplace and has been subjected to any act of sexual harassment by another employee.
3. **“Employee”** shall mean a person employed by the Company for any work on regular, temporary, ad hoc or daily wage basis, either directly or through an agent, including a contractor, with or, without the knowledge of the principal employer i.e. the Company, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied. It includes a co-worker, a contract worker, probationer, trainee, and apprentice or called by any other such name.
4. **“Internal Committee”** (IC) means and include an Internal Committee constituted under this Policy and under the Act.
5. **“Management”** means Company’s Managing Director/Director/ or such other officer or nominees including Human Resource (HR) head as may be authorized in this behalf by the Managing Director/Director of the Company.
6. **“Respondent” shall mean any employee against whom the complaint for sexual harassment has been lodged.**
7. **“Sexual Harassment”** may occur not only where a person uses sexual behaviour to control, influence or affect the career, salary or job of another person, but also between co-workers. It may also occur between an employee of the Company and someone that the employee deals within the course of his/her work who is not employed by the Company.
8. **“Workplace”** includes all offices, branches, factories, premises, locations, units and workshops established, owned or controlled by the Company located anywhere in India. It also includes any place visited by the employees arising out for during the course of employment including transportation provided by the Company for undertaking the journey.

Sexual Harassment

Sexual Harassment means and includes but is not limited to any of the following unwelcome acts or behaviour (whether directly or by implication):

- Physical contact and advances; or
- A demand or request for sexual favours; or
- Making sexually coloured remarks; or
- Showing pornography; or
- Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behaviours or Sexual Harassment may amount to Sexual Harassment:

- Implied or explicit promise of preferential treatment in the employment; or

- Implied or explicit threat of detrimental treatment in the employment; or
- Implied or explicit threat about the present or future employment status; or
- Interference with her work or creating an intimidating or offensive or hostile environment for the employee; or
 - Humiliating treatment likely to affect her health or safety.
 - The reasonable person standard is used to determine whether or not the conduct was offensive and what a reasonable person would have done. Further, it is important to note that whether harassment has occurred or not, does not depend on the intention of the people but on the experience of the aggrieved employee.

Internal committee

1. In order to deal effectively with complaints pertaining to Sexual Harassment an Internal Committee (hereinafter referred as "IC") is constituted.
2. The IC comprises of the following:
 - **Presiding Officer:** A woman employed at a senior position in the Company;
 - At least two (2) members from amongst employees, committed to the cause of women and/or have had experience in social work and/or having legal knowledge
 - One external member, familiar with the issues relating to Sexual Harassment.
3. At least one half of the total members are women. The Presiding Officer and every member of IC shall hold office for a period not exceeding three (3) years, from the date of their nomination.
4. In case a senior level woman is not available, the Presiding Officer shall be nominated from other locations or organizations. Further the Presiding Officer reserves the right to nominate more members of appropriate seniority and rank in the IC to conduct enquires pertaining to sexual harassment complaints and to maintain the representation of one half of the total members of women on IC or for any other valid reason.
5. Current nominated members of the IC are given in Annexure A.
6. The IC responsibilities include but are not limited to:
 - Receiving complaints of Sexual Harassment at the Workplace.
 - Initiating and conducting inquiry as per the established procedure.
 - Submitting findings and recommendations of inquiries.
 - Coordinating with the Company in implementing appropriate action.
 - Maintaining strict confidentiality throughout the process as per established guidelines.
 - Submitting annual reports in the prescribed format.

Procedure for filing a complaint

1. A Complainant can make a complaint giving details of the sexual harassment in writing to IC within a period of three (3) months from the date of incident and in

case of series of incident within a period of three (3) months from the date of last incident. The said complaint may be submitted with the IC either through post, e-mail or can be given in person to the IC.

2. The complaint must be made in writing preferably in the manner set out in **Annexure B**, attached to this Policy. It shall mainly include –dates of the alleged incident, names of witnesses if any and must also be signed by the Complainant.
3. Further, the IC may, for the reason recorded in writing, extend the time limit not exceeding three (3) months, if it is satisfied that the circumstances were such which prevented the woman from filing a complaint within such period.
4. Where the Aggrieved Employee is unable to make the complaint on account of his/her physical or mental incapacity or death, his/her representative, as more fully described under Rule 6 of the Rules of the Act, may make a complaint.
5. If the Aggrieved Employee is unable to make a complaint in writing for any reason, the Aggrieved Employee may approach any member of IC who shall render assistance to such Aggrieved Employee for making the complaint in writing.
6. IC on receipt of such written complaint, may, if require ask the Aggrieved Employee to furnish additional information about the alleged harassment.
7. The Complainant shall submit six (6) copies of the complaint accompanied by available supporting documents and relevant details concerning the alleged act of Sexual Harassment including names and address of witnesses, if any which the Complainant believes to be true and accurate.

Redressal through conciliation

Before the IC initiates an inquiry, the complainant may request the IC to take steps to resolve the matter through conciliation provided no monetary settlement shall be made as basis of conciliation. If a settlement has been so arrived, the IC shall record the same and forward the same to the Employer and provide copies of the settlement to the Aggrieved Employee and the respondent. In such cases, no further inquiry shall be conducted by the IC.

