

Pospace Technologies Private Limited

Prevention of Sexual Harassment at Workplace Policy

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Commitment

Pospace Technologies Private Limited is committed to maintaining a positive, safe, and productive working environment for all its employees at their workplace.

Pospace Technologies Private Limited is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

Pospace Technologies Private Limited will not tolerate verbal or physical conduct of a sexual nature by any employee that harasses, disrupts, or interferes with another employee's work performance or that creates an intimidating, offensive, or hostile environment.

This policy is being formulated to meet the above objectives and to be in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 ("**Act**").

Objective

The Prevention of Sexual Harassment at Workplace Policy is aimed at protecting the dignity of all employees of Pospace Technologies Private Limited by way of preventing sexual harassment and to provide for remedial actions in cases of violation.

Applicability

The Prevention of Sexual Harassment at Workplace policy applies to all employees, including but not limited to members of the senior management, full-time and contract employees, consultants, and interns, (hereinafter singularly or collectively referred to as "Employees") of Pospace Technologies Private Limited. This policy is also applicable to all employees currently working for Pospace Technologies Private Limited but on the payroll of any other member firm / subsidiaries of Pospace Technologies Private Limited in India.

The workplace definition includes:

- 1) All offices or other premises where Pospace Technologies Private Limited's business is conducted.
- 2) All company-related activities performed at any other site away from Pospace

Technologies Private Limited'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.
- 4) All digital workspace which involves interaction between employees & stakeholders of Popspace Technologies Private Limited.

Definition of Sexual Harassment

"Sexual harassment" includes one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:

- 1) Physical contact and advances; or
- 2) A demand or request for sexual favors; or
- 3) Making sexually colored remarks; or
- 4) Showing and sharing pornography; or
- 5) Any other unwelcome physical, verbal, or non-verbal conduct of a sexual nature

Types of Sexual Harassment

Sexual harassment is categorized into two types:

"Quid Pro Quo (this for that) Harassment": Sexual harassment by managers and supervisors generally is considered "quid pro quo" harassment when it involves the solicitation of sexual favors in exchange for some type of employment decision. Quid pro quo harassment arises when an unwelcome request for sexual favors is made by a supervisor and that the subordinate employee's acquiescence or rejection of the request was used as the basis for decisions affecting the compensation, terms, conditions, or other privileges of employment.

Implied or explicit promise of preferential treatment by a supervisor in employment, implied or explicit threat of detrimental treatment in employment or implied and explicit threat about present or future employment status also may constitute quid pro quo harassment.

"Hostile Work Environment Harassment": Harassment by nonsupervisory employees generally falls into the category of "hostile environment" sexual harassment. Typically, there is no direct link between the offensive conduct and a tangible job benefit or detriment in hostile environment

cases. A sexually hostile environment exists when -

- 1) Any employee is subjected to unwelcome conduct that's sexual or based on gender or sex
- 2) The conduct is either severe or frequent
- 3) The conduct changes the employees' working conditions

Any humiliating treatment likely to affect an employee's health or safety may also amount to an act of sexual harassment.

Prevention of Sexual Harassment

- Sexually harassment or offensive conduct in the workplace committed by supervisors, managers, non-supervisory employees, or non-employees, is prohibited
- No employee shall involve in sexual harassment activity whether the harassment occurs in / at the workplace or at any other place where the aggrieved employee is in connection with work
- Popspace Technologies Private Limited subscribes to a Zero Tolerance policy on Sexual Harassment against all employees. Any such proven occurrence will amount to misconduct and is liable to strict disciplinary action in accordance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Policy, 2013 and Popspace Technologies Private Limited Code of Conduct
- Popspace Technologies Private Limited shall take all necessary and reasonable steps to prevent and ensure that no employee is subject to sexual harassment during their course of employment. Where any such sexual harassment occurs, Popspace Technologies Private Limited shall take all necessary steps to assist the aggrieved to redress the act of Sexual harassment.
- No employee shall sexually harass an outsider including clients, suppliers, contract workers and customers, who visit Popspace Technologies Private Limited for any purpose whatsoever.

Employees who believe that a supervisor's, manager's or other employee's actions or words constitute sexual harassment, have a responsibility to report or complain about the situation as soon as possible. The report or complaint should be made to the Internal Committee.

Complaint mechanism

An appropriate complaint mechanism in the form of “Internal Committee” has been created in Popspace Technologies Private Limited for time-bound redressal of the complaint made by the victim in compliance with the Sexual harassment at workplace act.

Internal Committee

Popspace Technologies Private Limited has instituted an Internal Committee for redressal of sexual harassment complaint (made by the victim) and for ensuring time bound treatment of such complaints.

The Internal Committee will be headed by a senior level female employee of the organization and comprise of such number of members as required and provided under the Act, as amended from time to time.

The details of the Internal Committee can be found in Annexure I of this policy.

The Internal Committee is responsible for:

- Investigating every formal written complaint of sexual harassment
- Taking appropriate remedial measures to respond to any substantiated allegations of sexual harassment
- Discouraging and preventing employment-related sexual harassment

Procedure for resolution, settlement, or prosecution of acts of sexual harassment

Popspace Technologies Private Limited is committed to providing a supportive environment to resolve concerns of sexual harassment as under:

When an incident of sexual harassment occurs, the victim of such conduct can communicate their disapproval and objections immediately to the harasser and request the harasser to behave decently.

