

Inazuma.co Policy on Prevention of Sexual Harassment (POSH)

Version: 1.0

Reviewed By: HR & Compliance Committee

1. Objective

Inazuma.co is committed to providing a safe, inclusive, and respectful work environment free from all forms of sexual harassment. This Policy on Prevention of Sexual Harassment (POSH) aligns with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and is applicable to all employees, irrespective of gender or role. Our objective is to:

- Foster a workplace that ensures dignity and respect for all individuals.
- Define sexual harassment clearly.
- Lay down procedures for reporting and redressal.
- Establish preventive and educational measures.
- Foster a culture of zero tolerance towards harassment of any kind.
- Encourage prompt reporting and robust resolution mechanisms.

2. Scope

This policy applies to:

- All full-time, part-time, contractual, and temporary employees.
- Interns, consultants, and third-party vendors.
- All locations where Inazuma.co employees operate, including remote work settings, co-working spaces, client offices, and during any company-sponsored events.

Sexual harassment is unacceptable both within and outside the physical office premises, including virtual meetings, off-site events, social gatherings, or any setting connected to the work environment or during travel for business purposes.

3. Definition of Sexual Harassment

Sexual harassment includes, but is not limited to, any one or more of the following unwelcome acts or behavior:

**Cate
gory**

Examples

Verbal	Sexual comments, innuendos, jokes, repeated flirtations, degrading language
Non-verbal	Staring, gestures, lewd expressions, display of offensive visuals or media
Physical	Unwanted touching, patting, brushing, blocking movement, hugging
Written/Digital	Offensive texts, emails, memes, posts, online stalking, sexually explicit content
Quid Pro Quo	Implied or direct promises of reward in exchange for sexual favors

The policy covers all forms of harassment regardless of gender, orientation, or identity of the individuals involved.

- Right to confidentiality during investigations.

4.2 Responsibilities of Employees

- Abide by the POSH policy.
- Maintain professional behavior in all interactions.
- Report observed incidents of harassment.
- Cooperate in investigation and training initiatives.
- Avoid misuse of the policy.

4. Rights and Responsibilities

4.1 Rights of Employees

- Right to work in a harassment-free environment.
- Right to access a fair and unbiased redressal process.
- Right to be protected from retaliation.

5. Internal Complaints Committee (ICC)

An Internal Complaints Committee is established as per the POSH Act. The committee functions independently and maintains utmost confidentiality throughout proceedings.

5.1 Composition of ICC

Role	Requirement
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Presiding Officer	A senior female employee
External Member	A person familiar with social work or POSH law
Member 1	Employee aware of gender issues
Member 2	Employee with strong ethical standing

if credible.

5.2 Committee Tenure and Meetings

- ICC term: 3 years.
- Quarterly internal reviews.
- Minimum two-thirds of ICC must be women.

6.2 Complaint Format Template

Field	Details Required
Complainant's Name	Full name, designation, and department
Respondent's Name	Person against whom complaint is made
Incident Description	Date, time, location, nature of incident
Witnesses	Names and contact details, if any
Evidence (if any)	Emails, chat logs, images, voice notes, etc.

Complaints may be addressed to ICC or via email to: posh@inazuma.co.

6. Complaint Mechanism

6.1 Filing a Complaint

- Submit in writing within 3 months from the incident.
- Delayed submissions (up to 6 months) may be considered with justification.
- Anonymous complaints are not encouraged but may be investigated

7. Redressal Process

7.1 Preliminary Review

- The ICC assesses whether the complaint falls within the policy's scope.
- Respondent is notified with a copy of the complaint.

- Interim relief (e.g., transfer or leave) may be recommended.

7.2 Full Investigation

Phase	Activity
Inquiry Meetings	ICC conducts interviews with complainant, respondent, and witnesses
Evidence Collection	Gathering documents, recordings, communications
Findings Report	ICC prepares a comprehensive report with recommendations
Closure	Both parties are informed of the decision and resolution

7.3 Timeline

Step	Maximum Time Allowed
Complaint Submission	Within 3 months of incident
Investigation Completion	90 days
Submission of Recommendations	Within 10 days of closure
Employer's Action Implementation	Within 60 days

8. Disciplinary Actions

ICC may recommend one or more of the following based on severity:

Severity Level	Examples	Consequences
Low	Inappropriate joke or comment	Apology, verbal warning
Medium	Repeated remarks, touching, indirect threats	Suspension, written warning, training
High	Explicit request for favors, physical abuse	Termination, legal action, police report

Corrective actions will be recorded in the employee's official HR file.

9. False Complaints and Misuse

Any complaint found to be deliberately false or malicious will be penalized. This does not include unproven allegations made in good faith.

Consequences for False Complaints:

- Written warning
 - Disciplinary probation
 - Up to termination based on severity
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10. Confidentiality and Non-Retaliation

10.1 Confidentiality

- All parties involved are expected to maintain discretion.
- ICC proceedings and documents are classified and restricted.

10.2 Protection from Retaliation

- Retaliation in any form (e.g., demotion, exclusion, gossip) is strictly prohibited.
 - Retaliatory actions will be addressed with equal seriousness as the original complaint.
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11. Training, Awareness, and Communication

11.1 Training Modules

- Mandatory onboarding POSH training
- Annual e-learning and refresher programs
- Special workshops for ICC members and leadership

11.2 Communication Strategy

- POSH posters in prominent office locations
- Dedicated intranet POSH resource section
- Monthly newsletter snippets and updates

Sample POSH Training Calendar

Quarter	Training Type	Target Group	Mode
Q1	POSH Fundamentals	All new employees	Online

Q2	Managerial Response Training	Team Leads & Managers	Class room
Q3	Legal Deep Dive	ICC & HR Professionals	Work shop
Q4	Culture and Empathy Building	Entire Organization	Online/Hybrid

- Post any significant legal updates
- Upon ICC recommendation based on case analysis

All updates will be approved by the leadership and communicated company-wide.

12. Policy Enforcement and Monitoring

- The HR department shall ensure timely execution of ICC's recommendations.
- Annual POSH audit by third-party experts.
- Confidential employee surveys to identify gaps.

13. Policy Review and Amendment

This policy shall be reviewed:

- Annually by the HR and Compliance Team

14. Contact and Reporting

Internal Complaints Committee (ICC)

Email: posh@inazuma.co

Helpline (Confidential): +91-XXXXXXXXXX

Office Room: 4th Floor, Compliance Wing, Corporate HQ

15. Acknowledgment and Compliance

Every employee is required to acknowledge this policy annually.

POSH Policy Acknowledgment Form

I hereby confirm that I have read, understood, and agree to abide by Inazuma.co's POSH Policy. I will uphold the values of respect, dignity, and workplace safety.

*Together, we uphold dignity,
foster safety, and ensure
equality at Inazuma.co.*



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