

## SEXUAL HARASSMENT PREVENTION POLICY (POSH Policy)

### 1. Purpose

TechnoSphere India Private Limited is committed to providing a safe, respectful, and dignified working environment free from sexual harassment for all its employees, contractors, interns, and visitors irrespective of gender. This policy aims to prevent and address incidents of sexual harassment at the workplace in compliance with The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”).

### 2. Scope

This Policy applies to all employees (full-time/part-time/contractual), interns, consultants, vendors, visitors, and any person interacting with TechnoSphere at all its locations including offices, remote work environments, client sites, and work-related social events.

### 3. Definition of Sexual Harassment

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

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

Sexual harassment can be of a physical, verbal, or non-verbal nature, and it includes repeated or single acts.

### 4. Internal Complaints Committee (ICC)

- The Company has constituted an Internal Complaints Committee (ICC) as mandated by the POSH Act.

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- The ICC comprises a Presiding Officer (a woman employed at a senior level), two other members from employees, and one external member from a specialized background.
  - The ICC is responsible for receiving, investigating, and resolving complaints related to sexual harassment.
  - The constitution and member details of the ICC will be displayed prominently at all workplaces and on official communications.
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**5. Complaint Redressal Procedure**

- Any aggrieved employee may submit a written complaint to the ICC within three months of the incident.
  - The complaint can be made in person, via email, or through the designated official.
  - The ICC will review the complaint and initiate a formal enquiry within 10 working days.
  - The enquiry shall be conducted confidentially, interviewing all parties and witnesses.
  - The entire enquiry process is to be completed within 90 days from the date of complaint receipt.
  - Based on findings, the ICC will recommend appropriate action to the Management, which may include warnings, suspension, termination, or legal referral.
  - If the complaint is found to be false or malicious, disciplinary action may be taken against the complainant.
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**6. Support for Victims and Protection**

- Confidentiality of all parties involved will be strictly maintained.
- Protection against retaliation or victimization of complainants and witnesses is assured.
- The Company will extend support such as counseling or medical referral.

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- Interim measures (like change of reporting manager or work location) may be provided as needed during enquiry.
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**7. Awareness and Training**

- The Company will conduct mandatory awareness programs and training on POSH for all employees annually.
  - Specialized training will be provided to ICC members to effectively discharge their duties.
  - Information on POSH rights, complaint mechanism, and this Policy will be communicated regularly and displayed prominently.
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**8. Annual Compliance Report**

- An annual POSH compliance report will be submitted to the Board of Directors and as statutorily required.
  - The report will summarize the number of complaints received, investigations conducted, actions taken, and awareness activities undertaken.
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**9. Disciplinary Action**

Violation of this Policy or any act of sexual harassment will result in strict disciplinary action, which may include warnings, suspension, termination of employment, or filing of criminal complaints in accordance with the POSH Act and relevant laws.

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**10. Confidentiality and Record Keeping**

- All records related to complaints and investigations will be maintained confidentially by the ICC.
  - Documents related to complaints will be kept secure and disclosed only to authorized personnel as per legal requirements.
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**11. Policy Review**

This Policy shall be reviewed annually or as required by changes in the law or Company procedures.

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**Approved by:** Board of Directors**Effective Date:** Jan 2025**Review Date:** Jan 2025