

PREVENTION OF SEXUAL HARASSMENT (POSH) POLICY

OBJECT:

eMudhra (also referred as “Company”) strives to create and maintain a work environment in which people are treated with dignity, decency and respect. The environment of the company should be characterized by mutual trust and the absence of intimidation, oppression and exploitation. eMudhra will not tolerate unlawful discrimination or harassment of any kind. All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy.

SCOPE:

This policy applies to all employees (full-time, part-time, trainees and those on contractual assignments) of the Company including all subsidiaries and affiliated companies at their workplace or at client sites. The Company will not tolerate sexual harassment, if engaged in by clients or by suppliers or any other business associates.

The workplace includes:

1. All offices or other premises where the Company’s business is conducted.
2. All company-related activities performed at any other site away from the Company’s premises.
3. Any social, business or other functions where the conduct or comments may have an adverse impact on the workplace or workplace relations.

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

DEFINITION OF SEXUAL HARASSMENT:

“Sexual Harassment” includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) such as:

- i. Physical contact and advances; or
- ii. A demand or request for sexual favors; or
- iii. Making Sexually colored remarks; or
- iv. Showing pornography or other offensive or derogatory pictures, cartoons, representations, graphics, pamphlets or sayings; or

v. Any other unwelcome physical, verbal or non - verbal conduct of sexual nature; or

Following circumstances amongst other circumstances mentioned above may constitute sexual harassment if it occurs or is present in relation or connected with any act or behavior of sexual harassment:

- i. implied or explicit promise of preferential treatment in their employment;
- ii. implied or explicit threat of detrimental treatment in their employment;
- iii. implied or explicit threat about their present or future employment status;
- iv. interfering with their work or creating an intimidating or offensive or hostile work environment; humiliation treatment likely to affect their health or safety.
- v. humiliating treatment likely to affect the health and safety of the aggrieved person.

In addition to the instances mentioned hereinabove, any other acts or behavior, which outrages the modesty of an employee, will be considered as sexual harassment.

INTERNAL COMPLAINTS COMMITTEE (ICC) :

The Company has instituted a Complaints Committee for redressal of sexual harassment complaint, made by the aggrieved, and for ensuring time bound treatment of such complaints. Initially, and till further notice, the Complaints Committee will comprise of the following members:

1. A presiding officer, women working at a senior level in the office
2. Any member who is committed to the cause of women
3. Any member of the company who has legal knowledge and experience in social work
4. Any external member for example NGOs, any person familiar with issues related to sexual harassment.

The Committee shall meet upon receipt of any complaint and appropriately take action on the complaint as per this Policy or shall meet at least once in a year.

PROCEDURE FOR DEALING WITH COMPLAINTS:

The complaint is needed to be lodged within 3 months from the date of incident along with any documentary evidence or names of witnesses if available, to icc@emudhra.com. The committee can also extend the timeline to another 3 months if it is satisfied with the reasons which prevented the lodging of a complaint within the first 3 months. The complaint shall be in any form wither through phone or email but every oral communication should be followed up with the written communication and in any case where a complaint cannot be made in writing

then the presiding officer or any member of the committee shall assist the person for making the complaint in writing.

In case if an aggrieved person is unable to lodge the complaint then any person who is having knowledge of the incident or any family member/ relative/ friend or co-worker can lodge the complaint on behalf of his/her. It is the responsibility of the person who receives the complaint should inform the committee members.

ICC can try and make parties to settle but monetary compensation is not the basis for settlement. If the aggrieved person is not ready to settle then ICC will inquire into the complaint and both the parties will get a chance to be heard and complete the inquiry within 90 days. After the inquiry, if the person who committed such act is found guilty then Corrective action is taken by the appropriate authority. Corrective action includes -

- 1) Formal apology
- 2) Transfer of the person to other department
- 3) Suspension or termination of services of the employee found guilty for such offence
Counselling
- 4) A written warning to the concerned employee and a copy of it are maintained in his record.

In case the complaint is found to be false, the Complainant shall, if deemed fit, be liable for appropriate disciplinary action by the Company/ Management.

The Company will ensure that the victim or witnesses are not victimized or discriminated against while dealing with complaints of sexual harassment. However, anyone who abuses the procedure (for example, by maliciously putting an allegation knowing it to be untrue) will be subject to disciplinary action.

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 :

The Company reiterates its commitment to providing its employees, a workplace free from harassment/ discrimination and where every employee is treated with dignity, decency and respect.