

# **Prevention of Sexual Harassment (POSH) Policy for Longbow Games Private Limited**

## **1. Objective of the POSH Policy**

Our company is committed to providing a safe, respectful, and inclusive workplace free from sexual harassment. This Policy has been developed in compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Rules, 2013.

## **2. SCOPE AND APPLICABILITY**

This Policy applies to:

- All employees, including full-time, part-time, probationers, consultants, trainees, interns, and contractual staff.
- All persons visiting the Company premises, including vendors, clients, service providers and partners.
- All Company workplaces including office premises, remote/virtual work settings, client locations, travel for work, off-sites, and Company-organized events.

## **3. DEFINITION OF SEXUAL HARASSMENT**

Sexual harassment includes one or more of the following unwelcome acts or behaviour:

- (a) Physical contact and advances
- (b) Demand or request for sexual favours
- (c) Making sexually coloured remarks
- (d) Showing pornography or sexual content
- (e) Any other unwelcome physical, verbal or non-verbal conduct of sexual nature

The following circumstances, if related to or connected with any act or behavior of sexual nature, may amount to sexual harassment

- Implied or explicit promise of preferential treatment in employment
- Threat of detrimental treatment in employment
- Threat about present or future employment status
- Interference with work or creating an intimidating, hostile, or offensive environment
- Humiliating treatment likely to affect health or safety

#### **4. INTERNAL COMMITTEE (IC)**

As the Company has more than 10 employees, an Internal Committee (IC) is constituted as mandated by the Act.

##### **4.1 Composition of the IC:**

The following individuals have been identified to constitute the Internal Committee for our organization:

- o Shubha Vijayaraghavan, Director – Presiding Officer
- o Amogh Chakravarthy, CEO and Director – Member
- o Bhavya V, Associate Accountant – Member
- o Samta Ahuja - External Member

##### **4.2 Tenure:**

IC members shall hold office for a period of three years.

##### **4.3 Responsibilities of Internal Committee:**

- Ensure compliance with the relevant aspects of the POSH Act
- Receive and acknowledge complaints
- Conduct fair, neutral, and timely inquiries
- Maintain confidentiality of proceedings
- Submit inquiry report with recommendations

#### **5. COMPLAINT MECHANISM**

##### **5.1 Filing a Complaint**

- A complaint must be submitted in writing within 3 months of the date of the incident or, in the case of a series of incidents, within 3 months from the date of the last incident. The Internal Committee may extend this period by up to 3 additional months only if it is satisfied that the complainant was prevented from filing the complaint within the prescribed time due to sufficient cause, and such reasons shall be recorded in writing.

- If the aggrieved woman is unable to file the complaint, the IC shall assist or allow filing by:
  - A relative/friend
  - Co-worker
  - Any person aware of the incident
  - Legal guardian (in case of minors)

## **5.2 Assistance**

The Company or IC will assist the complainant in drafting the written complaint if requested.

## **6. INQUIRY PROCESS**

- IC shall send a copy of the complaint to the respondent within 7 days.
- Respondent must submit a reply within 10 days.
- IC shall conduct the inquiry in line with principles of natural justice.
- Both parties are required to submit evidence and produce witnesses.
- Inquiry must be completed within 90 days.
- IC shall submit a written report with recommendations to the Employer within 10 days of completion.

## **7. INTERIM RELIEF**

At the request of the complainant, the IC may recommend:

- Transfer of either party
- Granting up to 3 months' paid leave to the complainant. Paid leave is granted only during the pendency of the inquiry, and only if recommended by the IC based on circumstances. If a complaint is later found to be malicious, action may be taken for misuse of provisions.
- Restricting contact between the parties
- Other measures necessary to ensure safety

## **8. CONFIDENTIALITY**

No person shall publish, communicate, or reveal:

- The identity of complainant, respondent, or witnesses
- Details of the inquiry, recommendations, or actions taken

Violation may lead to disciplinary action as well as penalties under the Act.

## **9. PROHIBITION OF RETALIATION**

The Company strictly prohibits retaliation against any individual for filing a complaint, participating in an inquiry, or supporting a complainant. Disciplinary action taken against a respondent after charges are proven, or action taken in cases of malicious or false complaints, shall not be considered retaliation.

## **10. INQUIRY OUTCOME AND PENALTIES**

Based on IC recommendations, the Employer may impose:

- Written apology
- Warning or reprimand
- Withholding promotion or increments
- Suspension
- Termination of employment
- Deduction of compensation payable to the complainant from the salary/wages of the respondent

## **11. FALSE OR MALICIOUS COMPLAINTS**

If the IC concludes that the complaint was malicious or knowingly false, appropriate disciplinary action may be taken.

However, it needs to be noted that inability to prove a complaint does not amount to malice or false complaint.

## **12. RECORD-KEEPING AND REPORTING**

The IC shall maintain records of:

- Complaints received
- Inquiry proceedings
- Findings and actions taken

The Company shall include POSH compliance details in its Annual Report/Annual Return as applicable.

## **13. AWARENESS, COMMUNICATION & TRAINING**

The Company shall:

- Conduct annual POSH awareness programmes for all employees
- Conduct specialized training for IC members
- Display mandatory POSH posters at all offices and on digital channels
- Include POSH orientation during employee onboarding.

## **14. REVIEW & AMENDMENT**

This Policy shall be reviewed periodically on an annual basis or as amended in line with statutory requirements and Company needs whichever is earlier.

## **15. EFFECTIVE DATE**

This Policy is effective from 01<sup>st</sup> of December, 2025.

## **16. Effectiveness of POSH Act and Rules**

Company will ensure compliance to the POSH Act and relevant rules for the provisions/requirements not stated specifically covered in the policy

Policy Prepared by: Samta Ahuja

Policy Reviewed by: Shubha Vijayaraghavan

Policy Approved by: Amogh Chakravarthy

Signature:

(Amogh Chakravarthy)