

## POSH POLICY

### 1. Objective

In accordance with the POSH Act, 2013, Infoservices Digitech India Private Limited is committed to maintaining a safe and healthy work environment — free from discrimination, bias, and sexual harassment. The policy aims to prevent, prohibit, and redress incidents of harassment, ensuring every employee can work with dignity and confidence.

### 2. Scope

This policy applies to all individuals at Infoservices Digitech India Private Limited, including:

- Full-Time Employees
- Consultants, Interns, Project Trainees
- Housekeeping & Support Staff

It covers all work-related settings—office premises, client sites, work-related travel, official events, and transportation, as outlined in the POSH Act.

### 3. Sexual Harassment

Infoservices Digitech India Private Limited strictly prohibits any form of harassment in the workplace, including sexual harassment. Sexual harassment does not refer to occasional compliments or comments that are socially acceptable. The term “sexual harassment” would include but not limited to the following:

- Unwelcome sexual advances or humiliation.
- Requests for sexual favours, when submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or employment opportunity. When submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting the individual or when such conduct has the purpose or effect of substantially interfering with an individual’s work performance or creating an intimidating, hostile or offensive working environment. Sexual harassment may include a wide variety of behaviours and occurs at various levels, including but not limited to the following:
  - a) Unwelcome physical contact of a sexual nature such as patting, pinching and unnecessary touching.
  - b) Overt or implied threats against an individual to induce him or her to perform sexual favours or to engage in an unwelcome sexual relationship.
  - c) Verbal harassment or abuse of a sexual nature including hints of a desire for sexual relations or making jokes or remarks of a sexual nature to or in front of a person who finds them offensive.
  - d) Use of sexually suggestive terms or gestures to describe an individual’s body, clothing or sexual activity.

- e) Displaying, forwarding or posting offensive, sexually suggestive pictures, jokes or materials (including emails) in the workplace.
- f) Showing pornography or making sexually coloured remarks. If any employee believes that he/she has been harassed through any of the types as mentioned above they should approach the "Internal Complaints Committee (ICC)". All such claims / complaints would be investigated and treated confidentially to the extent that confidentiality is consistent with a thorough investigation of the reported incident.

#### **4. Procedure**

- Any employee who feels that he/she (Complainant) was harassed or is being harassed directly or indirectly may approach the Internal Complaints Committee (ICC) or any member of the ICC with a complaint on the alleged incident through an email; not later than 3 months from the day of the incident.
- The ICC comprises of 5 members which includes a women representative from an NGO and is headed by a women Presiding Officer (PO). Together the ICC would investigate the complaint under total confidentiality.
- The complainant should ensure that he/she informs at least one member of the ICC who is an employee before he/she makes a complaint to the ICC representative from the NGO.
- The ICC would hold a meeting with the complainant within three days of the receipt of the complaint, but no later than a week in any case.
- The Presiding Officer would be sending an email communication to the HR-Head documenting the facts within 3 days of holding every meeting.
- The Presiding Officer would document the complete details of the complaint, the proceedings, arguments, decision etc.
- The ICC is empowered to investigate the matter in detail and for this purpose it can summon both the parties for a discussion together or separately, multiple times.
- If the ICC believes that the charges levied by the complainant are correct, then an appropriate action would be initiated with the approval of the GDC- Head; that could include immediate termination from employment also.
- The decision / action initiated by the ICC would be final and binding on both the parties.

## 5. General Guidelines:

- Once an employee makes a complaint, it will be investigated.
- The complaint is accepted only when it is sent in a written format (email / handwritten).
- The information regarding the complaint and investigation should be kept confidential by all the parties including the members of ICC and it should not be the subject of discussion with other colleagues or any individual or forum outside the organization' After a thorough investigation by the ICC, if an employee is found to be guilty of the charges, then it may lead to his immediate termination from employment.
- The relieving letter of an employee who is terminated from service on the basis of a sexual harassment case will document the same reason for termination.
- In case the charges levied by the complainant are found to be false then an appropriate action against the complainant would be initiated.
- Both the parties are not allowed to be represented by a legal practitioner or any other individual.

## 6. Committee Members:

- Ramya Kuradi – Presiding Officer (Designation: Director)  
Email: [ramya.kuradi@infoservices.com](mailto:ramya.kuradi@infoservices.com), Phone: 9492718199
- Mohan Kuradi – Member (Designation: Vice President)  
Email: [mohank@infoservices.com](mailto:mohank@infoservices.com), Phone: 9492718188
- Srinivas Konduru – Member (Designation: Vice President)  
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- Neha Zaveri – Member (Designation: Engineering Manager)  
Email: [nehazaveri@infoservices.com](mailto:nehazaveri@infoservices.com)
- Shanthala Baleger – Member (Designation: Director)  
Email: [SBaleger@infoservices.com](mailto:SBaleger@infoservices.com)
- KVR Chowdhary – External Member (Advocate)

**Mail the Committee at: [poshcommittee@infoservices.com](mailto:poshcommittee@infoservices.com)**