If the harassment does not stop or if victim is not comfortable with addressing the harasser directly, the victim can bring their concern to the attention of the Internal Committee for redressal of their

grievances by making a formal complaint to any member of the Internal Committee. The victim may make, in writing, a complaint within 90 days from the date of occurrence of the alleged incident or the date of occurrence of the last incident, in case of a series of incidences.

Friends, co-workers, psychologists, and psychiatrists associated with the aggrieved may also file a complaint on their behalf, when the aggrieved is unable to make a complaint on account of physical incapacity, mental incapacity, or death.

The Internal Committee will thereafter make efforts to settle the matter between the parties through conciliation by bringing about an amicable settlement. However, monetary settlement shall not be made a basis of this conciliation. Once the conciliation has been arrived at, the Committee shall record the settlement and thereafter provide copies of the settlement to the complainant and the respondent and subsequently shall not proceed with an inquiry under the Prevention of Sexual Harassment at Workplace policy. In case no settlement is reached, or in case condition of the settlement has not been complied with by the respondent, or in case the complainant is not comfortable with the conciliation process and needs extended support, the Committee shall thereafter provide extended support as requested and undertake prompt investigation to resolve the matter.

The Committee will initiate the investigation and ensure that a copy of the complaint is sent to the respondent within 7 days. Upon receipt of the copy of the complaint, the respondent will be required to respond to the complaint along with supporting documents, names of witness(es) and evidence, as applicable, within 10 working days.

In case the complainant desires any witness(es) to be called or to tender any documents by way of evidence before the Committee, they shall communicate in writing to the Committee the names of witness(es) whom they propose to call and shall supply original copies of documents as required.

Both the complainant and the respondent shall affix his /her signature on their respective documents to certify these to be original copies.

The Committee shall then call upon all witnesses mentioned by both the parties, evaluate the documents and evidence provided and conduct a thorough inquiry into the complaint to

determine its findings and recommendations.

In case the respondent fails to respond to the show cause notice or is not present for the proceedings of the investigation, the Internal Committee will proceed with ex-parte proceeding based on the available information and evidence. However, the deadline for response to the show cause notice may be extended by the Committee in case the respondent provides sufficient reason (including but not limited to serious illness, death of immediate family members or any force majeure incident) with sufficient proof requesting for an extension.

The Internal Committee shall conduct such inquiries in a timely manner, complete the investigation within 90 days from the receipt of the complaint and submit a written report containing the findings and recommendations to the Director/CEO as soon as practically possible and in any case, not later than 10 days from the date of completion of inquiry. The Director/CEO will then ensure corrective action based on the recommendations of the Internal Committee are taken within 60 days of receipt of the Inquiry report and keep the complainant informed of the same.

Corrective action may include any of the following:

1. Formal apology
2. Counselling
3. Written warning to the perpetrator and a copy of it maintained in the employee's file
4. Disciplinary Action: Being made not eligible for promotion process / annual pay increment / not being able to participate in annual variable pay programs, not being nominated for marquee organization events / R&R programs etc. for a specified tenure (generally one / two years) basis severity of offence.
5. Suspension or termination of services of the employee found guilty of the offence

The Internal Committee can also make a recommendation to deduct from the salary/wages of the respondent such sum as may be determined having regard to:

- The mental trauma, pain, suffering, and emotional distress caused to aggrieved,
- The loss in the career opportunity due to the incident,
- Medical expenses incurred by the victim for physical or psychiatric treatment,
- Income and financial status of the respondent.

Where such conduct, on the part of the accused, amounts to a specific offence under the law, Popspace Technologies Private Limited shall initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

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

Confidentiality

Popspace Technologies Private Limited understands that it is difficult for the victim to come forward with a complaint of sexual harassment and recognizes the victim's interest in keeping the matter confidential.

To protect the interests of the victim, the confidentiality of the victim, the accused and others who may report incidents of sexual harassment will be maintained throughout the investigatory process and thereafter to the extent practicable and appropriate under the prevailing circumstances.

Access to reports and documents

All records of complaints, including contents of meetings, results of investigations and other relevant material will be kept confidential by Popspace Technologies Private Limited except where disclosure is required under disciplinary or other remedial processes.

Protection to complainant / victim

Popspace Technologies Private Limited is committed to ensuring that no employee who brings forward a harassment concern is subject to any form of reprisal. Any reprisal will be subject to disciplinary action.

Popspace Technologies Private Limited 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.

Custodian

The Human Resources department is the custodian of this Policy. The Management reserves the right to make any changes to the policy at any time in whole or in part. The employees are required to keep themselves updated with any change in policies.

In the event of an exceptional circumstances, in a business exigency, or when in doubt on the interpretation of the policy, the decision of the Head of the Human Resource and Managing Director would be final and binding.

Non-adherence to this policy will attract disciplinary action in accordance with the Disciplinary Action Policy of the organization.