Redressal through Inquiry

1. An overview about redressal through formal inquiry is provided in Annexure C of this Policy.
2. Redressal through formal inquiry will take place in the following cases:
 - No conciliation is requested by the Aggrieved Employee; or
 - Where the conciliation was requested by Aggrieved Employee, however no settlement was arrived at; or

- In the event of breach of any term or condition of the settlement by the Respondent.
3. IC within seven (7) working days of receipt of the complaint will forward a copy of the same to the Respondent giving him an opportunity to submit his written explanation with regard to allegation made. The Respondent is given clear instructions not to share the copy of complaint with any other Employee.
 4. The Respondent shall file his written explanation along with a list of documents, and names and addresses of witnesses, within a period of ten (10) working days from the date of receipt of the documents.
 5. The Complainant will also be given a copy of the written explanation submitted by the Respondent.
 6. The IC shall consider the reply from the respondent and initiate an inquiry. The Complainant or the Respondent to the complaint shall not be allowed to bring any legal practitioner to represent them at any stage of the proceedings before the IC. IC shall hear both the Complainant and the Respondent on date(s) intimated to them in advance.
 7. In the event of failure to attend personal hearing before IC by the Complainant or the Respondent on three (3) consecutive dates (intimated in advance), the IC shall terminate the inquiry proceedings or give an ex-parte decision. However, the IC shall serve a notice in writing to the Complainant and/or the Respondent 15 days in advance, before such termination or the ex-parte order.
 8. The inquiry process shall be completed maximum within the period of 90 days from the date of receipt of the complaint.
 9. The IC within ten (10) days from the date of completion of inquiry shall provide a report of its findings to the Management of the Company and such report shall also be forthwith made available to the Complainant and Respondent.
 10. Where the conduct of Sexual Harassment amounts to a specific offence under the Indian Penal Code (45 of 1860) or under any other law; it shall be the duty of IC to immediately inform the Complainant of his/her right to initiate action in accordance with law with the appropriate authority, and to give advice and guidance regarding the same.

Interim Relief

During pendency of the inquiry, on a written request made by the complainant, the IC may recommend to the Company to –

- Transfer the Complainant or the Respondent to any other workplace
- Grant leave to the aggrieved woman of maximum three (3) months, in addition to the leave she would be otherwise entitled

- Prevent the respondent from assessing complainant's work performance
- Grant such other relief as may be appropriate

Once the recommendations of interim relief are implemented, the Company will inform the IC regarding the same.

Third party harassment

Although it may be difficult for the Company to deal with Sexual Harassment caused to its Employees when perpetrated by a third party at Workplace, the company is nonetheless responsible for the well-being of its Employees. Accordingly, if the Aggrieved Employee faces Sexual Harassment as a result of an act or omission by any third party or outsider, the Management of the Company will take necessary and reasonable steps, as per law, to assist the Employee in terms of support and preventive action including assisting the Employee who wishes to file a complaint with the local police.

Malicious Complaint

1. Where during the course of investigation, the IC arrives at a conclusion that the complaint filed was in fact false, malicious purely with a motive to defame the Respondent, and/or the Complaint has produced any forged or misleading document, the IC may accordingly recommend the Management to take disciplinary action against the Complainant. The consequences which may result from filing a false, malicious complaint- range from -written apology, warning, withholding of promotion, suspension without pay, compensation for mental trauma caused, or even termination of employment.
2. Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant. Further, the malicious intent on part of the Complainant needs to be established through the inquiry process before any action against such Complainant is recommended by the IC to the Company.

Confidentiality

1. To protect the interests of the Aggrieved Individual , the Respondent , witnesses and others who may report incidents of Sexual Harassment, confidentiality will be maintained throughout with regard to the inquiry process, recommendations of the IC and all other matters discussed related thereto to the extent practicable and appropriate under the circumstances.
2. All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by the Company except where disclosure is required under disciplinary or other remedial processes.

Conclusion

All employees of the Company have a personal responsibility to ensure that their behaviour is not contrary to this Policy. All employees are encouraged to reinforce the maintenance of a work environment free from sexual harassment.

In conclusion, the Company reiterates its commitment to providing its Employees, a work place free from harassment/ discrimination and where every employee is treated with dignity and respect.

Annexure A

Internal Committee at **Embitel Technologies (India) Private Limited.**

Below New members introduced from 1st Jan-2026.

The IC members listed below are for the all locations Embitel operates from.

Member (Presiding Officer)	Leya Lakshmanan
Member	Manasi Kamal
Member	Ashok Kumar Ramadass
Member	Vanitha Nagarajan
Member	Sreedevi V
Member	Durga Madhaba Mishra
Member	Sharath MV
Member	Priyanka Rout
External Member	Komal (External consultant, Female)

The complaint can be submitted to the IC at POSH@embitel.com or may be physically submitted to any IC member.

Annexure B

Redressal Procedure

